

FINAL ENVIRONMENTAL IMPACT REPORT'

for the

**Proposed San Diego Downtown
Community Plan, Centre City Planned District Ordinance,
and 10th Amendment to the Redevelopment Plan
for the
Centre City Redevelopment Project**

SCH No. 2003041001

Prepared by:

**Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101
619.235.2200**

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Traffic Model Output
(Existing and No Project Conditions)

VOLUME 3B

Traffic Model Output
(Proposed Plan – Unmitigated)

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LIST OF ACRONYMS

A

ACMs	Asbestos Containing Materials
ADT	Average Daily Trips
AF	Acre-Feet
AIA	Airport Influence Area
APCD	Air Pollution Control District

B

BMPs	Best Management Practices
BRT	Bus Rapid Transit

C

CAAQS	California Ambient Air Quality Standards
CAC	County Administration Center
Cal-EPA	California Environmental Protection Agency
Cal-OSHA	California Division of Occupational Safety and Health Administration
CARB	California Air Resources Board
CCC	California Coastal Commission
CCDC	Centre City Development Corporation
CD	Compact disks
CEQA	California Environmental Quality Act
CFR	Code of Regulations
CIP	Capital Improvement Projects
CLUP	Comprehensive Land Use Plan
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CWA	Clean Water Act

D

dB	Decibel
dBA	A-weighted decibel
DEH	Department of Environmental Health
DIF	Development Impact Fees
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control

E

EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESD	Environmental Services Department

F

FAR	Floor Area Ratio
-----	------------------

H

HABS	Historic American Building Survey
HOV	High Occupancy Vehicle
HPLV	High Volume-Low Pressure
HRB	Historical Resources Board

I

I-5	Interstate 5
ITE	Institute of Traffic Engineers

J

JPA	Joint Powers Authority
JURMP	Jurisdiction Urban Runoff Management Plan

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L

LCP	Local Coastal Program
LCP	Local Coastal Program
Leq	Equivalent Sound Level
LNAPLs	Light Non-Aqueous Phase Liquids
LOS	Level of Service

M

MAF	Million Acre Feet
MER	Mass Emission Rate
mgd	Million Gallons Per Day
MMRP	Mitigation Monitoring and Reporting Plan
MSCP	Multiple Species Conservation Program
MSL	Mean Sea Level
MWD	Metropolitan Water District
MWWD	Metropolitan Wastewater Department

N

NAAQS	National Ambient Air Quality Standards
NB	Northbound
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NTHP	National Trust for Historic Preservation

O

O ₃	Ozone
OSHA	Occupational Safety and Health Administration

P

PDO	Planned District Ordinance
PLWTP	Point Loma Wastewater Treatment Plant
PM ₁₀	particulate matter smaller than 10 microns in diameter
PM _{2.5}	particulate matter with diameters of 2.5 microns or less

R

RAQS	Regional Air Quality Strategy
RCBs	reinforced concrete boxes
RCFZ	Rose Canyon fault zone
RCP	Regional Comprehensive Plan
RCPs	reinforced concrete pipes
RCRA	Resources Conservation and Recovery Act
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RTV	Regional Transit Vision
RWQCB	Regional Water Quality Control Board

S

SAM	Site Assessment Mitigation
SANDAG	San Diego Association of Governments
SAM	Site Assessment Mitigation
SANDAG	San Diego Association of Governments
SB	Southbound
SBWTP	South Bay Wastewater Treatment Plant
SDAB	San Diego Air Basin
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	City of San Diego Fire Department
SDG&E	San Diego Gas and Electric
SDIA	San Diego International Airport
SDPD	San Diego Police Department
SDUPD	San Diego Unified Port District

SGOA Smart Growth Opportunity Areas
SIP State Implementation Plan
SO₂ sulfur dioxide
SOHO Save Our Heritage Organization
SR-163 State Route 163
SR-94 State Route 94
SUSMP Standard Urban Storm Water
Mitigation Plan
SWPPP Storm Water Pollution Prevention
Plan

T

TACs toxic air contaminants
TDM Transportation Demand
Management
TDR Transfer of Development Rights

U

ULI Urban Land Institute
URM Un-reinforced Masonry
VMT Vehicle Miles Traveled

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EXECUTIVE SUMMARY

1.1 INTRODUCTION

This summary provides a brief synopsis of: (1) the proposed Plans and Ordinance, (2) the results of the environmental analysis contained within the Environmental Impact Report (EIR), (3) the alternatives to the proposed Plans and Ordinance that were considered, and (4) the major areas of controversy and issues to be resolved by decision-makers. By necessity, this summary does not contain the extensive background and analysis found in the document. Therefore, the reader should review the entire document to fully understand the project and its environmental consequences.

1.2 DESCRIPTION AND LOCATION

The subject of this Environmental Impact Report (EIR) is a proposal to modify the Redevelopment Plan, Community Plan and Planned District Ordinance which govern development of downtown San Diego. The downtown area covers approximately 1,455 acres. The area is generally bounded by Laurel Street and Interstate (I-) 5 on the north; I-5, Commercial Street, 16th Street, Sigsbee Street, Newton Avenue, Harbor Drive, and the extension of Beardsley Street on the east; and San Diego Bay on the south and west.

The proposed Downtown Community Plan would establish the overall vision for downtown and outline policies to attain this vision. The Downtown Community Plan would also serve as the basis for detailed zoning and development standards as well as a variety of other actions, such as open space acquisitions and transportation improvements.

Under the proposed Downtown Community Plan, downtown, at buildout, would consist of an integrated and connected network of distinct neighborhoods and districts. These include Civic/Core, Columbia, Convention Center, Cortez, East Village, Gaslamp Quarter/Horton Plaza, Little Italy, and Marina. Each would contain a mixed-use center and a park. Several of downtown's neighborhoods, including Little Italy, Marina, and the Core, are established and not expected to change significantly as a result of the proposed Downtown Community Plan. Other areas, particularly East Village, would undergo major transformations to accommodate increasing residential and commercial activity.

The proposed Downtown Community Plan would depart from the existing 1992 Centre City Community Plan by further increasing intensity and density of land uses and increasing resident and employment populations. In addition, the proposed Plan would provide more park space, orient downtown's neighborhoods around mixed-use centers, and connect neighborhoods through Boulevards, Green Streets, and freeway lids.

The Centre City Redevelopment Plan would be amended for consistency with the Downtown Community Plan.

The Centre City Planned District Ordinance would be amended to implement the proposed Community Plan.

1.3 ENVIRONMENTAL EFFECTS

The EIR contains an environmental analysis of the potential impacts associated with implementing the proposed Plans and Ordinance. The major issues that are addressed in this EIR were determined to be potentially significant based on review by the Centre City Development Corporation (CCDC) and comment received on the Notice of Preparation. The issues include land use and planning, transportation/access/parking, cultural resources, public services and facilities, geology and seismicity, aesthetics/visual quality, noise, air quality, hydrology/water quality, hazardous materials, population/housing, paleontological resources and energy.

Tables 1.3-1 summarize the potentially significant environmental impacts and proposed mitigation measures by major issue, as analyzed in Chapters 5.0 and 6.0 of this EIR. The last column of this table indicates whether the impact would be reduced to below a level of significance after implementation of proposed mitigation measures. In some cases, it is concluded that the impact would remain significant despite the existence of mitigation measures. This conclusion is frequently made because of the programmatic nature of the mitigation and/or uncertainty over whether the mitigation measure would actually be carried out to the fullest extent possible. This is particularly true for roadway improvements because of funding questions and potential incompatibility with pedestrian access.

Table 1.3-2 summarizes the key goals and policies from the proposed Community Plan which are identified in Chapters 5.0 and 6.0 as reducing the potential impacts associated with various major issues. These goals and policies will be considered during the Secondary Study prepared for subsequent development.

Table 1.3-3 summarizes the potential environmental impacts that are not considered significant, which consist of biological, mineral, and agricultural resources as analyzed in Chapter 8.0 (Effects Found not to be Significant) of this EIR.

1.4 ALTERNATIVES

The focus of the alternatives analysis is on the No Project Alternative, which would involve implementation of the existing Community Plan. Based on the nature of the impacts identified in Chapters 5.0 and 6.0 of this EIR, no modifications to the proposed plans and policies were identified that would substantially lessen the environmental impacts. ~~The Alternatives Considered But Rejected discussion in Section 10.2, discusses three interim concepts for the Community Plan which were developed prior to selection of the proposed Community Plan. As discussed in this section, none of these initial scenarios were considered superior to the proposed Community Plan and none would have substantially reduced environmental impacts. Three preliminary concepts for downtown development~~

were evaluated before selecting the proposed plan. However, these concepts would not substantially reduce environmental impacts and, thus, are not considered as CEQA alternatives.

Under the No Project Alternative, development within downtown would occur pursuant to the Centre City Community Plan that was originally adopted in 1992 including related Planned District Ordinances. While implementation of the 1992 Plan would achieve the same general objectives as the proposed Community Plan, the 1992 Plan would have several notable differences. First, it would result in an overall reduced intensity of development. The 1992 Plan would result in up to 30,700 residential units with a population of 48,000 people in comparison with the 53,100 residential units and population of 89,100 under the proposed plan. The office development would be 20,700,000 square feet in comparison with 29,821,000 with the proposed plan. The retail intensity would be 4,300,000 rather than 6,070,000 square feet. Employment under the 1992 Plan would be 117,000 as opposed to 167,700 jobs.

As illustrated in Table 1.4-1, development under the No Project Alternative would have very similar impacts as development under the proposed Plans and Ordinance. In four areas (air quality, noise, traffic and visual quality), the impact of the 1992 Plan was determined to have potentially less impact on the environment due largely to a reduced number of automobile trips.

1.5 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

In accordance with the requirements of Section 15123 (b) (2 and 3) of the California Environmental Quality Act (CEQA) Guidelines, this section identifies the potential areas of controversy as well any issues which will likely need to be resolved by decision-makers in relationship to the environmental effects of the proposed Plans and Ordinance.

In the course of public meetings concerning the proposed Plans and Ordinance, local citizens and organizations have expressed concern regarding the following major environmental issues.

1.5.1 LAND USE

Concern has been expressed by surrounding neighborhoods (Barrio Logan, in particular) regarding potential land use compatibility issues related to air quality, noise, and community character. As discussed in Chapters 5.1, 5.6 and 5.7 of the EIR, no significant impacts on surrounding neighborhoods are anticipated with respect to air, noise or community character. Although surrounding neighborhoods may be affected by existing operations such as the Tenth Avenue Marine Terminal, the proposed Community Plan would not encourage new uses which may create substantial compatibility issues, and would not directly change any of the existing activities of concern.

1.5.2 TRAFFIC AND PARKING

Surrounding neighborhoods have expressed a concern that traffic and parking may increase in their neighborhoods due to the increased development potential under the proposed Community Plan. As

discussed in Chapter 5.2, traffic volumes on surrounding areas are anticipated to increase but only in one case would the increase be significant. Forecasting potential effects on neighborhood parking is more difficult due to the uncertainty related to the amount of the demand unmet by parking requirements that would be met by private and public parking facilities. In response to this, periodic reviews of parking conditions in surrounding neighborhoods are proposed to allow proactive response to any problems which may develop.

1.5.3 PUBLIC SERVICES

The ability of downtown police and fire facilities to meet the anticipated demand of development under the proposed Community Plan has been raised. However, as discussed in Chapter 5.4, this issue is considered outside the scope of CEQA. In accordance with Sections 15126.2(a) and 15382 of the CEQA Guidelines, impacts related to public services are evaluated in light of whether the impact would result in a physical change in the environment. For instance, the need to add staff or equipment to meet a future need would only be considered a significant environmental impact if it would precipitate the need to construct a new facility which could result in a physical change in the environment. If the additional staff and equipment can be housed within existing buildings, no physical change would result and no environmental impact would occur. Where additional facilities may be required but the location or extent of such a facility is unknown, Section 15145 of the CEQA Guidelines states that potential impacts need not be specifically addressed in an EIR if the assumptions needed to analyze potential effects are considered too speculative.

1.5.4 HOUSING

The issue of the effect of the proposed Plans and Ordinance on housing has been raised with respect to the effect of development upon the existing affordable housing stock downtown and the potential for new affordable housing. In a related issue, concern has been expressed over the effect of downtown development on existing affordable housing in surrounding neighborhoods if downtown development increases the property values in surrounding; thereby increasing the cost of housing and rent. These concerns fall into the general category of socio-economic considerations and are not required to be addressed in an EIR. Section 15131(a) of the CEQA Guidelines indicates that “economic or social effects of a project shall not be treated as significant effects on the environment.” As with public services, affordable housing issues would only be addressed if they result in a physical change in the environment. The physical effects of construction of new housing is considered in the EIR. There are no issues related to affordability that would translate into unique physical changes in the environment.

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
AIR QUALITY (AQ)		
<p>Impact AQ-B.1: Dust and construction equipment engine emissions generated during grading and demolition would impact local and regional air quality. (Direct and Cumulative)</p>	<p><i>Mitigation Measure AQ-B.1-1:</i> Prior to approval of a Grading or Demolition Permit, the City shall confirm that the following conditions have been applied, as appropriate:</p> <ol style="list-style-type: none"> 1. Exposed soil areas shall be watered twice per day. On windy days or when fugitive dust can be observed leaving the development site, additional applications of water shall be applied as necessary to prevent visible dust plumes from leaving the development site. When wind velocities are forecast to exceed 25 miles per hour, all ground disturbing activities shall be halted until winds that are forecast to abate below this threshold. 2. Dust suppression techniques shall be implemented including, but not limited to, the following: <ol style="list-style-type: none"> a. Portions of the construction site to remain inactive longer than a period of three months shall be seeded and watered until grass cover is grown or otherwise stabilized in a manner acceptable to the CCDC. b. On-site access points shall be paved as soon as feasible or watered periodically or otherwise stabilized. c. Material transported offsite shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. d. The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times. 3. Vehicles on the construction site shall travel at speeds less than 15 miles per hour. 4. Material stockpiles subject to wind erosion during construction activities, which will not be utilized within three days, shall be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer. 5. Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily or washed down at the end of the work day to remove soil tracked onto the paved 	<p>Not Significant (Direct) Significant (Cumulative)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p>surface. Any visible track-out extending for more than fifty (50) feet from the access point shall be swept or washed within thirty (30) minutes of deposition.</p> <ol style="list-style-type: none"> 6. All diesel-powered vehicles and equipment shall be properly operated and maintained. 7. All diesel-powered vehicles and gasoline-powered equipment shall be turned off when not in use for more than five minutes, as required by state law. 8. The construction contractor shall utilize electric or natural gas-powered equipment in lieu of gasoline or diesel-powered engines, where feasible. 9. As much as possible, the construction contractor shall time the construction activities so as not to interfere with peak hour traffic. In order to minimize obstruction of through traffic lanes adjacent to the site, a flag-person shall be retained to maintain safety adjacent to existing roadways, if necessary. 10. The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew. 11. Low VOC coatings shall be used as required by SDAPCD Rule 67. Spray equipment with high transfer efficiency, such as the high volume-low pressure (HPLV) spray method, or manual coatings application such as paint brush hand roller, trowel, spatula, dauber, rag, or sponge, shall be used to reduce VOC emissions, where feasible. 12. If construction equipment powered by alternative fuel sources (LPG/CNG) is available at comparable cost, the developer shall specify that such equipment be used during all construction activities on the development site. 13. The developer shall require the use of particulate filters on diesel construction equipment if use of such filters is demonstrated to be cost-competitive for use on this development. 14. During demolition activities, safety measures as required by City/County/State for removal of toxic or hazardous materials shall be utilized. 	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p>15. Rubble piles shall be maintained in a damp state to minimize dust generation.</p> <p>16. During finish work, low-VOC paints and efficient transfer systems shall be utilized, to the extent feasible.</p> <p>17. If alternative-fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible.</p>	
<p>Impact AQ-C.1: Emissions from automobile and truck trips generated by future development of downtown would impact regional air quality. (Cumulative)</p>	<p>Federal, state and local regulations as well as implementation of goals and policies of the proposed Plans and Ordinances would reduce mobile source emissions but not below a level of significance.</p>	<p>Significant (Cumulative)</p>
HISTORICAL RESOURCES (HIST)		
<p>Impact HIST-A.1: Future development in downtown could impact significant historic structures. (Direct and Cumulative)</p>	<p><u><i>Mitigation Measure HIST-A.1-1: For historic resources which are 45 years of age or older and which have not been evaluated for local, state and federal historic significance, CCDC shall consult with HRB to determine whether the resources is significant pursuant to CEQA.</i></u></p> <p><u>For resources that have been formally determined to be significant under federal, state or local criteria, the following actions shall be carried out under direction of CCDC in consultation with HRB, as appropriate.</u></p> <ul style="list-style-type: none"> • <u>National Register-Listed/Eligible, California Register-Listed/Eligible Resources: Resources listed on or formally determined eligible for the National Register or California Register and structures identified as contributing structures within a National or California Register District, shall be retained onsite and any improvements, renovation, rehabilitation and/or adaptive reuse of the property shall ensure its preservation according to the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings and Guidelines for Rehabilitation of Historic Buildings.</u> • <u>San Diego Register-Listed Resources: Any development that proposes to remove or significantly alter one of these historical resources shall comply with Chapter 14, Article 3, Division 2 of the San Diego Municipal Code which regulates Historical Resources.</u> 	<p>Significant (Direct and Cumulative)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
<p>Note: The original text for Mitigation Measure HIST-A.1-1 that was included in the DEIR has been replaced by the above text. The original deleted language appears in Section 5.3.4 of this FEIR.</p>		
<p><u><i>Mitigation Measure HIST-A.1-2: If the potential exists for direct and/or indirect impacts to retained or relocated designated historical resources, the following measures shall be implemented.</i></u></p> <p><u>I. Prior to Permit Issuance</u></p> <p><u>A. Construction Plan Check</u></p> <p>1. <u>Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for historical monitoring during demolition and/or stabilization have been noted on the appropriate construction documents.</u></p> <p>(a) <u>Stabilization work can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits.</u></p> <p>(b) <u>Physical description, including the year and type of structure, and extent of stabilization shall be noted on the plans.</u></p> <p><u>B. Submittal of Treatment Plan for Retained Historic Resources</u></p> <p>1. <u>Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Applicant shall submit a Treatment Plan to CCDC for review and approval that includes measures for protecting any historic buildings and/or building components during construction related activities (e.g. removal of non-historic features, demolition of adjacent structures, subsurface structural support, etc.). The Treatment Plan shall be shown as notes on all construction documents (i.e. Grading and/or Building Plans).</u></p> <p><u>C. Letters of Qualification have been submitted to CCDC</u></p> <p>1. <u>The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the historical monitoring program (i.e., Architectural Historian, Historic Architect and/or Historian), as</u></p>		

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>defined in the City of San Diego Historical Resources Guidelines (HRG).</u></p> <ol style="list-style-type: none"> 2. <u>CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the historical monitoring of the project.</u> 3. <u>Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program.</u> <p><u>II. Prior to Start of Construction</u></p> <p><u>A. Documentation Program (DP)</u></p> <ol style="list-style-type: none"> 1. <u>Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to CCDC for review and approval and shall include the following:</u> <ol style="list-style-type: none"> (a) <u>Photo Documentation</u> <ol style="list-style-type: none"> (1) <u>Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.</u> (2) <u>Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).</u> (b) <u>Required drawings</u> <ol style="list-style-type: none"> (1) <u>Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable).</u> 	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.</u></p> <p><u>(2) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).</u></p> <p><u>2. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.</u></p> <p><u>B. PI Shall Attend Precon Meetings</u></p> <p><u>1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical Monitoring program with the Construction Manager and/or Grading Contractor.</u></p> <p><u>(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</u></p> <p><u>2. Historical Monitoring Plan (HMP)</u></p> <p><u>(a) Prior to the start of any work that requires monitoring, the PI shall submit a Historical Monitoring Plan which describes how the monitoring would be accomplished for approval by CCDC. The HMP shall include an Historical Monitoring Exhibit (HME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.</u></p> <p><u>(b) Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.</u></p> <p><u>(c) The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request</u></p>	

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Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>shall be based on relevant information such as review of final construction documents which indicate site conditions such as underpinning, shoring and/or extensive excavation which could result in impacts to, and/or reduce impacts to the on-site or adjacent historic resource.</u></p> <p><u>C. Implementation of Approved Treatment Plan for Historic Resources</u></p> <ol style="list-style-type: none"> <u>1. Implementation of the approved Treatment Plan for the protection of Historic Resources within the project site may not begin prior to the completion of the Documentation Program as defined above.</u> <u>2. The Historian and/or Architectural Historian shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historic resource to photo document the Treatment Plan process.</u> <u>3. The Historian and/or Architectural Historian shall document activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to CCDC.</u> <u>4. Prior to the start of any construction related activities, the applicant shall provide verification to CCDC that all historic resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report.</u> <u>5. CCDC will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed.</u> <p><u>D. Verification of approval of a Historical Commemorative Program (HCP), if applicable</u></p> <ol style="list-style-type: none"> <u>1. The applicant shall submit documentation to CCDC for concurrent review and approval by HRB for a site-specific HCP, if mitigation for impacts to a designated resource is based on association with an important person, event or community history and the building would not be retained on-site.</u> <u>2. CCDC shall provide a letter to the applicant approving or denying the proposal prior to the first preconstruction meeting and/or issuance of any construction permit. However,</u> 	

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Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>should CCDC grant conditional approval of the proposal, construction may be allowed to proceed, but the Certificate of Occupancy may not be issued until the historical commemorative program is approved.</u></p> <p>3. <u>Prior to the issuance of any Certificate of Occupancy, the applicant shall provide verification to CCDC that the HCP has been implemented in accordance with the approved program. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of photo documentation or appropriate reporting program.</u></p> <p>4. <u>CCDC will provide written verification to the RE or BI after the site visit indicating that the Certificate of Occupancy can issued.</u></p> <p><u>III. During Construction</u></p> <p><u>A. Monitor Shall be Present During Grading/Excavation/Trenching</u></p> <p>1. <u>The monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to historical resources as identified on the HME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.</u></p> <p>2. <u>The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY incidents involving the historical resource. The RE shall forward copies to CCDC.</u></p> <p>3. <u>The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition arises which could effect the historical resource being retained on-site or adjacent to the construction site.</u></p> <p><u>B. Notification Process</u></p> <p>1. <u>In the event of damage to a historical resource retained on-site or adjacent to the project site, the Historical Monitor shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI).</u></p> <p>2. <u>The PI shall immediately notify CCDC by phone of the incident, and shall also submit</u></p>	

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Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.</u></p> <p><u>C. Determination/Evaluation of Impacts to a Historical Resource</u></p> <p><u>1. The PI shall evaluate the incident relative to the historical resource.</u></p> <p><u>(a) The PI shall immediately notify CCDC by phone to discuss the incident and shall also submit a letter to CCDC indicating whether additional mitigation is required.</u></p> <p><u>(b) If impacts to the historical resource are significant, the PI shall submit a proposal for mitigation and obtain written approval from CCDC. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.</u></p> <p><u>(c) If impacts to the historical resource are not considered significant, the PI shall submit a letter to CCDC indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</u></p> <p><u>IV. Night Work</u></p> <p><u>A. If night work is included in the contract</u></p> <p><u>1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.</u></p> <p><u>2. The following procedures shall be followed.</u></p> <p><u>(a) No Impacts/Incidents</u></p> <p><u>In the event that no historical resources were impacted during night work, the PI shall record the information on the CSV and submit to CCDC via fax by 9 am the following morning, if possible.</u></p> <p><u>(b) Potentially Significant Impacts</u></p> <p><u>If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed.</u></p> <p><u>(c) The PI shall immediately contact CCDC, or by 8 am the following morning to report and discuss the findings as indicated in Section III-B, unless other specific</u></p>	

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Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>arrangements have been made.</u></p> <p><u>B. If night work becomes necessary during the course of construction</u></p> <ol style="list-style-type: none"> <u>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</u> <u>2. The RE, or BI, as appropriate, shall notify CCDC immediately.</u> <p><u>C. All other procedures described above shall apply, as appropriate.</u></p> <p><u>V. Post Construction</u></p> <p><u>A. Submittal of Draft Monitoring Report</u></p> <ol style="list-style-type: none"> <u>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring.</u> <ol style="list-style-type: none"> <u>(a) The preconstruction Treatment Plan and Documentation Plan (photos and measured drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report.</u> <u>(b) The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the resource. Updated forms shall be submitted to the South Coastal Information Center with the Final Monitoring Report.</u> <u>2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</u> <u>3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.</u> <u>4. CCDC shall provide written verification to the PI of the approved report.</u> <u>5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</u> <p><u>B. Final Monitoring Report(s)</u></p> <ol style="list-style-type: none"> <u>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification</u> 	

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	<p style="text-align: center;"><u>from CCDC that the draft report has been approved.</u></p> <p style="text-align: center;"><u>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC.</u></p> <p>Note: The original text for Mitigation Measure HIST-A.1-2 that was included in the DEIR has been replaced by the above text. The original deleted language appears in Section 5.3.4 of this FEIR.</p>	
	<p><i>Mitigation Measure HIST-A.1-3:</i> If a Designated Local Register historical resource would be demolished, the following measure shall be implemented.</p> <p><u>I. Prior to Issuance of a Demolition Permit</u></p> <p style="padding-left: 20px;"><u>A. A Documentation Program (DP) shall be submitted to CCDC for review and approval and shall include the following:</u></p> <p style="padding-left: 40px;"><u>1. Photo Documentation</u></p> <p style="padding-left: 60px;"><u>(a) Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.</u></p> <p style="padding-left: 60px;"><u>(b) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).</u></p> <p style="padding-left: 40px;"><u>2. Required drawings</u></p> <p style="padding-left: 60px;"><u>(a) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blueline drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.</u></p> <p style="padding-left: 60px;"><u>(b) One set of measured drawings shall be submitted for archival storage with the City</u></p>	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).</u></p> <p><u>B. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.</u></p> <p><u>C. In addition to the Documentation Program, the Applicant shall comply with any other conditions contained in the Site Development Permit, as approved through the City's Historic Regulations contained in Chapter 14, Article 3, Division 2, which shall include but not be limited to one or more actions prepared and adopted by the HRB for demolition of the Local Register Resource.</u></p>	
<p>Impact HIST-B.1: Development in downtown could impact significant archaeological resources. (Direct and Cumulative)</p>	<p><i>Mitigation Measure HIST-B.1-1:</i> If the potential exists for archaeological resources, the following measures shall be implemented.</p> <p><u>I. Prior to Permit Issuance</u></p> <p><u>A. Construction Plan Check</u></p> <p><u>1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for Archaeological Monitoring and Native American monitoring, if applicable, have been noted on the appropriate construction documents.</u></p> <p><u>B. Letters of Qualification have been submitted to CCDC</u></p> <p><u>1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</u></p> <p><u>2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.</u></p> <p><u>3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program.</u></p>	<p>Significant (Direct and Cumulative)</p>

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	<p><u>II. Prior to Start of Construction</u></p> <p><u>A. Verification of Records Search</u></p> <ol style="list-style-type: none"> <u>1. The PI shall provide verification to CCDC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</u> <u>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</u> <u>3. The PI may submit a detailed letter to CCDC requesting a reduction to the ¼ mile radius.</u> <p><u>B. PI Shall Attend Precon Meetings</u></p> <ol style="list-style-type: none"> <u>1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Archaeologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.</u> <ol style="list-style-type: none"> <u>(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</u> <u>2. Archaeological Monitoring Plan (AMP)</u> <ol style="list-style-type: none"> <u>(a) Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Plan which describes how the monitoring would be accomplished for approval by CCDC. The AMP shall include an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.</u> <u>(b) The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</u> <u>(c) Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.</u> <u>(d) The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction</u> 	

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	<p style="text-align: center;"><u>documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.</u></p> <p><u>III. During Construction</u></p> <p><u>A. Monitor Shall be Present During Grading/Excavation/Trenching</u></p> <ol style="list-style-type: none"> <u>1. The monitor shall be present full-time during soil remediation and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.</u> <u>2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to CCDC.</u> <u>3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.</u> <p><u>B. Discovery Notification Process</u></p> <ol style="list-style-type: none"> <u>1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.</u> <u>2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</u> <u>3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.</u> <p><u>C. Determination of Significance</u></p> <ol style="list-style-type: none"> <u>1. The PI and Native American representative, if applicable, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.</u> <ol style="list-style-type: none"> <u>(a) The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required.</u> <u>(b) If the resource is significant, the PI shall submit an Archaeological Data Recovery</u> 	

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	<p><u>Program (ADRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.</u></p> <p><u>(c) If resource is not significant, the PI shall submit a letter to CCDC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</u></p> <p><u>IV. Discovery of Human Remains</u></p> <p><u>If human remains are discovered, work shall halt in that area and the following procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</u></p> <p><u>A. Notification</u></p> <ol style="list-style-type: none"> <u>1. Archaeological Monitor shall notify the RE or BI as appropriate, CCDC, and the PI, if the Monitor is not qualified as a PI.</u> <u>2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.</u> <p><u>B. Isolate discovery site</u></p> <ol style="list-style-type: none"> <u>1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.</u> <u>2. The Medical Examiner, in consultation with the PI, shall determine the need for a field examination to determine the provenience.</u> <u>3. If a field examination is not warranted, the Medical Examiner shall determine with input from the PI, if the remains are or are most likely to be of Native American origin.</u> <p><u>C. If Human Remains are determined to be Native American</u></p> <ol style="list-style-type: none"> <u>1. The Medical Examiner shall notify the Native American Heritage Commission (NAHC). By law, only the Medical Examiner can make this call.</u> <u>2. The NAHC shall contact the PI within 24 hours or sooner, after Medical Examiner has completed coordination.</u> <u>3. NAHC shall identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information..</u> <u>4. The PI shall coordinate with the MLD for additional consultation.</u> <u>5. Disposition of Native American Human Remains shall be determined between the MLD</u> 	

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	<p><u>and the PI, if:</u></p> <p><u>(a) The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 24 hours after being notified by the Commission; OR;</u></p> <p><u>(b) The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.</u></p> <p><u>D. If Human Remains are not Native American</u></p> <p><u>1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.</u></p> <p><u>2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).</u></p> <p><u>3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with CCDC, the applicant/landowner and the Museum of Man.</u></p> <p><u>V. Night Work</u></p> <p><u>A. If night work is included in the contract</u></p> <p><u>1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.</u></p> <p><u>2. The following procedures shall be followed.</u></p> <p><u>(a) No Discoveries</u></p> <p><u>In the event that no discoveries were encountered during night work, the PI shall record the information on the CSVr and submit to CCDC via fax by 9am the following morning, if possible.</u></p> <p><u>(b) Discoveries</u></p> <p><u>All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.</u></p> <p><u>(c) Potentially Significant Discoveries</u></p> <p><u>If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific</u></p>	

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Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>arrangements have been made.</u></p> <p><u>B. If night work becomes necessary during the course of construction</u></p> <p style="padding-left: 20px;"><u>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</u></p> <p style="padding-left: 20px;"><u>2. The RE, or BI, as appropriate, shall notify CCDC immediately.</u></p> <p><u>C. All other procedures described above shall apply, as appropriate.</u></p> <p><u>VI. Post Construction</u></p> <p><u>A. Submittal of Draft Monitoring Report</u></p> <p style="padding-left: 20px;"><u>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring.</u></p> <p style="padding-left: 40px;"><u>(a) For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.</u></p> <p style="padding-left: 40px;"><u>(b) Recording sites with State of California Department of Parks and Recreation</u> <u>The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</u></p> <p style="padding-left: 20px;"><u>2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</u></p> <p style="padding-left: 20px;"><u>3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.</u></p> <p style="padding-left: 20px;"><u>4. CCDC shall provide written verification to the PI of the approved report.</u></p> <p style="padding-left: 20px;"><u>5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</u></p> <p><u>B. Handling of Artifacts and Submittal of Collections Management Plan, if applicable</u></p> <p style="padding-left: 20px;"><u>1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.</u></p> <p style="padding-left: 20px;"><u>2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is</u></p>	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>identified as to species; and that specialty studies are completed, as appropriate.</u></p> <p style="text-align: center;"><u>3. The PI shall submit a Collections Management Plan to CCDC for review and approval for any project which results in a substantial collection of historical artifacts.</u></p> <p style="text-align: center;"><u>C. Curation of artifacts: Accession Agreement and Acceptance Verification</u></p> <p style="text-align: center;"><u>1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with CCDC and the Native American representative, as applicable.</u></p> <p style="text-align: center;"><u>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.</u></p> <p style="text-align: center;"><u>D. Final Monitoring Report(s)</u></p> <p style="text-align: center;"><u>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.</u></p> <p style="text-align: center;"><u>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution.</u></p> <p>Note: The original text for Mitigation Measure HIST-B.1-1 that was included in the DEIR has been replaced by the above text. The original deleted language appears in Section 5.3.4 of this FEIR.</p>	
LAND USE (LND)		
<p>Impact LU-B.1: Noise generated by major ballpark events could cause interior noise levels in noise-sensitive uses (e.g. residential and hotels) within four blocks of the ballpark to exceed the 45 dB(A) limit mandated by Title 24 of the California Code. (Direct)</p>	<p>Implementation of the noise attenuation measures required by Mitigation Measure NOI-B.2-1 would reduce interior noise levels to 45 dB (A) CNEL and reduce potential impacts to below a level of significance.</p>	<p>Not Significant (Direct)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
<p>Impact LU-B.2: Noise generated by I-5 and highly traveled grid streets could cause noise levels in noise-sensitive uses not governed by Title 24 to exceed 45 dB(A). (Direct)</p>	<p>Completion of noise studies and implementation of appropriate noise attenuation required by Mitigation Measures NOI-B.1-1 and NOI-C.1.1 would reduce land use compatibility impacts from freeway noise but not to below a level of significance.</p>	<p>Not Significant (Interior) (Direct) Significant (Exterior) (Direct)</p>
<p>Impact LU-B.3: Noise levels in downtown areas within the 65 CNEL contour of SDIA could exceed 45 dB(A) for noise sensitive uses not covered by Title 24. (Direct)</p>	<p>Completion of noise studies and implementation of appropriate noise attenuation required by Mitigation Measure NOI-B.1-1 would reduce interior noise levels in new development to within acceptable limits but would be unable to reduce exterior noise levels to within acceptable limits.</p>	<p>Not Significant (Interior) (Direct) Significant (Exterior) (Direct)</p>
<p>Impact LU-B.4: Noise generated by train horns, engines and wheels as well as bells at crossing gates would significantly disrupt sleep of residents along the railroad tracks. (Direct)</p>	<p><i>Mitigation Measure LU-B.4.1:</i> Prior to approval of a Building Permit which would expose habitable rooms to disruptive railroad noise, an acoustical analysis shall be performed. The analysis shall determine the expected exterior and interior noise levels related to railroad activity. As feasible, noise attenuation measures shall be identified which would reduce noise levels to 45 dB(A) CNEL or less in habitable rooms. Recommended measures shall be incorporated into building plans before approval of a Building Permit.</p>	<p>Significant (Direct)</p>
<p>Impact LU-B.5: Ballpark lighting would interrupt sleep in residences and hotels within two blocks of the ballpark. (Direct)</p>	<p><i>Mitigation Measure LU-B.5.1:</i> Prior to approval of a Building Permit which would result in a light sensitive use within a two-block radius of Petco Park, the applicant shall provide a lighting study that demonstrates to the satisfaction of CCDC that habitable rooms would be equipped with light attenuation measures which would allow occupants to reduce night-time light levels to 2.0 foot-candles or less.</p>	<p>Not Significant (Direct)</p>
<p>Impact LU-B.6: Improper sanitation and trash associated with transient activities could result in physical impacts on surrounding neighborhoods. (Direct and Cumulative)</p>	<p>No feasible mitigation measures are available..</p>	<p>Significant (Direct and Cumulative)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
Noise(NOI)		
<p>Impact NOI-A.1: Traffic volume increases on select grid streets resulting from future downtown development would substantially increase (more than 3 dB(A) CNEL) noise levels along affected streets. (Direct and Cumulative)</p>	<p>No feasible mitigation measures are available to reduce the significant increase in traffic noise on affected roadway segments.</p>	<p>Significant (Direct and Cumulative)</p>
<p>Impact NOI-B.1: Noise generated by I-5 and highly traveled grid streets could cause interior noise levels in noise-sensitive uses to exceed 45 dB(A) CNEL. (Direct)</p>	<p><i>Mitigation Measure NOI-B.1-1:</i> Prior to approval of a Building Permit for any residential, hospital, or hotel within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.</p>	<p>Not Significant (Direct)</p>
<p>Impact NOI-B.2: Noise generated by major ballpark events could cause interior noise levels in noise-sensitive uses (e.g. residential and hotels) within four blocks of the ballpark to exceed the 45 dB(A) CNEL limit mandated by Title 24 of the California Code. (Direct)</p>	<p><i>Mitigation Measure NOI-B.2-1:</i> Prior to approval of a Building Permit for any noise-sensitive land uses within four blocks of Petco Park, an acoustical analysis shall be performed. The analysis shall confirm that architectural or other design features are included in the design which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.</p>	<p>Not Significant (Direct)</p>
<p>Impact NOI-C.1: Exterior required outdoor open space in residential could experience traffic noise levels in excess 65 dB(A) CNEL. (Direct)</p>	<p><i>Mitigation Measure NOI-C.1-1:</i> Prior to approval of a Development Permit for any residential development within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any required outdoor open space areas would be exposed to noise levels in excess of 65 dB(A) CNEL. . Provided noise attenuation would not interfere with the primary purpose or design intent of the exterior use, measures shall be included in building plan, to the extent feasible</p>	<p>Significant (Direct)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
<p>Impact NOI-C.2: Aircraft noise associated with San Diego International Airport would impact required outdoor open space in residential development located in the northern portion of downtown. (Direct)</p>	No feasible mitigation measures are available to reduce outdoor aircraft noise.	Significant (Direct)
<p>Impact NOI-D.1: Recreation areas within public parks and plazas may experience traffic noise levels in excess 65 dB(A) CNEL. (Direct)</p>	<p><i>Mitigation Measure NOI-D.1-1:</i> Prior to approval of a Development Permit for any public park or plaza within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any recreation areas would be exposed to noise levels in excess of 65 dB(A) CNEL. Provided noise attenuation would not interfere with the intended recreational use or park design intent, measures shall be included, to the extent feasible.</p>	Significant (Direct)
<p>Impact NOI-D.2: Aircraft noise associated with San Diego International Airport would impact public parks and plazas located in the northern portion of downtown. (Direct)</p>	No feasible mitigation measures are available to reduce outdoor aircraft noise.	Significant (Direct)
PALEONTOLOGICAL RESOURCES (PAL)		
<p>Impact PAL-A.1: Excavation in geologic formations with a moderate to high potential for paleontological resources could have an significant impact on these resources, if present. (Direct)</p>	<p><i>Mitigation Measure PAL-A.1-1:</i> In the event the Secondary Study indicates the potential for significant paleontological resources, the following measures shall be implemented as determined appropriate by CCDC.</p> <p><u>I. Prior to Permit Issuance</u></p> <p style="margin-left: 20px;"><u>A. Construction Plan Check</u></p> <p style="margin-left: 40px;">1. <u>Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, Centre City Development Corporation (CCDC) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.</u></p>	Not Significant (Direct)

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>B. Letters of Qualification have been submitted to CCDC</u></p> <ol style="list-style-type: none"> <u>1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.</u> <u>2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.</u> <u>3. Prior to the start of work, the applicant shall obtain approval from CCDC for any personnel changes associated with the monitoring program.</u> <p>II. <u>Prior to Start of Construction</u></p> <p><u>A. Verification of Records Search</u></p> <ol style="list-style-type: none"> <u>1. The PI shall provide verification to CCDC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</u> <u>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</u> <p><u>B. PI Shall Attend Precon Meetings</u></p> <ol style="list-style-type: none"> <u>1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.</u> <ol style="list-style-type: none"> <u>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</u> <u>2. Identify Areas to be Monitored</u> <ol style="list-style-type: none"> <u>a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to</u> 	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).</u></p> <p>3. <u>When Monitoring Will Occur</u></p> <p>a. <u>Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.</u></p> <p>b. <u>The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.</u></p> <p>III. <u>During Construction</u></p> <p>A. <u>Monitor Shall be Present During Grading/Excavation/Trenching</u></p> <p>1. <u>The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.</u></p> <p>2. <u>The monitor shall document field activity via the Consultant Site Visit Record (CSVSR). The CSVSR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of any discoveries. The RE shall forward copies to CCDC.</u></p> <p>3. <u>The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.</u></p> <p>B. <u>Discovery Notification Process</u></p> <p>1. <u>In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.</u></p> <p>2. <u>The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</u></p>	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.</u></p> <p><u>C. Determination of Significance</u></p> <p><u>1. The PI shall evaluate the significance of the resource.</u></p> <p><u>a. The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.</u></p> <p><u>b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.</u></p> <p><u>c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to CCDC unless a significant resource is encountered.</u></p> <p><u>d. The PI shall submit a letter to CCDC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.</u></p> <p><u>IV. Night Work</u></p> <p><u>A. If night work is included in the contract</u></p> <p><u>1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.</u></p> <p><u>2. The following procedures shall be followed.</u></p> <p><u>a. No Discoveries</u></p> <p><u>(1) In the event that no discoveries were encountered during night work, The PI shall record the information on the CSVr and submit to CCDC via fax by 9am the following morning, if possible.</u></p> <p><u>b. Discoveries</u></p> <p><u>(1) All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.</u></p>	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>c. Potentially Significant Discoveries</u></p> <p><u>(1) If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.</u></p> <p><u>d. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</u></p> <p><u>B. If night work becomes necessary during the course of construction</u></p> <p><u>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</u></p> <p><u>2. The RE, or BI, as appropriate, shall notify CCDC immediately.</u></p> <p><u>C. All other procedures described above shall apply, as appropriate.</u></p> <p><u>VI. Post Construction</u></p> <p><u>A. Submittal of Draft Monitoring Report</u></p> <p><u>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring.</u></p> <p><u>a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.</u></p> <p><u>b. Recording Sites with the San Diego Natural History Museum</u></p> <p><u>(1) The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.</u></p> <p><u>2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</u></p> <p><u>3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.</u></p> <p><u>4. CCDC shall provide written verification to the PI of the approved report.</u></p> <p><u>5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</u></p>	

**TABLE 1.3-1
Significant Impacts and Mitigation Measures**

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>B. Handling of Fossil Remains</u></p> <ol style="list-style-type: none"> <u>1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.</u> <u>2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate</u> <p><u>C. Curation of fossil remains: Deed of Gift and Acceptance Verification</u></p> <ol style="list-style-type: none"> <u>1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.</u> <u>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.</u> <p><u>D. Final Monitoring Report(s)</u></p> <ol style="list-style-type: none"> <u>1. The PI shall submit two copies of the Final Monitoring Report to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.</u> <u>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution.</u> 	

Note: The original text for Mitigation Measure HIST-A.1-1 that was included in the DEIR has been replaced by the above text. The original deleted language appears in Section 5.12.4 of this FEIR.

TRAFFIC AND CIRCULATION

Impact TRF-A.1.1:
Increased traffic on grid streets from downtown development would result in unacceptable levels of service on specific roadway intersections and/or segments within downtown. (Direct and Cumulative)

Mitigation Measure TRF-A.1.1-1: At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall conduct a downtown-wide evaluation of the ability of the grid street system to accommodate traffic within downtown as well as the following roadway segment in the surrounding neighborhood: Imperial Avenue (between 25th Street and of 28th Street). In addition to identifying roadway intersections or segments which may need immediate attention, the evaluation shall identify roadways which may warrant interim observation prior to the next 5-year evaluation. The need for roadway improvements shall be based upon deterioration to Level of Service F and/or other standards established by CCDC, in cooperation with the City Engineer. In completing these studies, the potential improvements identified in Appendix C of the traffic study and Tables 5.2-20 and 21 of

Significant (Direct and Cumulative)

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p>the EIR will be reviewed to determine whether these or other actions are required to improve traffic flow along affected roadway corridors. As necessary, potential improvements shall also be determined for the identified roadway segments within the surrounding neighborhoods. In selecting improvements, CCDC shall review the effect the improvement may have on pedestrian or bicycle activities whenever pedestrians must traverse any of the following roadway conditions:</p> <ul style="list-style-type: none"> • Five or more lanes at any intersection (excepting boulevards); • Three or more travel lanes on residential streets, or crossing roadways with four or more lanes; • Four or more travel lanes on multi-function streets, or crossing roadways with four or more travel lanes; or • Dual right-turn lanes. <p><u>In order to determine if the roadway improvements included in the current five-year CIP, or the equivalent, are sufficient to accommodate developments, a traffic study would be required for large projects. The threshold to be used for determining the need for a traffic study shall reflect the traffic volume threshold used in the Congestion Management Program (CMP). The CMP stipulates that any activity forecasted to generate 2,400 or more daily trips (200 or more equivalent peak hour trips).</u></p>	
	<p><u>Mitigation Measure TRF-A.1.1-2: Prior to approval of any development which would generate a sufficient number of trips to qualify as a large project under the Congestion Management Program (i.e. more than 2,400 daily trips, or 200 trips during a peak hour period), a traffic study shall be completed as part of the Secondary Study process. The traffic study shall be prepared in accordance with City's Traffic Impact Study Manual. If the traffic study indicates that roadways substantially affected by the project would operate at LOS F with the addition of project traffic, the traffic study shall identify improvements to grid street segments and/or intersections which would be required within the next five years to achieve an acceptable LOS or reduce congestion, to the extent feasible. If the needed improvements are already included in CCDC's CIP, or the equivalent, no further action shall be required. If the any of the required improvements are not included in the CIP, or not expected within five years of project completion, CCDC shall amend the CIP, within one year of project approval, to include the required improvements and assure that they will be implemented within five years of project completion. At CCDC's discretion, the developer may be assessed a pro-rated share of the cost of improvements.</u></p>	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u><i>Mitigation Measure TRF-A.1.1-3: Upon adoption of the Community Plan, CCDC and the City shall update the Centre City Public Facilities Financing Plan (PFFP) to include a transportation element to be completed within six (6) months. The update to the Centre City PFFP required by this mitigation measure shall include the following:</i></u></p> <ul style="list-style-type: none"> a) <u>The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities;</u> b) <u>The PFFP update will specify transportation improvements as identified on Figure 7.2 of the Community Plan and further described on Table 5.2-21 and Figure 5.2-8 of this FEIR;</u> c) <u>The PFFP update will specifically include capital improvements to the downtown transit network as identified on page 7-10 and Figure 7-4 of the Community Plan and further described in Table 5.2-22 of this FEIR;</u> d) <u>For this mitigation measure, the PFFP update will not include freeway improvements, freeway ramps and will not now or in the future include transit operation or maintenance improvements as these are specifically prohibited in Government Code 66000, which are addressed in Mitigation Measure TRF-A.2.1-2 below;</u> e) <u>The PFFP update will set forth a timeline and other agreed-upon relevant criteria for implementation of each improvement identified in items (b) and (c) above;</u> f) <u>The PFFP update will identify the total estimated costs for each improvement in items (b) and (c) above as provided for by CCDC and reviewed and confirmed by the City's Transportation Planning and Facilities Financing Section of the Planning Department;</u> g) <u>The PFFP update will include the establishment of a fair-share contribution from downtown development for improvement in items b) and c) above, through a Developer Impact Fee or secure, local alternative funding sources, in a manner that will comply with applicable law;</u> h) <u>Prior to adoption by the City of San Diego Council, the PFFP will be sent to the Entities for their review and comment;</u> i) <u>CCDC and the Facilities Financing Section of the Planning Department shall seek adoption of the PFFP update at a public hearing before the San Diego City Council within six months after adoption of the Community Plan Update. As extension not to exceed three (3) months shall be</u> 	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p style="text-align: center;"><u>granted upon mutual consent of the Entities.</u></p> <p style="text-align: center;"><u>The failure or refusal of any Entity other than CCDC or the City, to cooperate in the implementation of this mitigation measure, shall not constitute a failure of CCDC or the City to implement this mitigation measure; however, the City and CCDC shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.</u></p>	
<p>Impact TRF-A.1.2: Increased traffic from downtown development on certain streets surrounding downtown would result in an unacceptable level of service. (Direct and Cumulative)</p>	<p>Implementation of Mitigation Measure TRF-A.1.1-1 would also reduce impacts on surrounding roadways but not necessarily below a level of significance.</p>	<p>Significant (Direct and Cumulative)</p>
<p>Impact TRF-A.2.1: Additional traffic on freeway segments and ramps serving downtown associated with future downtown development would result in unacceptable delays and level of service. (Direct and Cumulative)</p>	<p><u>Mitigation Measure TRF-A.2.1-1: Upon adoption of the Community Plan, CCDC shall initiate a multi-jurisdictional effort to develop a detailed, enforceable plan [the Plan] that will identify transportation improvements that would reduce congestion on I-5 through downtown, as well as identify funding sources including federal, state, regional and local funding and which may also include fair share contributions by development as well as other mechanisms based on a nexus study. The process and Plan required by this mitigation measure shall include the following.</u></p> <ol style="list-style-type: none"> a) <u>The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, Caltrans, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities.</u> b) <u>The Plan will specifically identify physical and operational improvements to I-5, other freeways, relevant arterial roads and transit facilities [the Improvements], that are focused on specific transportation impacts created by downtown development, and will also identify the specific responsibilities of each Entity for the construction, maintenance and financing for each Improvement. The Plan may also identify other improvements necessary to address regional transportation needs, but for purposes of this mitigation measure, the Improvements included in the Plan need only be designed to mitigate the impacts created by downtown development.</u> c) <u>The Plan will set forth a timeline and other agreed-upon relevant criteria for implementation of each Improvement.</u> 	<p>Significant (Direct and Cumulative)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<ul style="list-style-type: none"> d) <u>The Plan will identify the total estimated costs for each such Improvement, including construction, maintenance and operational costs [the Total Costs], and the responsibility of each Entity for both implementation and funding for such Total Costs.</u> e) <u>The Plan will include the parameters for any fair-share or development impact fee programs (or the like) to be implemented, that would require private and/or public developers to contribute to the Total Costs, in a manner that will comply with applicable law.</u> f) <u>In developing the Plan, the Entities shall also consider ways in which the Improvements can be coordinated with existing local and regional transportation and facilities financing plans and programs, in order to avoid duplication of effort and expenditure; however, the existence of such other plans and programs shall not relieve the Entities of their collective obligation to develop and implement the Plan as set forth in this mitigation measure. Nothing in the Plan shall be construed as relieving any Entity (or any other entity) from its independent responsibility (if any) for the planning, funding, construction, maintenance or operation of any transportation improvement.</u> g) <u>Upon adoption of the Plan by the City Council, SANDAG, MTS and Caltrans will also seek endorsement of same through their government structures.</u> h) <u>CCDC shall seek adoption of the Plan at a public hearing before the City Council within one year of the initiation of the multi-jurisdictional effort to develop the Plan. CCDC shall report in writing, and at a public hearing before the City Council and SANDAG (if SANDAG agrees to place such a report on its agenda), regarding the progress made to develop the Plan, within six months of the first meeting of the entities. Thereafter, CCDC shall report to the City Council at least annually regarding the progress of the Plan, for a period of not less than five years, which may be extended at the request of the City Council.</u> i) <u>The Plan shall also expressly include each Entity's pledge that it will cooperate with CCDC in making the required reports to the Agency, including the presence and participation of a responsible representative of the Entity at all public hearings called for the purpose of reviewing the progress of development and implementation of the Plan.</u> j) <u>The PFFP shall be amended to include any projects in the Plan that CCDC and the City Council determine are appropriate for inclusion in the PFFP. The amendment to the PFFP to accommodate such appropriate improvements shall be processed for adoption at the time the Plan is submitted for adoption to the City Council.</u> 	

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p><u>The failure or refusal of any Entity other than CCDC or the City to cooperate in the implementation of this mitigation measure shall not constitute a failure of CCDC or the City to implement this mitigation measure; however, the CCDC and City shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.</u></p> <p><u>Further, if the City Council or Redevelopment Agency finds that (1) any of the Entities fails or has failed to cooperate in the development or implementation of this Plan, or (2) there is insufficient funding for implementation of the improvements in accord with the Plan, or (3) development downtown has significantly outpaced the development of infrastructure needed to support the development, the Council/Agency shall thereafter review the status of the Plan and its improvements, to determine whether substantial evidence shows that any of the conditions listed in Public Resources Code section 21166 and Guidelines section 15162 exist, so that additional environmental documentation would be required. In any event, the annual progress report delivered by CCDC pursuant to this mitigation measure shall include an evaluation of whether any of these conditions exist.</u></p>	
<p>Impact TRF-A.2.2: Elimination of Cedar St. off-ramp would impact other freeway ramps by redirecting traffic to other offramps serving downtown. (Direct)</p>	<p><i>Mitigation Measure TRF A.2.2-1:</i> Prior to elimination of the Cedar Street off-ramp from I-5, a traffic study shall be done by CCDC in consultation with the City of San Diego and Caltrans to determine the potential effects associated with elimination of the off-ramp and the conversion of Cedar Street from one- to two-way. The report shall also identify roadway modifications that would minimize potential impacts on local surface streets and I-5.</p>	<p>Significant (Direct)</p>
<p>Impact TRF-D.1: Parking demand would exceed the supply generated by proposed parking requirements which could increase parking demand in areas surrounding downtown. (Direct and Cumulative)</p>	<p><i>Mitigation Measure TRF-D.1-1:</i> At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall <u>evaluate the parking supply and demand within the downtown area as well as</u> assess the amount of parking generated by downtown development in residential areas within a quarter-mile radius of downtown. <u>The evaluations will include an inventory of the number of public and private parking spaces available for public parking within downtown and the residential neighborhoods within a quarter-mile radius of downtown. The evaluation shall determine the current as well as anticipated parking supply and demand during the ensuing five-year period. Based on the evaluation, Upon adoption of the proposed Community Plan, CCDC will conduct an initial inventory to establish a baseline for determining additional impacts from downtown development. During the subsequent 5 year assessments, CCDC shall determine if the discrepancy between demand and supply impact has increased to a level which warrants ameliorative actions which may include but not be limited to: (1) constructing new public parking, (2) implementing specific shared parking programs with private parking facilities, (3) implementing parking meter programs that respond to changes in the parking demand which occur during a 24-hour period and/or (4) implementing residential permit</u></p>	<p>Significant (Direct and Cumulative)</p>

TABLE 1.3-1
Significant Impacts and Mitigation Measures

IMPACT DESCRIPTION	MITIGATION MEASURE(S)	SIGNIFICANCE OF IMPACT AFTER MITIGATION
	<p>parking programs. Any actions identified during the parking evaluation shall be incorporated into CCDC's and include parking facilities determined to be required in its Capital Improvement Program, if appropriate, or carried out through some other form of enforcement such as amending Planned District Ordinances or other regulatory programs dealing with parking. other implementation program.</p>	
VISUAL QUALITY (VIS)		
<p>Impact VIS-B.1: Increased development in East Village would interrupt views of San Diego Bay and the Coronado Bay Bridge from public viewing areas outside of downtown (e.g. Balboa Park and the I-5/SR-94 interchange). (Direct)</p>	<p>No mitigation is feasible.</p>	<p>Significant (Direct)</p>
WATER QUALITY (WQ)		
<p>Impact WQ-A.1: Surface runoff water pollution resulting from future downtown development would impact water quality in San Diego Bay. (Cumulative)</p>	<p>Implementation of federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments would reduce but not avoid an increase in cumulative water pollution effects.</p>	<p>Significant (Cumulative)</p>

**TABLE 1.3-2
Relevant Goals And Policies
From the Downtown Community Plan**

Environmental Issue	Goal/Policy
AIR QUALITY	
	Goal 7.5-G-1: Encourage transportation demand management strategies to minimize traffic contributions from new and existing development.
	Policy 7.5-P-1: Encourage TDM approaches for various SANDAG programs including: <ul style="list-style-type: none"> • Rideshare and carpool in all levels of government with offices and facilities downtown as well as other major downtown employers. • Make available designated preferential, conveniently located car/vanpool parking areas. • Provide transit reimbursement and other benefits to other users of non-motorized travel. • Establish a car/vanpool matching service that could use mechanisms such as sign-ups at individual buildings, or via electronic mail or internet website. • Continue SANDAG’s guaranteed ride home for workers who carpool. • Work with public and private entities to encourage car share programs in downtown. • Provide flextime and telecommuting opportunities to employees.
CULTURAL RESOURCES	
	Goal 9.1-G-1: Protect significant historic resources to communicate downtown’s heritage.
	Goal 9.1-G-2: Encourage the rehabilitation and reuse of designated historic properties.
	Goal 9.2-G-1: Integrate designated historic resources into the downtown fabric while achieving policies for significant development and population intensification.
	Goal 9.2-G-3: Keep history alive through interpretive programs.
	Policy 9.2-P-1: Where feasible and not in conflict with achievement of development and population intensity policies, i ncorporate elements of buildings in new projects to impart heritage.
	Policy 9.2-P-3: Promote the adaptive reuse of intact buildings (designated or not) and/or significant elements, as a cultural and sustainability goal.
	Policy 9.2-P-4: Encourage the historic interpretation of various cultural resources as they are established over time, including but not limited to Asian-Pacific, African-American, warehouse buildings, etc.
GEOLOGY	
	Goal 13.1-G-1: Maintain a safe and livable environment by mitigating and avoiding risks posed by seismic conditions.
	Policy 13.1-P-1: Implement all seismic-safety development requirements, including the Alquist-Priolo Zone Act, City requirements for the Downtown Special Fault Zone and areas subject to potential liquefaction, and building codes.
	Policy 13.1-P-2: Coordinate with the City in enforcement of Ordinance 18451 for unreinforced masonry (URM) building reinforcement, and require appropriate reinforcement of URM buildings integrated into new development.
	Policy 13.1-P-3: Where active faults are found and building cannot take place, work closely with developers to provide publicly-accessible open space.

TABLE 1.3-2
Relevant Goals And Policies
From the Downtown Community Plan

Environmental Issue	Goal/Policy
LAND USE	
	<u>Policy 3.2-5: Restrict building intensities underneath the approach path to Lindbergh Field consistent with the Airport Land Use Compatibility Plan (ALUCP)</u>
	Goal 3.6-G-1: Allow large facilities only in appropriate areas, and provided that projects do not interrupt community fabric, street grid, designated public views, or the viability of Neighborhood Centers, and that facilities are designed to be compatible in scale and texture with the surrounding uses.
	Policy 3.6-P-1: Ensure that all large facilities maintain or reinstate the street grid, and through design and development standards, that they are seamlessly integrated with the surroundings.
	Goal 4.1-G-2: Provide public open space within walking distance of all residents and employees.
	Goal 4.1-G-3: Improve accessibility to recreational, leisure, and cultural opportunities on the waterfront and at Balboa Park.
	Policy 4.1-P-8: Pursue new smaller open spaces – including public plazas and places, fountains, and pocket parks – on portions of blocks throughout downtown and on geologic faults to supplement the larger public open spaces, provide local focus points, and diversify the built environment.
	Policy 4.1-P-9: Improve the Green Streets as an essential element of the open space system – as connections to the waterfront, Balboa Park, activity centers, parks and plazas; as tree-lined open spaces; and as continuous recreational paths.
	Policy 4.1-P-10: Require private common open spaces as part of all large new residential developments.
	Goal 5.3-G-4: Ensure uninterrupted sunlight during designated periods on all major parks, and maintain standards to ensure adequate sunlight on sidewalks and streets in Neighborhood Centers and residential areas.
	Policy 5.3-P-1: Restrict building heights as follows: <ul style="list-style-type: none"> • Around parks to maintain uninterrupted sunlight with specific criteria delineated in the PDO: • In Marina and Gaslamp for sunlight and urban design considerations; • Stepping down towards the water in the North Embarcadero area; • Surrounding the CAC; and • In the <u>airport approach overlay-zone</u> to Lindbergh Field, as required by the Federal Aviation Administration (FAA).
NOISE	
	Policy 13.4-P-3: Require construction techniques that mitigate interior noise near freeways – in areas of 65 dB (A) CNEL or greater – pursuant the City of San Diego’s Municipal Code, such as greater insulation, reinforced windows, ventilation systems, and limited outdoor exposure.
TRANSPORTATION CIRCULATION, ACCESS, AND PARKING	
	Goal 7.1-G-2: Maintain, reestablish and enhance the street grid, to promote flexibility of movement, preserve and/or open view corridors, and retain the historic scale of the streets.
	Policy 7.1-P-1: Implement the street typology shown in Figure 7-1, in the cross-sections and described in Box 7-1 of the Community Plan when carrying out streetscape improvements.

TABLE 1.3-2
Relevant Goals And Policies
From the Downtown Community Plan

Environmental Issue	Goal/Policy
	Policy 7.1-P-2: Prohibit and discourage any interruption of the street grid.
	Policy 7.1-P-3: Forge new connections and view corridors as larger sites are redeveloped, opening rights of way at the waterfront, through the Civic Center, and along Cedar Street, among others. Require full vehicle and pedestrian access in new connections except where precluded by existing plans and projects.
	<u>Policy 7.1-P-4: Work with appropriate transportation agencies to implement freeway improvements in and near downtown.</u>
	Policy 7.2-P-2: Use traffic-calming measures to control speeds on all freeway couplets-First/Second Avenues, Tenth/Eleventh Avenues, F/G Streets, Fourth/Fifth Avenues– while optimizing traffic volumes during peak hour.
	Policy 7.2-P-3: Require bike racks and locking systems in all residential projects, multi-tenant retail and office projects, and government and institutional uses.
	Policy 7.2-P-4: In Pedestrian Priority Zones; <ul style="list-style-type: none"> • Undertake strategic streetscape improvements (such as sidewalk widening, bulbouts, enhanced lighting and signage); • Lengthen traffic signal walk times for pedestrians, and explore feasibility of “all walk” signalization at intersections with heavy pedestrian flow; and • Accept lower levels of automobile traffic level of service.
	Policy 7.3-P-5: Enhance streetscapes within transit corridors to increase attractiveness for users and promote shared transit, pedestrian, and cyclist use.
	Goal 7.4-G-1: Promote quality of life and business viability by allowing the provision of parking to serve growing needs, while avoiding excessive supplies that discourage transit ridership and disrupt urban fabric.
	Goal 7.4-G-2: Site and design new parking structures to accommodate parking needs from multiple land uses to the extent possible and allow shared parking where possible.
	Policy 7.4-P-1: Require a certain portion of on-site motorcycle and bicycle parking in addition to automobile spaces.
	Policy 7.4-P-2: Emphasize shared parking approaches, including: <ul style="list-style-type: none"> • Development of parking facilities that serve multiple uses, to enable efficient use of space over the course of the day; • Parking under new parks that are full-block or larger in size, where not limited by geologic or other constraints; and • <u>Enhanced on-street parking through restriping streets where appropriate.</u>
	Policy 7.4-P-3: Allow off-site and/or shared parking arrangements where appropriate to maximize efficient use of parking resources.
	Policy 7.4-P-4: Work with developers of high-intensity developments unable to accommodate parking on site to allow development/use of parking under public parks, where appropriate and feasible.
	Policy 7.4-P-6: Ensure that all public parking structures maximize the potential for subterranean parking and incorporate other uses at higher floors where feasible. Explore the use of technological advancements to improve cost/parking efficiencies in new public garages.
	Goal 7.5-G-1: Encourage transportation demand management strategies to minimize traffic contributions from new and existing development.
	Goal 7.5-G-2: Cooperate with regional transportation planning and demand management programs, and with local agencies for joint use arrangements of transportation and parking facilities during evenings, weekends, and holidays.

TABLE 1.3-2
Relevant Goals And Policies
From the Downtown Community Plan

Environmental Issue	Goal/Policy
	Policy 7.5-P-1: Encourage TDM approaches and various SANDAG programs to: <ul style="list-style-type: none"> • Rideshare and carpool in all levels of government with offices and facilities downtown as well as other major downtown employers. • Make available designated preferential, conveniently located car/vanpool parking areas. • Provide transit reimbursement and other benefits to other users of non-motorized travel. • Establish a car/vanpool matching service that could use mechanisms such as sign-ups at individual buildings, or via electronic mail or internet website. • Continue SANDAG’s guaranteed ride home for workers who carpool. • Work with public and private entities to encourage car share programs in downtown. • Provide flextime and telecommuting opportunities to employees.
VISUAL QUALITY	
	Policy 5.4-P-3: Protect public views of the water, and re-establish water views in the corridors shown in Figure 5-1 of the Downtown Community Plan, with the following two-tiered system: <ul style="list-style-type: none"> • Within the system established in <i>Chapter 7: Transportation</i> of the Downtown Community Plan, including streets and new street segments to be created when future development proceeds (such as G Street); and, • In instances where the view corridors have been designated on Figure 5-1 of the Downtown Community Plan but a street will not be built, view/public access easements or dedications shall be required where the ground-level right-of-way width will be the same average dimension as the existing street right-of-way for street segments comprising the view corridor, including Date, Beech, A, B, C, and E streets.
	Policy 5.1-P-5: Prohibit the construction of “sky-walks” or any visible structure in view corridors. Discourage “sky-walks” above all streets. If they occur, make them minimal in size and encourage open-air construction or transparency.
	Policy 5.1-P-6: Ensure that streetscape design in the designated corridors is sensitive to views.
	Goal 5.3-G-2: Ensure that building height, massing, and tower spacing allows for greater visual penetration closer to the water.
	Policy 5.5-P-3: Preserve and create views by: <ul style="list-style-type: none"> • Requiring all buildings to comply with view corridor stepbacks along existing streets and future view corridors to maintain visual and physical access to the Bay. • Requiring buildings taller than 120 feet in the Waterfront/Marina District to be oriented so as to present the smaller face along the view corridors toward the water.
	Policy 6.10-P-9: Protect views available along Hawthorn, Grape, Fir, Date, and Beech streets from obstructions potentially caused by street trees and development projects.
	Policy 7.1-P-3: Forge new connections and view corridors as larger sites are redeveloped, opening rights-of-way at the waterfront, through the Civic Center among others, and along Cedar Street. Require full vehicle and pedestrian access in new connections except where precluded by existing plans and projects.

TABLE 1.3-3
Environmental Effects Considered Not Significant

<p>Agricultural Resources</p> <p>The downtown planning area does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designated by the California Department of Conservation. Furthermore, the area is not subject to, nor is near, a Williamson Act Contract pursuant to Section 51201 of the California Government Code. Therefore, no significant impacts to agricultural resources would occur with implementation of the proposed Downtown Community Plan.</p> <p>Biological Resources</p> <p>The downtown planning area is almost entirely lacking in native vegetation and its associated wildlife. No sensitive plant or animal resources have been identified within the downtown planning area due to its urbanized character. Thus, there would be no change to the diversity of species of plants and animals or reduction in the numbers of rare or unique plants or animals. Furthermore, the proposed Plan would include a number of measures to control offsite habitat impacts from urban runoff on San Diego Bay. Therefore, no significant impacts to biological resources would occur with implementation of the proposed Downtown Community Plan.</p>	<p>Mineral Resources</p> <p>The downtown planning area has been urbanized since the early part of the 20th Century. The potential for viable extraction of mineral resources is limited due to the urbanized character of the area. Furthermore, the area has not been designated as having a high potential for mineral resources. Therefore, no significant impacts to mineral resources would occur as a result of the proposed Downtown Community Plan.</p>
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TABLE 1.4-1
Qualitative Comparison of the Environmental Effects of No Project (1992 Plan)
Relative to the Proposed Community Plan

ENVIRONMENTAL ISSUE	PROPOSED COMMUNITY PLAN		NO PROJECT: 1992 PLAN	
	DIRECT	CUMULATIVE	DIRECT	CUMULATIVE
Air Quality (AQ)				
AQ-B.1 Construction Emissions	SM	SNM	SM (=)	SNM (=)
AQ-C.1 Mobile-source Emissions	NS	SNM	NS	SNM (-)
Cultural-Historical Resources (CULHIST)				
CULHIST -A.1 Impacts to Historical Resources	SNM	SNM	SNM (=)	SNM (=)
CULHIST -B.1 Impacts to Archaeological Resources	SNM	SNM	SNM (=)	SNM (=)
Land Use (LU)				
LU-B.1 Ballpark Noise	SM	NS	SM (=)	NS
LU-B.2 Traffic Noise	SNM	NS	SNM (=)	NS
LU-B.3 Aircraft Noise	SNM	NS	SNM (=)	NS
LU-B.4 Railroad Noise	SNM	NS	SNM (=)	NS
LU-B.5 Ballpark Lighting	SM	NS	SM (=)	NS
LU-B.6 Transient Impacts	SNM	SNM	SNM (=)	SNM(=)
Noise (NOI)				
NOI-A.1 Traffic Noise Level Increase on Grid Streets	SNM	SNM	SNM (-)	SNM (-)
NOI-B.1 Interior Traffic Noise	SM	NS	SM (=)	NS
NOI-B.2 Interior Ballpark Noise	SM	NS	SM (=)	NS
NOI-C.1 Exterior Traffic Noise in Residential Development	SNM	NS	SNM (-)	NS
NOI-C.2 Exterior Aircraft Noise in Residential Development	SNM	NS	SNM (=)	NS
NOI-D.1 Exterior Traffic Noise in Public Parks and Plazas	SNM	NS	SNM (=)	NS
NOI-D.2 Exterior Aircraft Noise in Public Parks and Plazas	SNM	NS	SNM (=)	NS
Paleontological Resources (PAL)				
PAL-A.1 Impacts to significant paleontological resources during construction	SM	NS	SM (=)	NS
Traffic and Circulation (TRF)				
TRF-A.1.1 Impact on grid streets	SNM	NS	SNM (-)	NS

TABLE 1.4-1 (Continued)
Qualitative Comparison of the Environmental Effects of No Project (1992 Plan)
Relative to the Proposed Community Plan

ENVIRONMENTAL ISSUE	PROPOSED COMMUNITY PLAN		NO PROJECT: 1992 PLAN	
	DIRECT	CUMULATIVE	DIRECT	CUMULATIVE
<u>TRF-A.1.2 Impact on surrounding streets</u>	<u>SNM</u>	<u>SNM</u>	<u>SNM (-)</u>	<u>SNM (-)</u>
TRF-A.2.1 Impact on freeway <u>ramps and segments</u>	SNM	NS SNM	SNM (-)	<u>SNM (-)</u> NS
TRF-A.2.2 Impact from Removal of Cedar Street Off-ramp	SNM	NS	SNM (-)	NS
TRF-D.1 Excessive Parking Demand	SNM	NS SNM	SNM (-)	<u>SNM (-)</u> NS
Visual Quality (VIS)				
VIS-B.1 Disruption of Views of San Diego Bay and San Diego-Coronado Bay Bridge from Balboa Park and Highway	SNM	NS	SNM (-)	NS
Water Quality (WQ)				
WQ-A Surface Water Pollution	NS	SNM	NS	SNM (=)

NS: Not Significant
 SM: Significant but mitigable
 SNM: Significant and not mitigable

(=) Impact essentially equivalent to proposed Community Plan
 (+) Impact greater than proposed Community Plan
 (-) Impact less than proposed Community Plan

CHAPTER 2.0

INTRODUCTION

This EIR is prepared by the Centre City Development Corporation (CCDC) acting on behalf of the City of San Diego's Redevelopment Agency (Redevelopment Agency), which is the designated Lead Agency, as defined Section 15050(a) of the CEQA Guidelines. CCDC has prepared this EIR to address the potential environmental effects of a series of planning documents that govern the development of downtown San Diego. The document is intended to be used by the Redevelopment Agency, as Lead Agency, and the City of San Diego, as a Responsible Agency, in approving the proposed Plans and Ordinance. In addition, as a Program EIR, the document is intended to be used by the Redevelopment Agency as well as other Responsible Agencies when taking action on subsequent permits to allow development in accordance with the proposed Plans and Ordinance.

2.1 THE PROPOSED PLANS AND ORDINANCE

A hierarchy of planning documents control development of the approximately 1,445 acres which comprise the downtown area. The primary documents include: the Redevelopment Plan for the Centre City Project Area, the Centre City Community Plan and three Planned District Ordinances (Marina, Gaslamp and Centre City) that implement the policies and guidelines contained in the Centre City Community Plan. The documents that are proposed to be revised under this EIR include the Centre City Community Plan, the Redevelopment Plan for the Centre City Project Area, and the Centre City Planned District Ordinance. For the purpose of this EIR, the revisions to these plans and ordinance are collectively referred to as the "proposed Plans and Ordinance." The revision to the Centre City Community Plan is referred to as the "proposed Downtown Community Plan," or "proposed Plan." A full list of the documents subject to proposed amendments is presented in Chapter 4.0 of this report.

2.1.1 DOWNTOWN COMMUNITY PLAN

The proposed Downtown Community Plan would replace the Centre City Community Plan, which was adopted in 1992. A Community Plan is part of the City of San Diego's Progress Guide and General Plan and provides an overall framework for development by defining land use types and building intensities, the transportation system, recreational opportunities and urban design. The primary objective of the Downtown Community Plan is to strengthen downtown's role as the regional urban center for the metropolitan area, consistent with the City's Strategic Framework Element of the General Plan.

2.1.2 REDEVELOPMENT PLAN

In order to reflect the changes contained in the Downtown Community Plan, the Redevelopment Plan for the Centre City Project Area would be amended for consistency. Some of the purposes of the Redevelopment Plan include the following: elimination of blighted conditions, including small and irregular lots, incompatible land uses, obsolete and/or dilapidated buildings, and sub-standard and deteriorated public improvements; rehabilitation of buildings and preservation of architecturally-significant historic sites and buildings; planning, redesign, and development of areas that are stagnant and underutilized; participation of owners and tenants in the revitalization of their properties; and, provision of low- and moderate-income housing. The primary revisions proposed result from replacing descriptions of land use districts to be consistent with the Downtown Community Plan, and to revise estimates of residential population and number of residential units in the Redevelopment Area.

2.1.3 PLANNED DISTRICT ORDINANCE

Similarly, the Centre City Planned District Ordinance (PDO) that applies within the Downtown Community Plan area would be revised. The Centre City PDO is the primary regulatory document that would implement the goals and policies identified in the Downtown Community Plan. PDO regulations with respect to land use, density and intensity, building massing, sun access, architectural design, landscaping, streetscaping, lighting, and other development characteristics would be modified to be consistent with the Downtown Community Plan. No changes are proposed to the Gaslamp and Marina Planned District Ordinances.

2.2 ENVIRONMENTAL PROCESS

Pursuant to the requirements of the CEQA of 1970 (California Public Resources Code, §21000 et. seq.) and the CEQA Guidelines, environmental review is required for any action that may result in a significant impact on the environment. In accordance with Section 15063 of the CEQA Guidelines, the CCDC conducted an Initial Study to determine the potential environmental consequences associated with approval and implementation of the proposed Plans and Ordinance. On the basis of this evaluation, it was determined that future development could result in significant environmental impacts and that an EIR must be prepared.

2.2.1 SCOPE OF THE EIR

The scope of the analysis for this EIR was determined by the Initial Study completed by CCDC, and comments received during a scoping meeting held on April 26, 2004 and in response to a Notice of Preparation (NOP) that was distributed on April 1, 2003. The NOP and the comment letters that were received are contained in Appendix 2.1.

Based on the Initial Study, responses to the NOP and comments made during the scoping meeting, it was determined that the proposed Plans and Ordinance might result in potentially significant adverse environmental impacts in the following areas:

- Air Quality;
- Cultural Resources;
- Energy;
- Geology & Seismicity
- Hazardous Materials;
- Hydrology/Water Quality;
- Land Use and Planning;
- Noise;
- Paleontological Resources;
- Population/Housing;
- Public Facilities and Services;
- Transportation, Circulation, Access, and Parking; and
- Aesthetics/Visual Quality.

The EIR addresses both “plan to ground” impacts as well as “plan to plan” impacts. The “plan to ground” analysis addresses the changes or impacts that will result from implementation of the proposed Plans and Ordinance as compared to the existing conditions (refer to Chapter 5.0 of the EIR). The “plan to plan” analysis addresses the changes or impacts that will result from implementation of the proposed Plans and Ordinance as compared to the currently adopted Plans. The “plan to plan” analysis is concentrated in the discussion of the No Project alternative that would retain the existing adopted Centre City Community Plan, Redevelopment Plan for the Centre City Project Area, and Centre City PDO (refer to Chapter 10.0 of the EIR).

2.2.2 PURPOSE OF THE EIR

This EIR has been prepared to achieve the following objectives:

- Inform decision-makers and the general public of the potential environmental consequences of the approval and implementation of the proposed Plans and Ordinance;
- Identify project alternatives or mitigation measures that are available to avoid or reduce potential significant environmental impacts;
- Serve as a basis for environmental review of all public and private activities or undertakings pursuant to the Redevelopment and Community plans and Planned District Ordinance, as updated and resulting from approval of the proposed Plans and Ordinance;
- Provide environmental review for other lead or responsible agencies with jurisdiction over future development falling within the scope of the proposed Plans and Ordinance as updated; and,
- Reduce the environmental review required as subsequent development occurs according to the goals, policies, and regulations of the proposed Plans and Ordinance.

In order to meet the first objective, the EIR forecasts the growth of downtown pursuant to the various policies and regulations that are proposed as part of the proposed Plans and Ordinance. This growth is assumed to include implementation of the policies and regulations included in the proposed Downtown Community Plan, Redevelopment Plan for the Centre City Project Area and Centre City PDO. Based on this foundation, the EIR identifies physical changes in the environment that may result from development in accordance with these policies and regulations (refer to Chapter 5.0). In addition, the EIR identifies mitigation measures that are available to avoid or minimize effects that could result in significant environmental impacts. These mitigation measures are identified in Chapter 5.0 of the EIR as well as the Mitigation Monitoring and Reporting Plan (MMRP), which will accompany the Final EIR. These measures include measures that are to be carried out as part of specific future developments.

Environmental review for specific development projects will be accomplished using the Secondary Study process defined in the Redevelopment Agency's own CEQA Guidelines, as allowed by Sections 15168 and 15180. The Secondary Study includes the same evaluation criteria as the Initial Study defined in Section 15063 of the CEQA Guidelines. A Secondary Study would be prepared for each subsequent development to determine whether the potential impacts were anticipated in this EIR. No additional environmental documentation would be required for subsequent projects if the Secondary Study determines that the potential environmental effects have been adequately addressed in the EIR and/or individual developments would implement appropriate mitigation measures identified in the MMRP accompanying the EIR.

The Secondary Study review will include an analysis of the relationship of the development under consideration to the relevant goals and policies of the Community Plan which are summarized in Table 1.3-2. As discussed throughout Chapter 5.0 of the EIR, implementation of these goals and policies would reduce environmental impacts associated with future development.

If the Secondary Study identifies new impacts or a substantial change in circumstances, additional environmental documentation would be required. The form of this documentation would depend upon the nature of the impacts of the development proposal being considered. Should a development result in new or substantially more severe significant impacts that are not adequately covered in the EIR, or there is a substantial change in circumstances that would require major revision to the previous EIR, or new information comes to light which was not known at the time the previous EIR was certified, a Subsequent EIR or Supplement to the EIR would be prepared in accordance with Sections 15162 and 15163 of the CEQA Guidelines. If potential new significant impacts can be fully mitigated, a Mitigated Negative Declaration would be prepared. More detailed development-specific studies conducted as part of this subsequent environmental review would further quantify environmental impacts and generate project-specific mitigation measures to avoid or minimize significant environmental impacts of specific developments.

2.2.3 TYPE OF EIR

This document has been prepared as a Program EIR in accordance with Section 15168 (a)(3) of the State CEQA Guidelines. Under this section, a Program EIR "may be prepared on a series of actions that can be characterized as one large project and are related ...in connection with the issuance of rules, regulations, plans or other general criteria to govern the continuing program."

Preparation of a Program EIR is also appropriate in light of Section 15180 of the CEQA Guidelines related to Redevelopment Projects. Section 15180 states:

- (a) All public and private activities or undertakings pursuant to or in furtherance of a redevelopment plan constitute a single project, which shall be deemed approved at the time of adoption of the redevelopment plan by the legislative body. The EIR in connection with the redevelopment plan shall be submitted in accordance with Section 33352 of the Health and Safety Code.
- (b) An EIR on a redevelopment plan shall be treated as a program EIR with no subsequent EIRs required for individual components of the redevelopment plan unless a subsequent EIR or a supplement to an EIR would be required by Section 15162 or 15163.

2.2.4 ORGANIZATION OF THE EIR

The EIR is comprised of a series of volumes. Volume I is commonly referred to as the EIR because it contains all of the basic elements mandated by CEQA. As such, Volume I contains a complete description of the proposed Plans and Ordinance, a comprehensive discussion of impacts and mitigations associated with the proposed Plans and Ordinance and a discussion of alternatives and cumulative impacts. Volumes 2.0 through 4.0 contain all of the technical reports and other documents that are referenced in the EIR. Subsequent volumes will also contain the comments received in response to the EIR, and the responses to those comments.

2.2.4.1 Volume 1A (EIR)

This volume is organized into the following chapters:

- **Chapter 1.0 Executive Summary** provides a summary of the proposed Plans and Ordinance along with a table identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. This chapter also contains a summary of the project alternatives that have been considered and compares the potential impacts of the alternatives with those of the proposed Plans and Ordinance.
- **Chapter 2.0 Introduction** contains an overview of the proposed Plans and Ordinance and the environmental review process.
- **Chapter 3.0 Environmental Setting** contains a description of the physical environmental conditions in the vicinity of the project area from both a local and regional perspective. The environmental setting is intended, in part, to constitute the baseline physical conditions against which the EIR determines whether an impact is significant.
- **Chapter 4.0 Project Description** provides a detailed discussion of the proposed Plans and Ordinance. It also includes a list of discretionary actions that may be required to implement the proposed Plans and Ordinance including subsequent development proposals.
- **Chapter 5.0 Environmental Analysis** provides a detailed evaluation of specific issue areas that may be associated with significant environmental impacts. The discussion of each issue begins with a discussion of the existing conditions related to the issue to serve as a basis of analysis. An evaluation of potential impacts follows. The discussion of impacts is preceded by a statement of specific thresholds that are used to determine if the impacts would be significant. In order to clearly identify significant impacts, each significant impact is introduced with bold type and paraphrased in a box that is imbedded into the text. Each significant issue is given a unique alpha-numeric number. Once the impacts have been evaluated, specific mitigation measures are identified to avoid or reduce significant impacts. The mitigation measures use the same numbering system as the impact to help the reader associate the mitigation with the appropriate impact.
- **Chapter 6.0 Cumulative Impacts** identifies the impact of the proposed Plans and Ordinance in combination with other planned and future development in the region.

- **Chapter 7.0 Growth Inducement** evaluates the potential influence the proposed Plans and Ordinance may have on growth within the project area as well as the region.
- **Chapter 8.0 Effects Found Not To Be Significant** lists all of the issues determined in the Initial Study to be not significant, including a brief summary of the basis for this determination.
- **Chapter 9.0 Significant Irreversible Environmental Changes** identifies all of the significant impacts related to the proposed Plans and Ordinance that cannot be avoided.
- **Chapter 10.0 Alternatives** provides a description of alternatives to the proposed Plans and Ordinance. Due to the nature of the project and the environmental issues, the discussion of alternatives is focused on the No Project alternative that evaluates the environmental consequences of developing downtown in accordance with the existing Centre City Community Plan and related planning controls. Other approaches to the land use plan considered during the formulation of the proposed Plans and Ordinance are discussed as alternatives considered but rejected.
- **Chapter 11.0 References** lists all of the documents which are cited in the EIR but not included in the appendix volumes.
- **Chapter 12.0 Individuals and Organizations Consulted** lists all of the individuals who are cited in the EIR.
- **Chapter 13.0 Certifications** identifies all of the persons who were directly involved in the preparation of the EIR.

2.2.4.2 Volume 1B (EIR)

Volume 1B includes the Responses to Comments, Mitigation, Monitoring and Reporting Plan and Findings and Statement of Overriding Considerations which are part of the Final EIR.

2.2.4.23 Volume 2 (Technical Reports)

Volume 2 contains all of the technical reports which were prepared in association with the EIR. These reports are referenced throughout the EIR.

2.2.4.34 Volume 3 (Traffic Model Output)

Due to their size and technical nature, the traffic model output associated with the Traffic Report (Appendix 2.3) are included in a separate volume which is available to technical specialists who may desire to review the computer printouts upon which the traffic analysis is based.

2.3 EIR REVIEW PROCESS

The EIR process occurs in two basic stages. The first stage is the Draft EIR, which offers the public the opportunity to comment on the document, while the second stage is the Final EIR, which provides the basis for approving the proposed Plans and Ordinance.

2.3.1 DRAFT EIR

This Draft EIR ~~will be~~was circulated for a 45-day public review period from July 28, 2005 through September 12, 2005. In accordance with 15087 (a) (1) of the CEQA Guidelines, a Notice of Availability ~~will be~~was placed in a newspaper of general circulation in the area (The *San Diego Daily Transcript*). Copies of the EIR ~~will be~~were distributed to responsible agencies as well as certain special districts, citizens and interest groups. Copies of the Draft EIR ~~will be~~were available for review and comment at CCDC's office located at 225 Broadway, Suite 1100, San Diego, CA, as well as the downtown library located at 820 E Street. An electronic copy of the EIR ~~is~~was available for review and/or downloading on CCDC's web site at www.ccdc.com. Compact disks (CD) containing the EIR ~~are~~were available upon request from CCDC. A hardcopy of the document ~~is~~was also available for the cost of reproduction. Requests ~~should be~~were made to Alexandra Elias at 619.235.2200.

The public review ~~is intended to~~focused "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (Section 15204, CEQA Guidelines)." Comments on the adequacy of the EIR ~~wereshould be put in writing and~~ sent to the following address within the allotted 45-day public review period.

Alexandra Elias, Senior Planner
CENTRE CITY DEVELOPMENT CORPORATION
225 Broadway, Suite 1100
San Diego, CA 92101

Comments ~~were~~must be received or postmarked by the last date of the public review period.

2.3.2 FINAL EIR

The Final EIR process includes preparation of the following: detailed responses to comments received during the public review period, an MMRP, and Findings and Statements of Overriding Considerations. The culmination of this process is the public hearing where the City Council and Redevelopment Agency will determine whether to certify the Final EIR as being complete in accordance with CEQA.

Volume 1A includes modifications to the Draft EIR which result from one three primary sources. Many of the changes are in response to comments received on the EIR during the public review period. Others resulted from testimony at past public hearings subsequent to the end of public review. Lastly, other text and graphic changes, unrelated to public comment or testimony, were

made to clarify the EIR or to reflect changes in the Proposed Community Plan that occurred after public review. Text modifications are indicated in strikeout/underline format.

A brief summary of these modifications is provided below.

Changes in Response to Evolution of Proposed Plans or Ordinance

- Original PDO section number references were eliminated to avoid confusion since the section numbers will be changed (various pages);
- At the request of the Airport Authority, the project description includes a proposal to amend the City's Land Development Code to remove building height limitations imposed by a runway that no longer exists as well as noting the fact that this would not change the EIR conclusions as the land use forecasts assumed these building height limitations would not apply (page 4-42 and 43); and
- Changing the title of the Flexible Use designation to Mixed Commercial (various pages).

Changes in Response to Public Comment

- Information on police staffing was updated (page 5.4-4 and 5).

Changes in Response to Development Services Department

- Discussion explaining why there would be no significant land use conflicts between industrial and residential development (page 5.1-21);
- Cultural and paleontology mitigation measures replaced with standard City language (pages 5.3-23-31 and 5.12-2-7);
- Preliminary discussion of environmental considerations associated with potential fire station site in East Village was eliminated to avoid giving the impression that no further environmental review would be required to construct a fire station at this location (page 5.4-4 and 13);
- The land uses subject to 45 dBA CNEL requirements was more specifically defined to include residential, hospital and hotels and CNEL was added as the unit of measure for interior noise levels (pages 5.7-7 and 16);
- Mitigation Measure NOI D.1-1 was clarified with respect to the fact that outdoor recreation areas would not be reduced to 65 dBA CNEL if it interfered with the recreation activities (page 5.7-17);
- Expansion of the water supply discussion to reference the role of Water Supply Assessments at the project level pursuant to SB 610 as allowing water supply to be addressed throughout buildout (pages 5.4-7, 8, 13 and 14);
- Additional text added to explain why only the No Project alternative was considered (page 10.1 and 2); and
- Discussion of other land use scenarios considered by the steering committee were eliminated because they do not represent alternatives as defined by CEQA (pages 10.11-13).

Changes in Response to Planning Commission

- New traffic mitigation was added to require projects generating more than 2,400 ADT to prepare individual traffic studies pursuant to the City's Traffic Impact Manual (page 5.2-50); and
- New traffic mitigation measure was added to commit CCDC to initiate efforts with Caltrans and SANDAG to find long-term solutions for anticipated traffic congestion on the freeway system serving downtown (page 5.2-52).

Volume 1B includes Responses to Comments, Mitigation, Monitoring and Reporting Plan, and Findings and Statement of Overriding Considerations.

Responses to comments received during the public review period are contained in Volume 1B.1 of the Final EIR. Individual comments within each letter ~~that is received will have been~~ numbered and a specific written response ~~will be~~ offered for each individual comment. The responses will be available for review no less than 14 calendar days prior to the public hearing to consider EIR certification.

An MMRP, prepared in accordance with Section 15097 of the CEQA Guidelines, ~~will be~~ included in Volume 1B.2 of ~~in~~ the Final EIR. This document ~~will include~~ a summary of significant impacts identified in the EIR along with any proposed mitigation measures which are identified to avoid or reduce the impact.

Detailed Findings of Fact ~~will be~~ contained in Volume 1B.3 of attached to the Final EIR. Pursuant to Section 15091 of the CEQA Guidelines, the Findings ~~will identify~~ each significant impact addressed in the EIR and make a specific conclusion for each impact as to whether the impact can be reduced to a below a level of significance after implementation of mitigation. As some of the ~~Should any~~ environmental impacts ~~have been~~ determined not to be reduced to below a level of significance, a Statement of Overriding Considerations ~~would be~~ is included in Volume 1B.3 ~~be prepared~~ to identify the social, economic, technical or other factors taken into consideration by the City Council and/or Redevelopment Agency in deciding whether to approve the proposed Plans and Ordinance despite unmitigated significant impacts.

2.3.3 SUBSEQUENT ENVIRONMENTAL REVIEW

As described above, future development proposed pursuant to the proposed Plans and Ordinance would be reviewed in light of the Final EIR. As each new development is proposed, a Secondary Study would be prepared to determine if the EIR adequately addressed the potential environmental impacts of the proposed development (CEQA Guidelines Sections 15168 and 15180). For a complete discussion of the Secondary Study process and subsequent environmental review, refer to Section 2.2.2.

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CHAPTER 3.0

ENVIRONMENTAL SETTING

3.1 LOCATION

The Downtown Community Plan area (“downtown planning area”) encompasses the downtown San Diego area located 30 miles north of the United States International Border with Mexico and 120 miles south of Los Angeles (Figure 3.1-1). More specifically, downtown includes approximately 1,445 acres of land in the metropolitan core of the City of San Diego, located in the southern half of San Diego County. Surrounding areas include the community of Uptown and Balboa Park to the north, Golden Hill and Sherman Heights to the east, Barrio Logan and Logan Heights to the south, and the City of Coronado to the west across San Diego Bay.

The downtown planning area is bounded by Laurel Street and Interstate 5 on the north; Interstate 5, Commercial Street, 16th Street, Sigsbee Street, Newton Avenue, Harbor Drive, and the extension of Beardsley Street on the east; and San Diego Bay on the south and west (Figure 3.1-2). Major north-south access routes to downtown are Interstate 5, State Route 163, and Pacific Highway. The major east-west access route to downtown is State Route 94.

As shown in Figure 3.1-2, the proposed Downtown Community Plan shares the same boundaries with the Redevelopment Plan for the Centre City Project Area. The Horton Plaza Redevelopment Project is also located downtown, but has much smaller project boundaries and is completely surrounded by the proposed Downtown Community Plan and Centre City Redevelopment Plan areas. The Horton Plaza Redevelopment Project area is bound by Broadway, Union Street, Fourth Avenue, and G Street. Various parcels along B Street between Fourth and Eighth Avenues are characterized as “excluded” from the provisions of redevelopment law.

3.2 PHYSICAL CHARACTERISTICS

Downtown is characterized by a relatively high intensity and variety of urban land uses, such as high-rise commercial office, multi-family residential, retail, hotel, entertainment, and institutional/government uses. Downtown’s residential growth is currently very strong, as evidenced by the fact that the downtown population has grown from 2,000 to over 20,000 since redevelopment began in 1975. Over 20% of this growth has occurred in the last five years (CCDC, Working Paper #6, page 2-2). The growing residential market is anchored by downtown amenities including the government and business offices in the Core and Little Italy and visitor attractions such as Seaport Village, the Convention Center, the historic Gaslamp District, Petco Park, and Horton Plaza. The business economy downtown has also experienced significant growth. Downtown contains over

thirteen million square feet of civic and private office space and an estimated employment population of 74,500 (CCDC, Downtown Community Plan, 2005).

As one of the oldest communities in San Diego, downtown contains architecturally unique and historically significant structures, a number of which have been preserved, restored, or incorporated into new development. Downtown is located on the waterfront of San Diego Bay and is in proximity to Balboa Park, affording the downtown area with access to regional open space. There are also opportunities to experience culture and the arts at various theaters, music halls, galleries, Copley Symphony Hall, and the Civic Theatre.

Downtown's street network creates a grid pattern that results in relatively small (200 feet x 300 feet or 1.4 acre) blocks. A number of streets are one-way, and others limit left-hand turns against opposing traffic. These features combine to allow flexibility of choices to drivers and pedestrians, resulting in smoother traffic flow. Downtown is connected to three major freeways, including Interstate 5 (I-5), State Route 163 (SR-163), and State Route 94 (SR-94). Pacific Highway is also currently used to carry a moderate concentration of traffic flow in and out of downtown.

Transit consists of heavy rail lines along the western edge of downtown, adjacent to Pacific Highway, serving commuters, regional travelers, and to the south, freight from working areas of the Port. Two trolley lines serve downtown residents, workers, and visitors and an extensive network of public buses connects the area to the rest of San Diego. A multitude of bus routes serves downtown on almost a 24-hour basis, and transit is more prevalent downtown than in any other part of the region.

3.2.1 CLIMATE

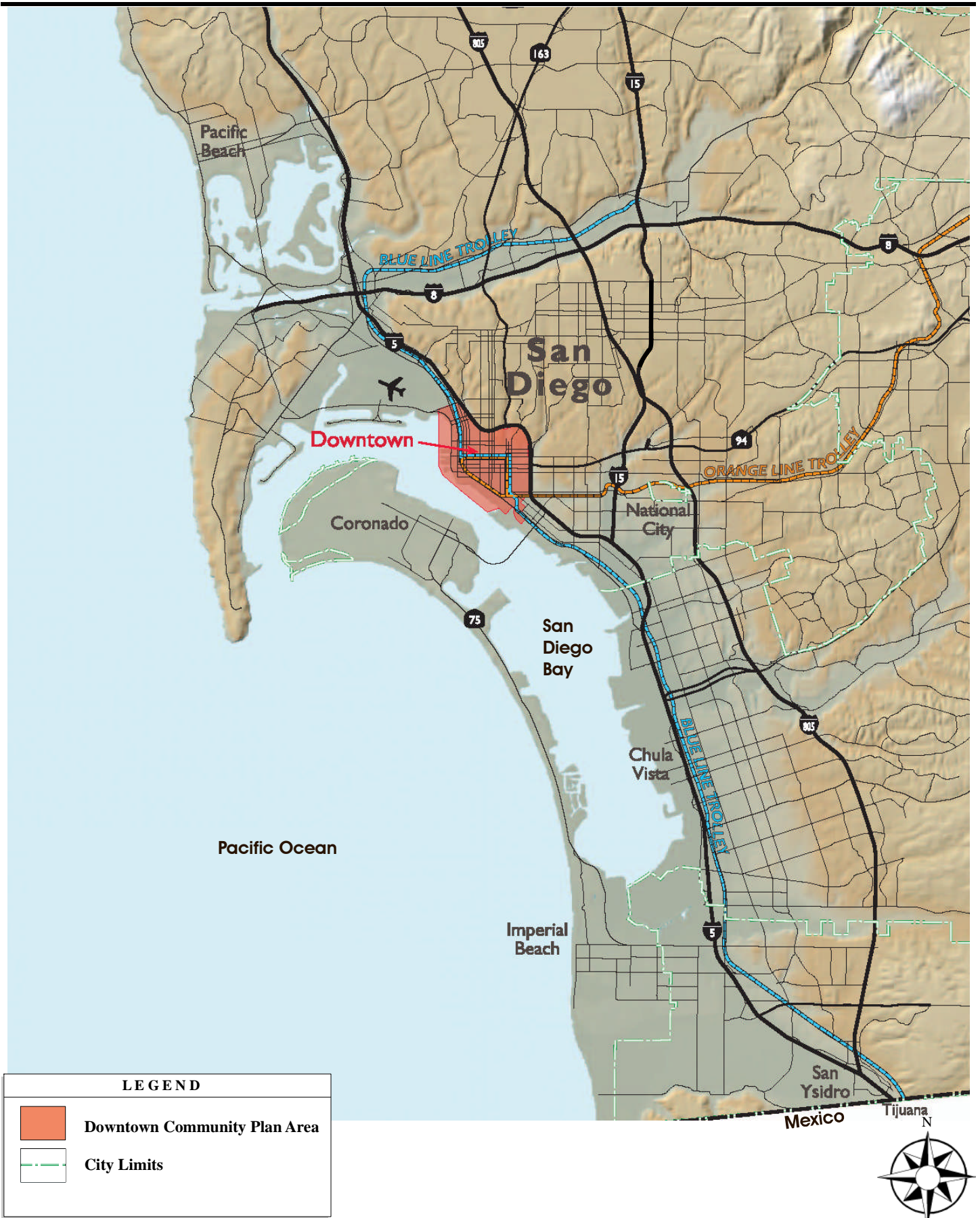
Downtown's climate significantly contributes to the overall quality of life in the area. The climate is identified as Mediterranean, which is characterized by dry, warm summers and mild winters. An average of ten inches of rain falls each year from November to early April, while the remainder of the year is typically dry. Measurable rain falls on 20 days per year, with only six days of moderate (0.5 inches in 24-hours) rainfall per year.

3.2.2 LANDSCAPE

Downtown's general landscape is characterized by urban features such as buildings, streets and sidewalks. Vegetation is comprised of ornamental trees and plantings along streets and parkways, occasional lawns and gardens, and weeds covering vacant lots. Downtown is almost entirely lacking in native vegetation.

3.2.3 TOPOGRAPHY

As shown in Figure 3.2-1, downtown's topography is relatively flat, with elevations that range from sea level to a maximum of 180 feet above mean sea level. Near San Diego Bay, the western and southwestern areas of downtown have the lowest elevations. Elevations gradually rise to the northeast, with the highest elevation near Balboa Park in the downtown neighborhood of Cortez Hill.



Source: Community Plan, 2005

Regional Location Map

Figure 3.1-1

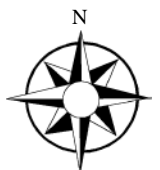
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LEGEND



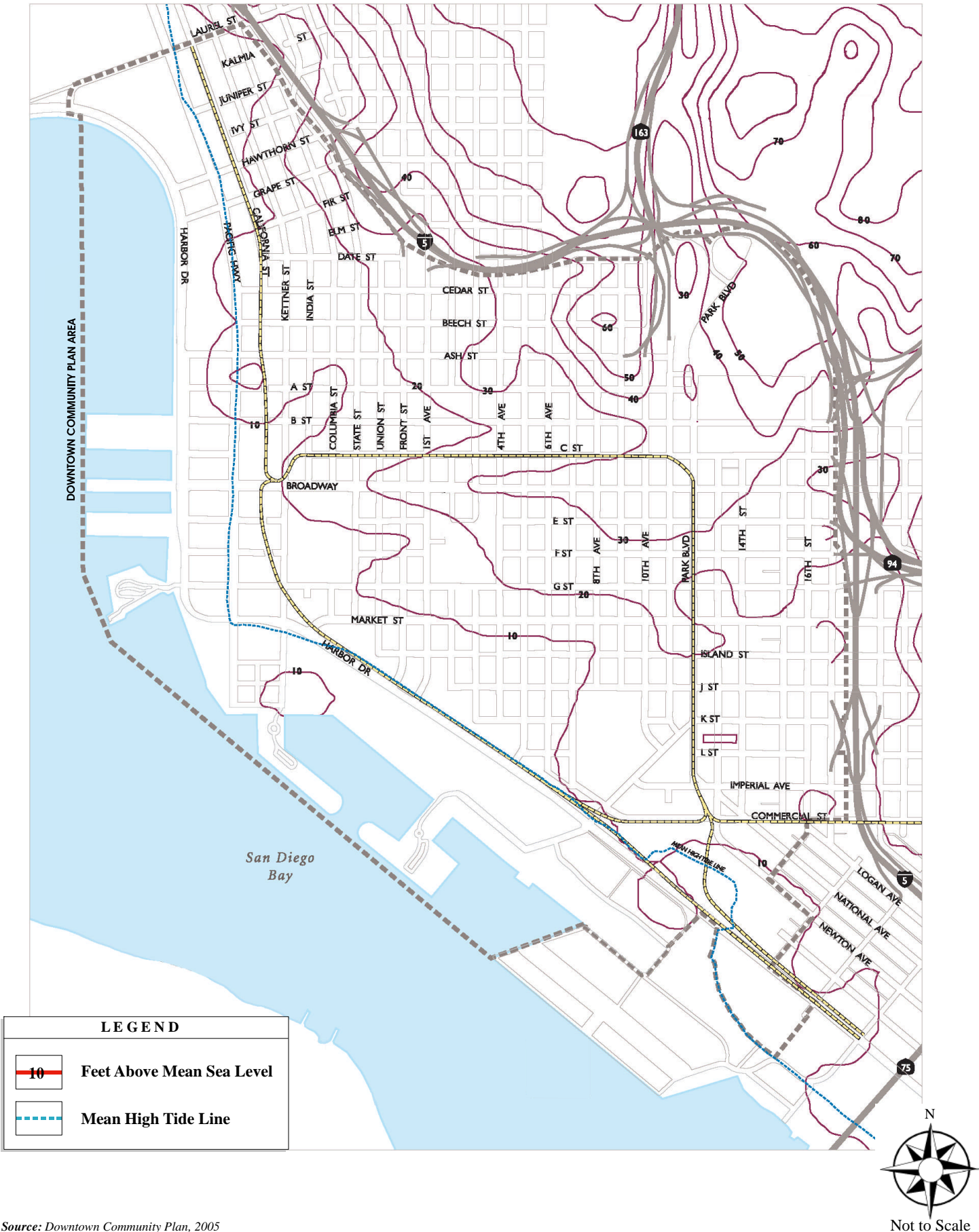
Downtown Community Plan Area



Not to Scale

Source: Downtown Community Plan, 6/2005, Air Photo USA, 1/2005

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Source: Downtown Community Plan, 2005

Downtown Topography

Figure 3.2-1

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3.3 APPLICABLE GENERAL PLANS AND REGIONAL PLANS

3.3.1. GENERAL PLANS

3.3.1.1 City of San Diego Progress Guide and General Plan

The City of San Diego Progress Guide and General Plan (General Plan) is a comprehensive long-term plan for the physical development of the City of San Diego. The General Plan considers downtown as an urbanized area that is the focus of metropolitan San Diego. Specifically, the General Plan's Strategic Framework Element encourages the further intensification of downtown to increase its role as a Regional Center. This would be accomplished by maintaining and enhancing its role as the pre-eminent business center in the region and developing as a major urban residential center with the largest concentration of high density multifamily housing in the region. The objectives for downtown include attracting intensive and varied land use, and strengthening the viability of downtown through renewal, redevelopment, and new construction.

As discussed in Chapter 5.1, development in accordance with the proposed Downtown Community Plan would be consistent with the City's General Plan and, specifically, its Strategic Framework Element. Understood as the primary urban area within the City of San Diego, the proposed Plans and Ordinance seek to promote the type of uses that would be encouraged under the General Plan.

3.3.1.2 San Diego Port Master Plan

Development along the waterfront is guided by the Port Master Plan. The Port Master Plan divides tidelands around San Diego Bay into ten Planning Districts. Each Planning District has a corresponding Precise Plan. The downtown tidelands are included in Planning District 3, named Centre City Embarcadero. The Precise Plan for Planning District 3 in the Port Master Plan allows for the development of commercial fishing and recreation uses; aviation and marine-related industrial uses; parks, plazas, promenades, and open space; public facilities; and commercial uses.

3.3.2 REGIONAL PLANS

3.3.2.1 Regional Comprehensive Plan

SANDAG's Regional Comprehensive Plan (RCP) is a long-range planning document that encourages local jurisdictions to address the San Diego region's housing, economic, transportation, environmental and overall quality of life needs. The RCP establishes a planning framework and implementation actions that aim to increase the region's sustainability and encourage "smart growth" (development that promotes alternative transportation use and minimizes environmental impacts).

To encourage regional sustainability and smart growth, the RCP aims to reduce the number of housing units and residents that are expected to be "exported" from the region by 2030. To achieve this, the Plan identifies certain areas in the region as Smart Growth Opportunity Areas. Designation of these opportunity areas is intended to provide guidance to local governments, property owners,

and service providers as to where smart growth development should occur from a regional perspective, and encourages local jurisdictions to focus attention on these areas as they update their general plans and redevelopment plans. Once these areas are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure to these areas will be prioritized. The intended effect of this effort is to attract housing units that are anticipated to be exported from the San Diego region to Baja California, Riverside County, Orange County and Imperial County by 2030. The RCP would redirect those housing units to areas within the region that are located along the existing and proposed regional transportation corridors as well as other locations where compact development is appropriate. A portion of this redirected development will occur in areas of vacant land and a portion will occur as redevelopment and infill development in existing communities.

As discussed in Chapter 5.1, the proposed Plans and Ordinance would be consistent with the goals of the Regional Comprehensive Plan. The Downtown Community Plan's neighborhood concept would result in pedestrian-oriented and -scaled neighborhoods, each focused on a mixed-use center and a park. The mixed-use center would be located within a relatively short walking distance of employment and housing, with a goal of making neighborhood amenities accessible without the use of a car. In addition, smart growth would be achieved with the proposed increase in intensity of uses. Downtown would maximize its infill development potential by encouraging multi-story residential, office, and mixed uses in appropriate areas, in anticipation of local transit improvements.

3.3.2.2 Regional Transportation Plan

SANDAG's Regional Transportation Plan, also known as MOBILITY 2030, serves as a blueprint to address the transportation and transit challenges created by the region's growing population and employment. It contains an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system in the San Diego region. The SANDAG Board of Directors approved the 2030 Regional Transportation Plan on March 28, 2003.

As discussed in Chapter 5.2, traffic generated by future development in accordance with the proposed Plans and Ordinance.

3.3.2.3 California State Implementation Plan (SIP)

The State Implementation Plan (SIP) was adopted by the California Air Resources Board (ARB) and Environmental Protection Agency (EPA) to bring non-attainment air basins into compliance with the National Ambient Air Quality Standards (NAAQS). Due to continued violations of NAAQS standards in the San Diego Air Basin (SDAB), the San Diego Air Pollution Control District (APCD), in conjunction with SANDAG, prepared a Regional Air Quality Strategy (RAQS) for its portion of the SIP.

The proposed Downtown Community Plan would be consistent with the California SIP. The assumptions of the SIP are based on growth trends anticipated by regional land use plans, including the Centre City Community Plan. The proposed Downtown Community Plan proposes increases in residential and employment populations above that anticipated by the Centre City Community Plan. However, the regional growth assumed by the SIP would not be substantially different, as anticipated growth would be concentrated to the downtown area providing relief from growth

pressures in other parts of metropolitan San Diego and the county. The downtown planning area would complement the goals of the RAQS by offering a variety of transit opportunities and by providing employment and neighborhood amenities within walking distance of residential areas. Therefore, there would be no conflict with the RAQS.

3.3.2.4 San Diego Regional Water Quality Control Board Basin Plan

The San Diego Regional Water Quality Control Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Downtown San Diego is located in the Pueblo San Diego Hydrologic Unit of the Basin Plan, a 60 square mile-area with no major stream system. The Pueblo San Diego Hydrologic Unit primarily drains into San Diego Bay. Groundwater in downtown is not designated as having current or potential beneficial use in the San Diego Basin Plan and further is noted as being exempt from municipal use designation.

The Municipal Storm Water National Pollutant Discharge Elimination System (NPDES) Permit, issued on February 21, 2001 to the City of San Diego, and other jurisdictions by the Regional Water Quality Control Board, requires that private and public development projects include storm water best management practices to reduce pollutants discharged from the project site to the maximum extent practicable.

As discussed in Chapter 5.9, future development downtown would not interfere with the water quality goals of the Basin Plan for the basin which includes downtown. No major natural water courses exist downtown and no uses of groundwater occur within the area. Water quality of San Diego Bay would be protected by short and long-term water quality control measures required by City and State regulations. Thus, the proposed Downtown Community Plan would be consistent with the Basin Plan.

3.3.2.5 City of San Diego Multiple Species Conservation Program

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation program that addresses multiple species habitats and preserves native vegetation communities within a 900-square-mile (582,243 acres) area in southwestern San Diego County. The MSCP area includes 11 city jurisdictions, portions of the unincorporated County of San Diego, and several special districts. The MSCP is intended to allow local jurisdictions, including the City of San Diego, to maintain land use control and development flexibility by planning a regional preserve system that can meet future public and private project mitigation needs.

As discussed in Chapter 8.0, no natural terrestrial vegetation or wildlife exist within the downtown area. Therefore, future development in accordance with the proposed Downtown Community Plan would be consistent with the MSCP.

3.3.2.6 San Diego International Airport Comprehensive Land Use Plan

The Regional Airport Authority's Comprehensive Land Use Plan (CLUP) for the San Diego International Airport (SDIA) is intended to ensure compatible land use development on and surrounding the airport. The CLUP describes the Airport Influence Area (AIA), which is determined by aircraft-generated noise. Within the AIA, all future land uses are reviewed for CLUP consistency. This process can result in limitations to building construction and use designations. The CLUP also identifies runway protection zones, the Airport Approach Overlay Zone, and aviation easements and noise attenuation efforts intended to correct the incompatibility of some land uses.

The proposed Downtown Community Plan would be consistent with the CLUP for the SDIA. It recognizes the risks of injury, life loss, and property damage associated with an airport in close proximity to the downtown planning area. The Downtown Community Plan includes goals and policies in terms of building height, use, and noise sensitivity in a manner consistent with the CLUP.

CHAPTER 4.0

PROJECT DESCRIPTION

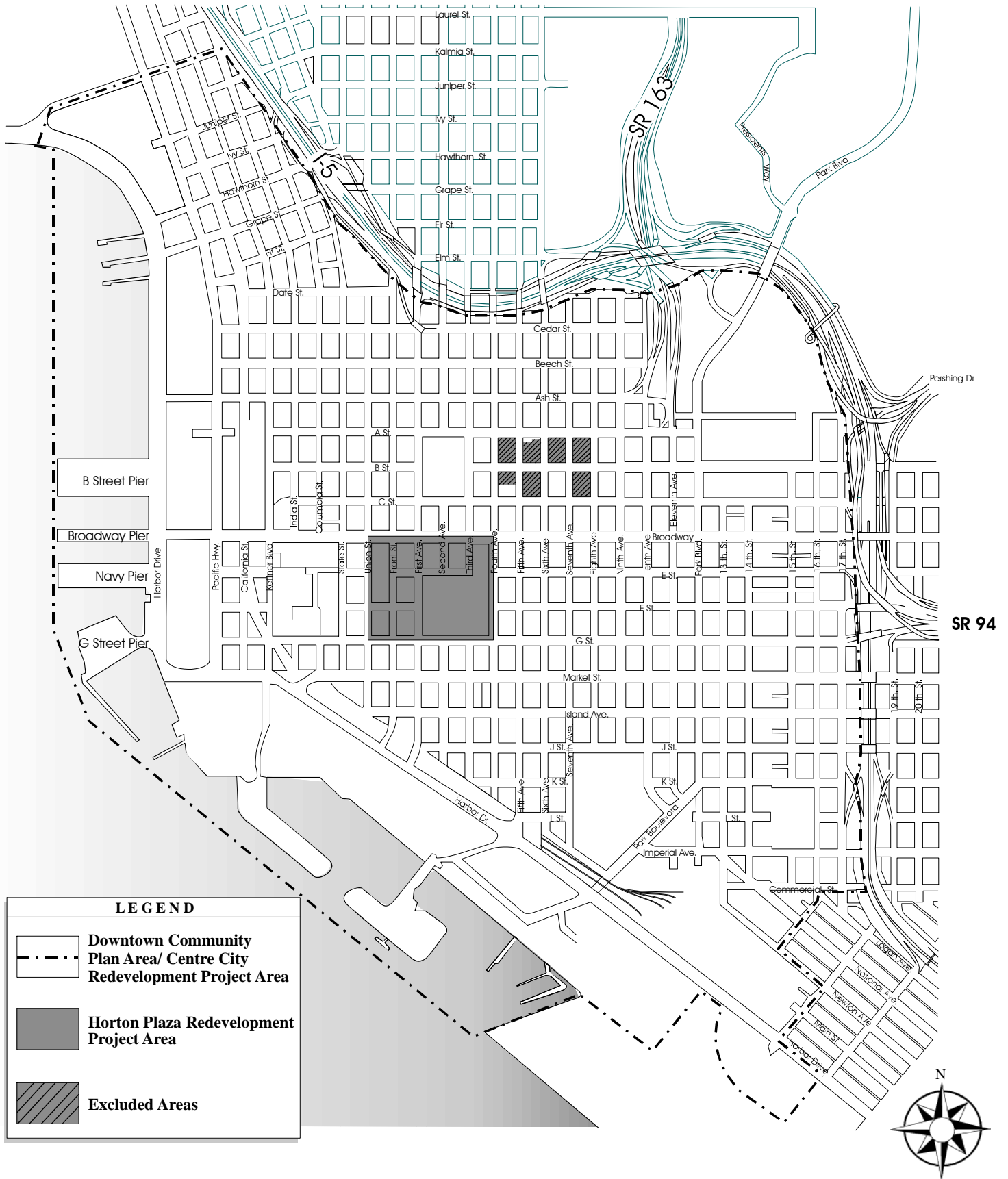
4.1 BACKGROUND

4.1.1 HISTORY OF THE REDEVELOPMENT PLAN AND COMMUNITY PLAN

California Community Redevelopment Law (California Health and Safety Code § 33000 et seq.) was adopted in 1962 to provide California cities and counties with the authority, scope and financial means to stimulate revitalization and eliminate blighted conditions in urban areas. The law outlines procedures to eliminate blight. It also defines the financial tools, legal authority and citizen participation necessary to successfully implement adopted plans.

In 1972, the City of San Diego established an area around and including Horton Plaza as downtown's first redevelopment project area. The Horton Plaza shopping center was the first redevelopment project, completed downtown in 1985. Subsequent to the adoption of the Redevelopment Plan for the Horton Plaza Redevelopment Project ("Horton Plaza Redevelopment Plan"), other areas in downtown were also targeted for revitalization. The Marina and Columbia Redevelopment Projects were each adopted in 1976, and the Gaslamp Quarter Redevelopment Project was adopted in 1982. Separate Redevelopment Plans were adopted along with the individual Project Areas.

The four redevelopment projects focused development and rehabilitation efforts within their boundaries until 1992, when it was determined that they alone were not sufficient catalysts to reverse the blight existing outside their project boundaries. In fact, the conditions of blight within downtown, but outside the redevelopment project areas, had worsened. In 1992, the Columbia, Marina, and Gaslamp Quarter project areas were merged to become the Centre City project area, with the adoption of the corresponding "Redevelopment Plan for the Centre City Redevelopment Project-area". In addition, the project boundaries were extended to include East Village (then known as Centre City East), Little Italy (then known as Harborview), and Cortez Hill. The Horton Plaza Redevelopment Project and the Centre City Redevelopment Project Areas now encompass the entirety of downtown as shown in Figure 4.1-1.



Source: Centre City Community Plan, 3/2002

Redevelopment Project Areas Figure 4.1-1

The Centre City Community Plan was adopted concurrently with the 1992 Centre City Redevelopment Plan. The Centre City Community Plan is one component of the City of San Diego's General Plan and Progress Guide, the "umbrella" planning document that directs future growth and development throughout the entire city. The Centre City Community Plan applies specifically to downtown and functions as the source of the vision for downtown redevelopment, describing in planning terms what downtown should look like. The Centre City Community Plan outlines the objectives related to future development downtown, and defines planning policies for land use; housing; circulation; urban design; open space; human, social and educational services; culture, arts and entertainment; historic preservation/conservation; special projects; and facilities financing.

Downtown's two redevelopment plans enable certain goals and policies of the Centre City Community Plan to be implemented through the use of redevelopment powers, such as tax-increment financing and selective use of eminent domain. In addition, the three PDOs serve as the zoning documents for the two redevelopment areas. The Centre City PDO applies to all of the area with the exception of the Gaslamp and the Marina Districts which have their own PDOs. The PDOs contain enforceable regulations and controls that implement the Centre City Community Plan and redevelopment plans.

4.1.2 CCDC'S HISTORY AND ROLE IN REDEVELOPMENT

California Community Redevelopment Law (California Health and Safety Code §33000 et seq.) allows for the establishment of local redevelopment agencies, giving them the authority to create project areas, issue tax allocation bonds, and acquire property through eminent domain when necessary to meet adopted redevelopment objectives. The elected members of the San Diego City Council serve as the San Diego Redevelopment Agency.

CCDC is the non-profit agency charged with implementing redevelopment projects in downtown on behalf of the Redevelopment Agency. Formed in 1975, CCDC is charged with forming public-private partnerships to facilitate redevelopment projects adopted pursuant to redevelopment law. Through an operating agreement, CCDC is the Agency's representative in the development of retail, residential, office, hotel, cultural and educational projects, and public improvement projects, and has the authority to approve development activities. The Mayor and City Council appoint each member of CCDC's board of directors to three-year terms.

4.1.3 THE PLANNING PROCESS

The proposed Downtown Community Plan is the product of a three-year public participation program combined with research and planning performed by a team of consultants under contract to CCDC. Central to the process was a 35-member Steering Committee that guided the formulation of planning and design principles. The Steering Committee's charge to consider input from the broader public was accomplished by a series of public workshops and a number of regular public meetings where downtown residents, employees, property owners, as well as representatives of advocacy groups and the surrounding neighborhoods, weighed in on issues and recommendations.

Key baseline information for downtown was developed for CCDC by a variety of consultants to assist in developing new land use strategies for downtown including geologic hazards, hazardous materials, historic resources, airport noise and crash hazard contours, and transit usage. This information was incorporated into a series of seven working papers, which were instrumental in developing the proposed Plans and Ordinance. The working papers include:

- Working Paper #1 – Report on Stakeholder Interviews;
- Working Paper #2 – Report on Public Workshops Planning Issues and Vision;
- Working Paper #3 – Draft Planning Principles;
- Working Paper #4 – Demographic and Market Assessment;
- Working Paper #5 – San Diego Downtown Comparison;
- Working Paper #6 – Downtown Opportunities and Challenges; and,
- Working Paper #7 – Alternatives.

All seven working papers are available at CCDC, and online at www.ccdc.com/planupdate/workingdocs.html. The working papers, along with the recommendations and input by the public and Steering Committee, contributed to the development of the proposed Plans and Ordinance.

4.2 OVERVIEW OF PROPOSED PLAN

The proposed Plans and Ordinance involves a comprehensive revision of the following primary planning documents governing downtown: the Downtown Community Plan (formerly Centre City Community Plan), the Redevelopment Plan for the Centre City Project Area, and the Centre City Planned District Ordinance. Subsequent amendments to other implementing plans and policies may be required for consistency.

4.3 PURPOSE/OBJECTIVES OF THE PROPOSED DOWNTOWN COMMUNITY PLAN

The purpose of the proposed Downtown Community Plan is to respond to downtown's current planning context and development trends, implement the San Diego General Plan's Strategic Framework Element, address underdeveloped and underutilized areas of downtown, and identify new opportunities that have arisen over the past decade.

As described in Chapter One of the proposed Plan, the guiding principles include:

- **A distinctive world-class downtown, reflecting San Diego's unique setting.** San Diego has evolved into a desirable place to live, work shop, learn and play. The Community Plan builds upon downtown's magnificent waterfront setting and its location as a transportation hub, and promotes outdoor and creative lifestyles.

- **The center of the region.** Downtown is envisioned as the physical and symbolic heart of metropolitan San Diego. It will be the regional administrative, commercial, and cultural center. Downtown's urban form would be an integral aspect of San Diego's identity.
- **Intense yet always livable, with a substantial and diverse downtown population.** An intense downtown is central to not only fostering vibrancy but also to curtailing urban sprawl a key tenet of San Diego's City of Villages strategy- and minimizing growth pressures in mature neighborhoods. Increased residential population will contribute to downtown's vitality, improve economic success, and allow people to live close to work, transit, and culture.
- **A nucleus of economic activity.** The Plan bolsters downtown's position as the regional economic and employment center by ensuring availability of employment land and the development of regional destinations. The creation of jobs easily accessed via transit, bicycle, or on foot would also further regional mobility goals.
- **A collection of unique, diverse neighborhoods with a full complement of uses.** The organizing concept of the Downtown Community Plan is walkable neighborhoods with a mix of uses and easy access to open space, shops, services, amenities, and cultural attractions that create opportunities for urban living.
- **A celebration of San Diego's climate and waterfront location.** The Plan fosters vital public spaces and active street life. Building massing would be orchestrated to ensure that sunlight reaches parks and Neighborhood Centers. Open spaces would be located within easy walking distance for residents, and streets would be designed for pedestrian comfort, walking, and lingering.
- **A place connected to its context and to San Diego Bay.** The Plan seeks to connect downtown's neighborhoods to the waterfront with new streets and view corridors, re-establish Balboa Park's relationship to downtown, and integrate downtown with the surrounding neighborhoods. It would also foster better linkages within downtown.
- **A memorable, diverse, and complex place.** The need for a diverse downtown is reinforced by its relatively large size – about 1,500 acres. Neighborhoods with their own unique characters and scales, distinctive streetscapes, and a tapestry of places and experiences will ensure that downtown is memorable and explorable. All of downtown will be alive with arts and culture.

4.4 PROJECT LOCATION AND BOUNDARIES

The proposed project area encompasses approximately 1,445 acres of land in downtown San Diego. The project area is bounded by Laurel Street and I-5 on the north; I-5, Commercial Street, 16th Street, Sigsbee Street, Newton Avenue, Harbor Drive, and the extension of Beardsley Street on the east; and San Diego Bay on the south and west (refer to Figure 3.1-2).

As illustrated in Figure 4.4-1, the proposed Downtown Community Plan applies to all of downtown. However, CCDC has no primary regulatory authority over property along the waterfront.

In addition, the following County-, State-, Federal-, and Navy-owned sites may be exempt from CCDC planning regulations based on primacy or inter-governmental immunity.

- **Federal Government.** The Federal Government maintains jurisdiction over the Edward J. Schwartz Federal Building, located at Front Street and E Street, and adjacent land being used for the expansion of the Federal Courthouse. In addition, federal property downtown includes the Post Office and the Federal jail.
- **U.S. Navy.** The U.S. Navy maintains a significant presence on the downtown waterfront with the Navy Broadway Complex, located between Broadway, Market Street, Pacific Highway, and Harbor Drive, and an office building at 1220 Pacific Highway.
- **State of California.** The State of California currently occupies an office building and parking areas in the north-western section of the Core neighborhood between State, Front, Ash, and A streets. The State is currently planning the construction of a replacement building.
- **San Diego County Regional Airport Authority.** The Regional Airport Authority acts as the Airport Land Use Commission for the San Diego International Airport, affecting downtown land uses in areas within the Airport Influence Area.
- **County of San Diego.** The County of San Diego owns several downtown sites including the County Administration Center on Pacific Highway and the County Courthouse and Jail on Broadway between First Avenue and State Street, among others in the vicinity.
- **San Diego Unified Port District.** Lands to the west and south of the Historic Mean High Tide Line of San Diego Bay are subject to the San Diego Unified Port Act and the Port Master Plan. These include the majority of the downtown waterfront to the west of Pacific Highway and south of Harbor Drive.
- **California Coastal Commission.** This State agency has jurisdiction over a portion of the lands in the downtown community plan area that are outside of the Port's jurisdiction (the Mean High Tide Line) but within the Coastal Zone. Coastal Development Permits issued by CCDC for new development within this area are appealable to the Commission. The appealable area is generally bounded by Beardsley Avenue to the south, Harbor Drive to the east, and the Downtown Community Plan boundary to the north and west.
- **San Diego Community College District.** City College is the downtown location for the San Diego Community College District. The campus lies in the College neighborhood, and occupies a large piece of property between A and C streets, east of Park Boulevard.
- **San Diego Unified School District.** This school district has jurisdiction over its San Diego High School campus, located north of City College between Park Boulevard and 16th Street, as well as Garfield High School, which is located between 16th and 17th streets, north of B Street and Washington Elementary in Little Italy.



Source: Downtown Community Plan, Port of San Diego Master Plan

Downtown Planning Jurisdictions _____ Figure 4.4-1

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4.5 DOWNTOWN COMMUNITY PLAN

The proposed Downtown Community Plan would be a primary document in the system of plans that governs downtown. It would establish the overall vision for downtown and outline policies to attain this vision. The Downtown Community Plan would also serve as the basis for detailed zoning and development standards as well as a variety of other actions, such as open space acquisitions and transportation improvements. A wide range of planning topics, including structure and land use, parks and open space, urban design, transportation, arts and culture, and historic preservation would be addressed in the Downtown Community Plan, encompassing the full spectrum of issues related to downtown's physical development.

Under the proposed Downtown Community Plan, downtown at buildout would consist of an integrated and connected network of distinct neighborhoods and districts. These include Civic/Core, Columbia, Convention Center, Cortez, East Village, Gaslamp Quarter/Horton Plaza, Little Italy, and Marina. Each would contain a mixed-use center (or, "main street") and a park. The scale would be such that residents and workers would be within a ten-minute walk of open space and neighborhood center amenities (including shops, restaurants, office space, and arts and cultural facilities). Building heights surrounding neighborhood open space would be limited to ensure sun exposure. The Plan encourages maximizing open space by setting aside geologic fault zones for park development.

The boundaries of the neighborhoods and districts, shown in Figure 4.5-1, are based on walkability, existing character, and expected new development types. Compared to the neighborhoods contained in the existing Centre City Community Plan, the boundaries of Little Italy, Columbia, Marina, Core, and Cortez would not change. Horton Plaza and the Gaslamp District would combine to become one district under the proposed Downtown Community Plan. In addition, the East Village neighborhood would be organized into four "sub-districts," including Ballpark, Northwest, Northeast, and Southeast.

Several of downtown's neighborhoods, including Little Italy, Marina, and the Core, are established and not expected to change significantly as a result of the proposed Downtown Community Plan. Other areas, particularly East Village, would undergo major transformations to accommodate increasing residential and commercial activity. As these neighborhoods develop, they would be differentiated from one another by elements such as historic resources, building volumes and intensities, parks and open spaces, land use emphasis, and design.

The Downtown Community Plan would further develop the Core and Columbia neighborhoods to establish them as downtown's business district by regaining employment uses. These neighborhoods would contain a greater density of high-rise office buildings and mixed uses would be allowed in order to promote neighborhood activity during non-working hours. The downtown neighborhoods would be connected by, tree-lined boulevards, such as Broadway, Market Street, Harbor Drive, and Pacific Highway. Certain downtown roadways could also support public transit including the trolley and bus system. Smaller, more pedestrian-oriented "green streets" would link downtown neighborhoods and parks.

As shown in Table 4.1-1, the proposed Downtown Community Plan would depart from the land use intensities assumed by SANDAG for existing 1992 Centre City Community Plan by further increasing intensity and density of land uses and increasing resident and employment populations.

In addition the proposed Plan would provide more park space, orient downtown's neighborhoods around mixed-use centers, and connect neighborhoods through Boulevards, Green Streets, and freeway lids.

TABLE 4.1-1
Downtown Land Use and Demographics under Existing Conditions, the 1992 Centre City Community Plan, and the Proposed Downtown Community Plan

LAND USE/ DEMOGRAPHIC CATEGORY	EXISTING	1992 COMMUNITY PLAN BUILDOUT	PROPOSED UPDATE 2030
Population	27,500	48,000	89,100
Employment	74,500	117,000	167,700
Residential (units)	14,600	30,700	53,100
Office (s.f.)	9,473,000	20,700,000	22,028,000
Office (Civic) (s.f.)	3,671,000	NA	7,793,000
Culture and Education (s.f.)	1,508,000	NA	2,560,000
Retail (s.f.)	2,658,000	4,300,000	6,070,000
Hotel Rooms	8,800	15,600	20,000
Other	2,180,000	NA	2,780,000

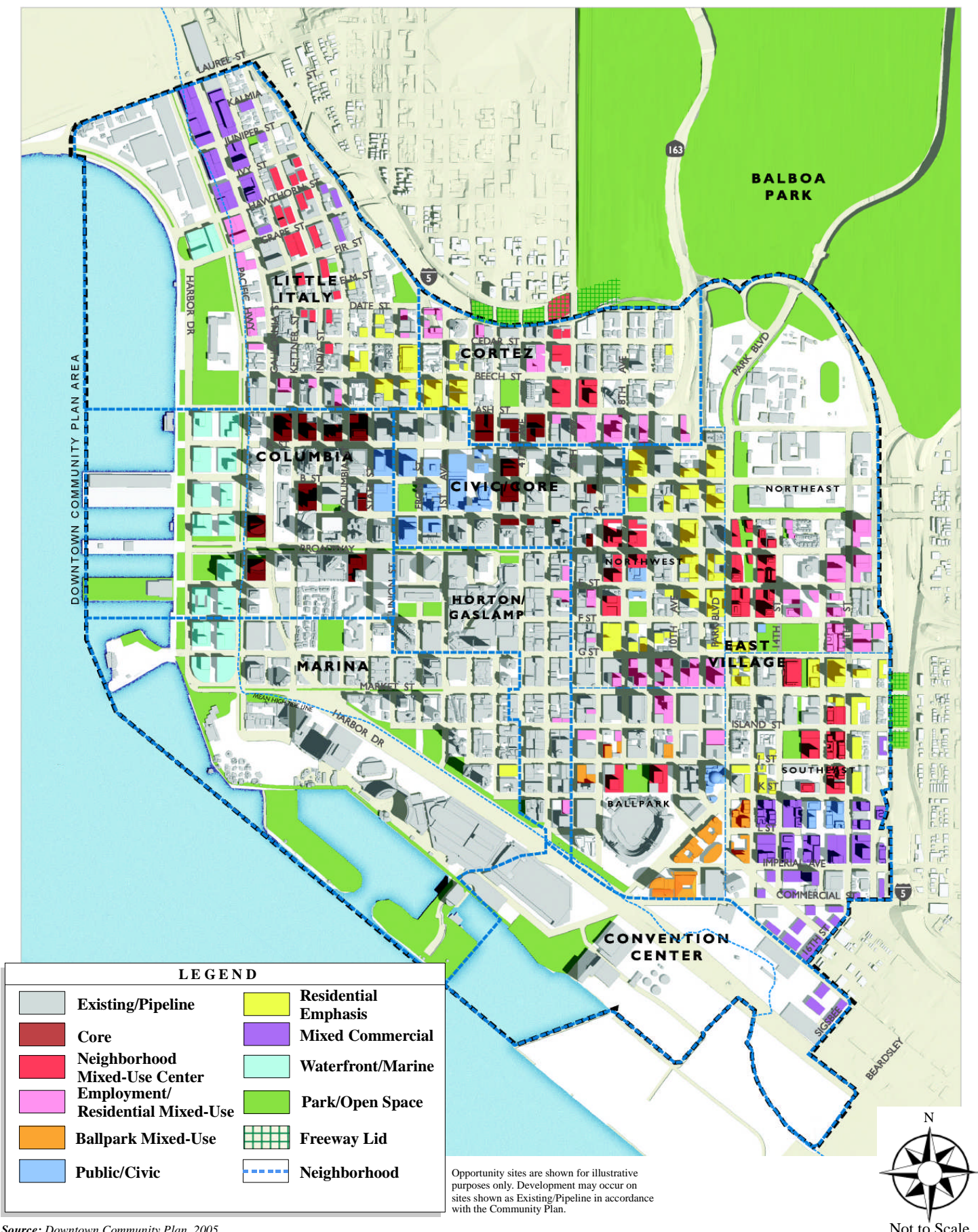
Source: Downtown Community Plan 2005 and, SANDAG, www.sandag.org.

The Downtown Community Plan is organized into four parts and 14 chapters. Each part deals with general planning topics such as Physical Development, Transportation and Public Facilities, and Community Development. The chapters identify specific topics within each of the four parts. Each chapter contains goals and policies describing major objectives and implementing actions. Goals express broad intent; and policies reflect specific direction, practice, guidance, or directives. Where appropriate, standards (items that can be mapped or measured) are articulated. These standards may be fixed (such as building heights) or performance based (such as noise). The following discussion summarizes each chapter of the proposed Downtown Community Plan and the goals and policies within them.

4.5.1 PART 1: OVERVIEW

4.5.1.1 Introduction and Overview (Chapter 1)

This chapter outlines the overall vision for downtown's long-range physical development that reflects the aspirations of the community.



Source: Downtown Community Plan, 2005

Proposed Neighborhoods and Districts

Figure 4.5-1

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4.5.1.2 The Planning Process (Chapter 2)

Chapter 2 highlights the purpose and objectives of the Downtown Community Plan, which were described in Section 4.3. In addition, this chapter explains the relationship of the Downtown Community Plan with other downtown plans, development regulations, and guidelines.

4.5.2 PHYSICAL DEVELOPMENT (PART 2)

4.5.2.1 Land Use and Housing (Chapter 3)

This chapter contains six subsections, each containing goals and policies. The six subsections are entitled Structure and Land Use; Development Intensity and Incentives, and Plan Buildout; Housing; Affordable Housing; Neighborhoods and Centers; and, Large facilities. Combined, these chapters would balance neighborhood development with an array of uses, improved pedestrian and vehicular connections, and better integration with the waterfront, Balboa Park, and surrounding communities.

Chapter 3 focuses on strategies to:

- Ensure an overall balance of uses that furthers downtown's role as the premier regional population, commercial, civic, cultural, and visitor center;
- Foster a diverse mix of uses in each neighborhood to support urban lifestyles;
- Achieve building intensities that ensure efficient use of available land;
- Attain an overall employment level of 165,000 quality jobs to reflect downtown's role as the premier employment center in the region;
- Target a residential buildout population of 90,000 people of diverse incomes to create vitality, a market for a broad array of supporting stores and services, and opportunities for living close to jobs and transit; and
- Enhance livability through arrangement of land uses and development intensities, including development of a system of neighborhoods sized for walking.

Structure and Land Use (Chapter 3.1)

The Downtown Community Plan envisions an overall intensification of development downtown. As illustrated in Figure 4.5-2, the Civic/Core would acquire a greater mix of uses and would be complemented by neighborhood mixed-use centers distributed throughout downtown. The "grid" street system would be maintained, and extended to the waterfront in places where reuse is envisioned. Larger parcels at the western waterfront would be broken up to create a mixed-use district and promote vitality. Downtown's street grid would be reinforced with a design that emphasizes pedestrian accessibility and connectivity. Certain streets at the waterfront, civic center, and bus yards that are currently closed would be re-opened to facilitate movement. Finally, a substantial increase in building intensity would be anticipated and encouraged.

Land Use Classifications

Chapter 3.1 includes a classification system that identifies the types of land uses that are proposed for downtown. These land use categories are also shown on the Land Use Map (Figure 4.5-3). The land use categories are meant to be broad enough to provide flexibility in implementing policy, but

clear enough to provide sufficient direction to carry out the Downtown Community Plan. In addition to the uses allowed in each category, public uses (including government offices, police and fire stations, and public schools) would be permitted in all land use classifications. Each land use category is described below.

Ballpark Mixed-Use

Mixed uses in the Ballpark District would accommodate major sporting events and visitor attractions. The classification would allow a broad array of other uses, including restaurants, hotels, offices, research and development facilities, cultural and residential uses, live/work use, and parking.

Core

This classification is primarily intended to encourage, support, and enhance the Core as a high-intensity office and employment center. The Community Plan supports the Core's role as a center of regional importance and as a primary hub for business, communications, office, and visitor accommodations, with fewer restrictions on building bulk and tower separation than in other districts. The Core accommodates mixed-use (office combined with hotel, residential, and other uses) projects as important components of the area's vitality. Retail, cultural, educational, civic and governmental, and entertainment uses would also be permitted. All development would be required to be pedestrian-oriented.

Employment/Residential Mixed-Use

This classification would provide synergies between educational institutions and residential neighborhoods, or transition between the Core and residential neighborhoods. It also encompasses Horton Plaza. This classification would permit a variety of uses, including office, residential, hotel, research and development, and educational and medical facilities.

Mixed Commercial Flexible-Use

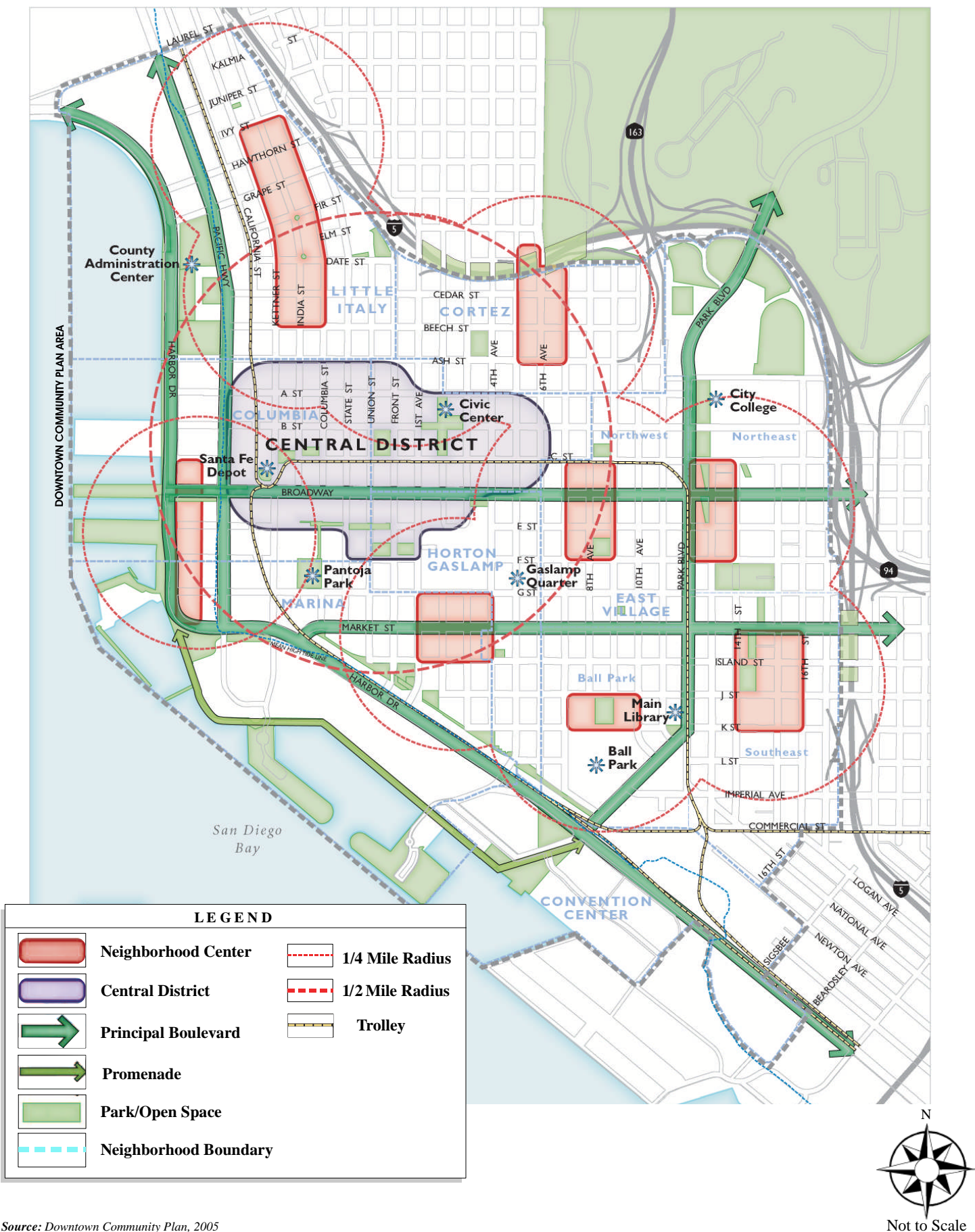
This classification would accommodate a diverse array of uses, including residential, artists' studios, live/work spaces, hotels, offices, research and development, and retail, and allow continuing operation of existing service and industrial uses – including light industrial and repair, warehousing and distribution, transportation and communication services. Any new industrial and service use will be required to demonstrate that air quality in surrounding residential uses and neighborhoods (such as Barrio Logan) is not adversely impacted.

Industrial

This classification would permit a range of industrial uses such as light manufacturing, repair and storage, as well as energy-generation facilities, subject to performance standards.

Neighborhood Mixed-use Center

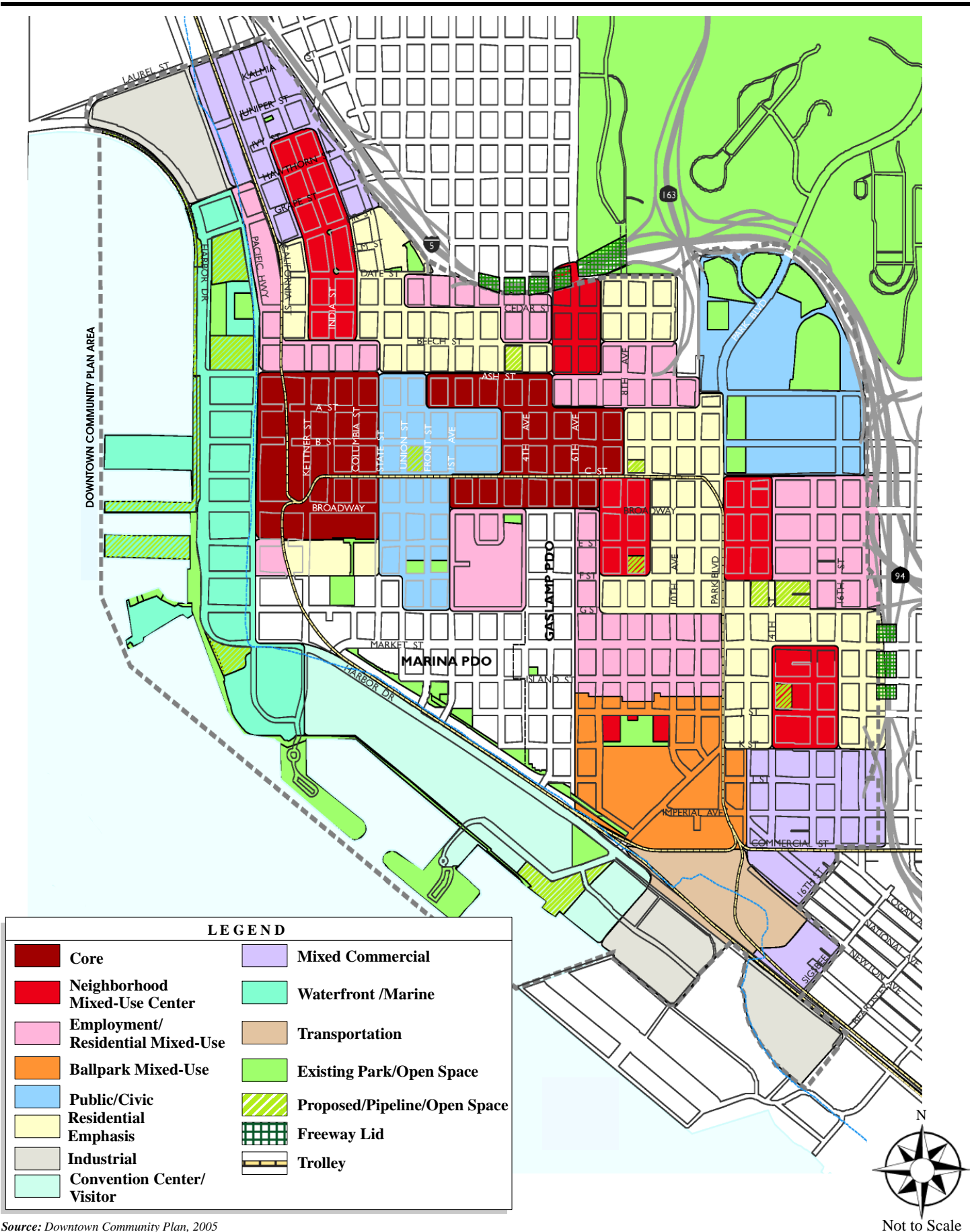
This classification is intended to ensure development of distinctive centers around plazas or “main streets” that provide a focus to the neighborhoods. It would support mixed-use (residential/nonresidential) projects that contain active ground-floor uses. A broad array of compatible uses, including retail, restaurants, residential, office, cultural, educational, and indoor recreation would be permitted, with active ground floor uses. Building volume restrictions would be



Proposed Downtown Structure

Figure 4.5-2

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Source: Downtown Community Plan, 2005



Proposed Land Use Map

Figure 4.5-3

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applied to allow sunlight to reach streets and public spaces, and design standards would establish pedestrian-oriented development.

Park/Open Space

The classification is intended to allow public parks and open spaces. Below ground parking facilities and small cafes would also be permitted, subject to performance standards.

Public/Civic

The classification would provide a center for government, civic, cultural, educational, and other public uses.

Residential Emphasis

The Residential emphasis areas would accommodate primarily residential development. Small-scale businesses, offices, and services, and ground-floor commercial uses (such as cafes and drycleaners) would also be allowed, provided they would not exceed 20 percent of the overall building area.

Waterfront/Marine

This classification would support a range of maritime-related uses, including ocean-related industry, major tourist and local visitor attractions, trade, office, eating and drinking establishments, markets, retail, parking, museum and cultural facilities, and hotel, predominantly in the Port District's jurisdiction.

Convention Center/Visitor

Convention center, hotel, and parks and open spaces would be permitted under this classification.

Transportation

This district accommodates uses related to trolley, passenger and freight rail operations, maintenance and repair, and associated activities.

Employment Required Overlay

In addition to the land use classifications, the Employment Required Overlay (Figure 4.5-4) Employment Overlay Area would identify areas where at least 50% of the occupied building area on a parcel would be required to contain office, education, retail, and other commercial uses. This overlay is intended to assure that sufficient area would remain to accommodate future employment uses to help assure a good jobs/housing balance.

Development Intensity and Incentives, and Plan Buildout (Chapter 3.2)

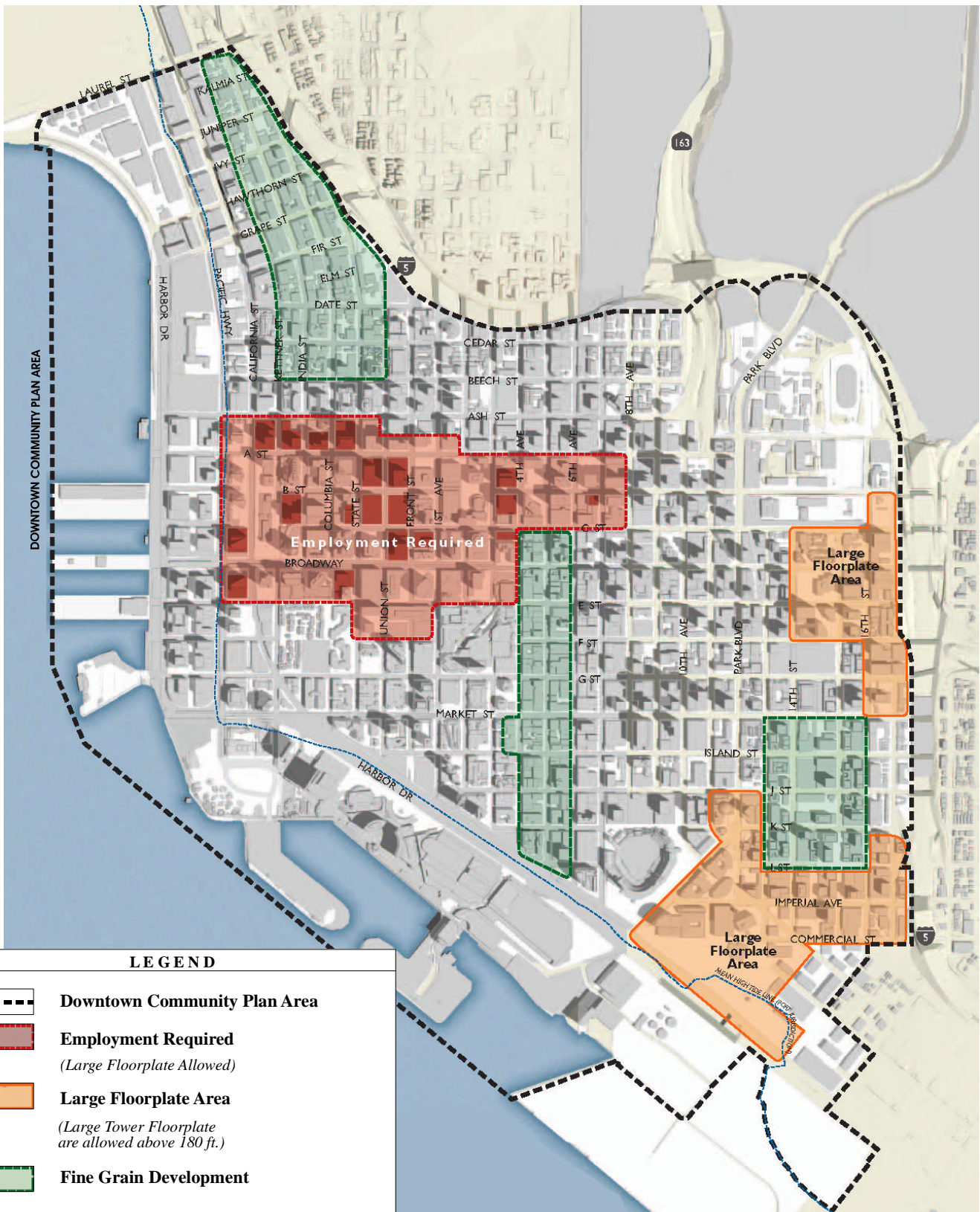
Chapter 3.2 describes the development intensity, incentive programs, and the anticipated buildout of downtown. Development intensity would be measured as Floor Area Ratio (FAR), which is the gross floor area divided by lot area. Figure 4.5-5 shows the allowable maximum and minimum FARs for downtown. Without incentives, maximum FARs throughout downtown would range between 2.0 and 12.0. With the various incentives described below, the FAR in some portions of the Plan area could be as high as 20.0.

The Downtown Community Plan would target a residential population of 89,100 persons and an employment population of 167,700 persons by 2030. Table 4.1-2 shows the projected buildout of the Downtown Community Plan in the year 2030 on a neighborhood basis compared with the existing development levels. The estimated buildout condition in downtown is based on two fundamental assumptions. First, future development downtown is assumed to occur primarily on sites which are currently vacant or developed with buildings that do not meet earthquake standards or represent a substantial underutilization of land when compared to the proposed land use classification. Many of the parcels which are currently developed with serviceable buildings or significant historic buildings were assumed to remain unchanged through the year 2030. However, as indicated on page 3-26 of the Proposed Community Plan, “Designation of a site for certain use does not necessarily mean that the site will be built/redeveloped with the designated use within the horizon of the Plan. Similarly, sites that are not anticipated to be redeveloped may actually be reused.” Second, in predicting the amount of development that would occur on those parcels anticipated to be redeveloped, an average level of development, 80% of the maximum FAR, was assumed rather than the maximum allowed by the land use classification. Assuming an average intensity is considered appropriate for a number of reasons. For office space, buildout to maximum intensity within the 2030 timeframe would be economically infeasible as the quantity of office space would exceed the estimated demand for the entire San Diego region. It is unreasonable to assume that no office space would be built in the other portions of the region. In addition, there are intensity constraints imposed by design regulations such as setbacks and stepbacks.

Four kinds of incentives/exemptions programs to promote vital neighborhood centers, affordable housing, historic conservation, and public improvements are identified:

- **Retail Along Active Streets.** To facilitate vital retail districts in strategic locations, the Downtown Community Plan would exempt retail/commercial uses and other public uses on the ground floor from FAR calculations on main streets.
- **Historical Resources.** The gross floor area of a designated historic structure would be excluded from the calculation of the total FAR of the project so long as the historic, and/or architectural character of the structure is rehabilitated and not adversely affected.
- **Affordable Housing.** A maximum 35% FAR bonus (applied to the residential component of a project) would be available for projects meeting on-site affordable housing requirements, as provided in Section 65915 of the California Government Code.
- **Specific Amenities and Improvements.** In specific locations, increases in FARs (beyond the Base FARs) would be allowed for provision of improvements or amenities over and beyond those required as part of normal development requirements. Criteria for fulfilling these requirements would be spelled out in detail in the PDO.

In addition, a Transfer of Development Rights (TDR) program would be established to help with the acquisition of land for new public parks and preservation of historical resources as long as the historic, and/or architectural character of the structure is rehabilitated and not adversely affected. All sites designated for public parks that are in private ownership would be eligible to transfer or sell their development rights to a “TDR bank” or receiving sites identified in the Community Plan that



LEGEND

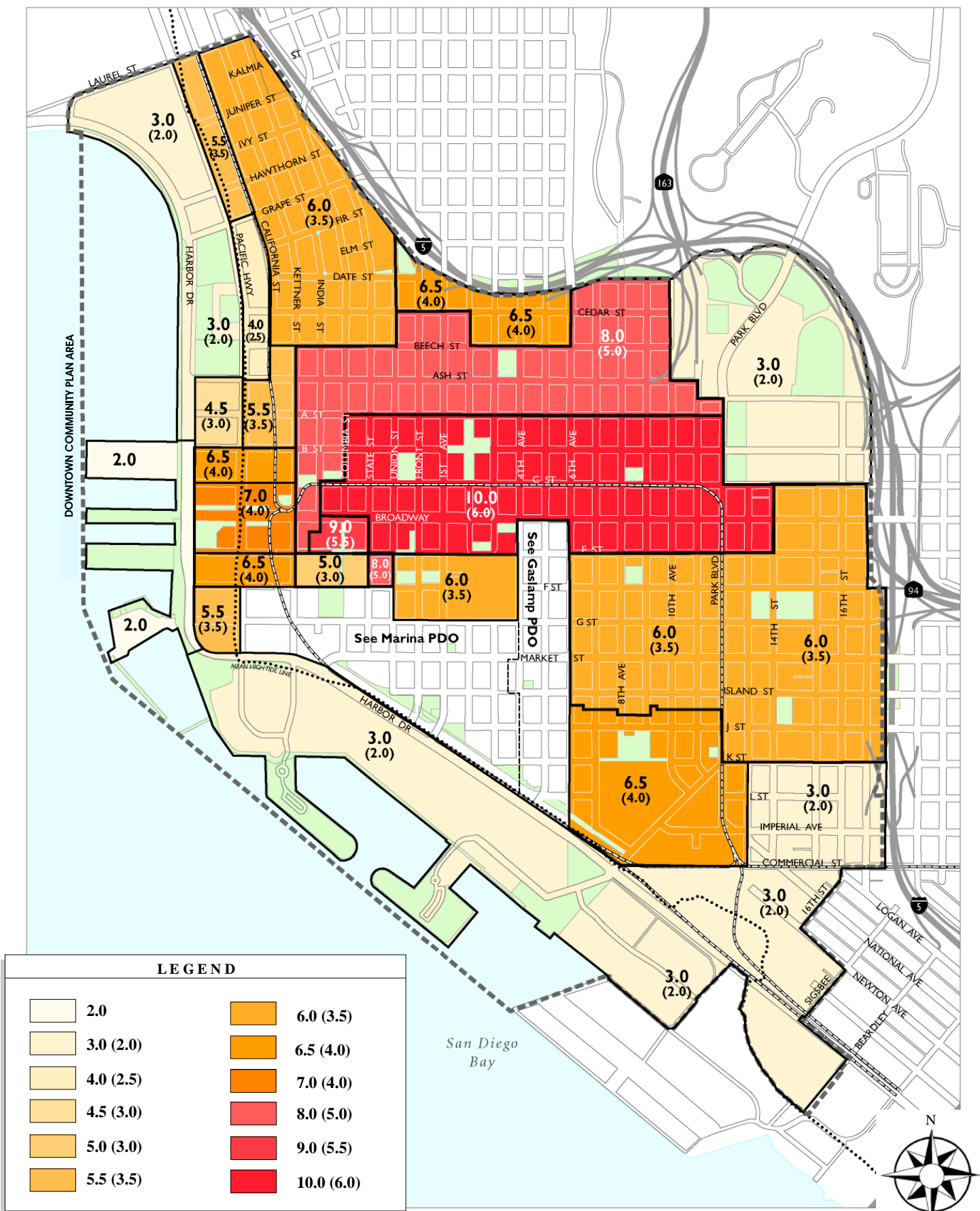
- Downtown Community Plan Area**
- Employment Required**
(Large Floorplate Allowed)
- Large Floorplate Area**
(Large Tower Floorplate are allowed above 180 ft.)
- Fine Grain Development**



Source: Downtown Community Plan, 6/2005

Employment Overlay Area _____ Figure 4.5-4

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Source: Downtown Community Plan, 2005



Proposed Minimum and Maximum FARs _____ Figure 4.5-5

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**Table 4.1-2
Existing vs. Proposed Land Use by District**

LAND USE TYPE	EXISTING	PROPOSED BUILDOUT
LITTLE ITALY DISTRICT		
Residential	1,974 units	7,970 units
Office	978,853 s.f.	1,925,401 s.f.
Civic Office	208,000 s.f.	208,000 s.f.
Culture and Education	20,300 s.f.	63,903 s.f.
Retail	266,191 s.f.	380,607 s.f.
Hotel Rooms	1,134 rooms	1,261 rooms
Other	--- s.f.	--- s.f.
CORTEZ DISTRICT		
Residential	2,700 units	6,238 units
Office	716,737 s.f.	1,192,836 s.f.
Civic Office	85,831 s.f.	85,831 s.f.
Culture and Education	125,000 s.f.	327,761 s.f.
Retail	67,300 s.f.	187,744 s.f.
Hotel Rooms	635 rooms	667 rooms
Other	--- s.f.	--- s.f.
CIVIC/CORE DISTRICT		
Residential	684 units	1,274units
Office	4,169,900 s.f.	4,916,716 s.f.
Civic Office	1,085,618 s.f.	2,857,072 s.f.
Culture and Education	139,500 s.f.	124,500 s.f.
Retail	253,000 s.f.	402, s.f.
Hotel Rooms	1,116 rooms	1,530 rooms
Other	--- s.f.	--- s.f.
COLUMBIA DISTRICT		
Residential	1,132 units	3,859 units
Office	2,503,031 s.f.	6,043,011 s.f.
Civic Office	939,871 s.f.	3,290,227 s.f.
Culture and Education	115,495 s.f.	151,464 s.f.
Retail	183,880 s.f.	685,234 s.f.
Hotel Rooms	2,003 rooms	4,321 rooms
Other	--- s.f.	--- s.f.

Table 4.1-2 (Continued)
Existing vs. Proposed Land Use by District

LAND USE TYPE	EXISTING	PROPOSED BUILDOUT
MARINA DISTRICT		
Residential	3,587 units	3,912 units
Office	24,113 s.f.	243,431 s.f.
Civic Office	474,772 s.f.	474,772 s.f.
Culture and Education	26,065 s.f.	66,630 s.f.
Retail	386,813 s.f.	1,002,975 s.f.
Hotel Rooms	3,449 rooms	4,178 rooms
Other	880,000 s.f.	880,000 s.f.
GASLAMP QUARTER/HORTON PLAZA DISTRICT		
Residential	1,131 units	1,553 units
Office	1,277,154 s.f.	1,405,032 s.f.
Civic Office	631,575 s.f.	631,575 s.f.
Culture and Education	81,869 s.f.	109,649 s.f.
Retail	1,691,724 s.f.	1,824,256 s.f.
Hotel Rooms	1,015 rooms	2,350 rooms
Other	--- s.f.	--- s.f.
EAST VILLAGE DISTRICT		
Residential	4,531 units	28,182 units
Office	852,087 s.f.	6,236,566 s.f.
Civic Office	158,000 s.f.	158,000 s.f.
Culture and Education	1,483,384 s.f.	1,716,185 s.f.
Retail	930,250 s.f.	1,579,979 s.f.
Hotel Rooms	1,288 rooms	4,164 rooms
Other	420,000 s.f.	420,000 s.f.
CONVENTION CENTER DISTRICT		
Residential	--- units	143 units
Office	--- s.f.	65,107 s.f.
Civic Office	87,500 s.f.	87,500 s.f.
Culture and Education	--- s.f.	--- s.f.
Retail	--- s.f.	6,427 s.f.
Hotel Rooms	--- rooms	1,531 rooms
Other	880,000 s.f.	1,480,000 s.f.

would be able to add the development rights from the park site to its own. Also, “excess” FAR from listed historical resources could be sold to adjacent properties, as provided in the Centre City PDO.

Housing (Chapter 3.3)

Chapter 3.3 would promote an intense and wide-range of housing choices, meeting the various needs of a mixed population. Housing would take many forms in downtown, from luxury penthouses to single-room occupancy (SRO) hotels, compact living units (CLUs), studios, lofts, living units, and rental and ownership multi-room units. While mostly concentrated in neighborhoods with residential emphasis, housing would also be considered an integral part of mixed-use centers and districts.

Affordable Housing (Chapter 3.4)

Chapter 3.4 would promote the development of affordable housing to meet the needs of a diverse population. A minimum percentage of affordable housing is a requirement of California Redevelopment Law for all redevelopment project areas, including downtown.

Neighborhoods and Centers (Chapter 3.5)

Chapter 3.5 defines the downtown neighborhoods proposed by the Downtown Community Plan (discussed fully in Chapter 6: Neighborhoods and Districts). Neighborhoods would be based on walkability, existing character, and expected new development types. Elements such as historic structures, building volumes, parks and open spaces, land use emphasis, and design would combine to provide each a sense of individual identity. Each neighborhood would be served by at least one neighborhood center that would provide amenities necessary for daily life and a focal core of activity.

Large Facilities (Chapter 3.6)

Chapter 3.6 defines large facilities as those with footprints exceeding one block. Although large facilities have contributed to redevelopment success downtown, further development of large facilities would need to be balanced against maintaining designated public views, connections between neighborhoods, and the integrity of the street grid. Goal 3.6-G-1 would allow facilities only in appropriate locations, and provided that projects do not interrupt community fabric, street grid, designated public views, or the viability of Neighborhood Centers, and that facilities be designed to be compatible in scale and texture with surrounding uses.

4.5.2.2 Parks, Open Space, and Recreation (Chapter 4)

Chapter 4 describes the proposed open space system for downtown, which would be designed to emphasize linkages between residential uses, parks, and Neighborhood Centers, and improve connections to Balboa Park and the waterfront. The open space system would enable downtown residents to live within an approximately five-minute walk of at least one park or plaza. Open space at buildout of the Downtown Community Plan in 2030 would comprise up to 131 acres and be composed of parks, plazas, and freeway lids. In addition, all residential projects downtown would be required to incorporate common open spaces onsite, such as courtyards and terraces, for residents.

As discussed earlier, a Transfer of Development Rights incentive program would be established to help finance the acquisition of park space and preserve historic buildings. This would potentially allow proposed open space site owners to sell development rights to property owners in higher-intensity areas of downtown (Policy 4.1-P-3).

4.5.2.3 Urban Design (Chapter 5)

Chapter 5 contains nine subsections, each containing specific goals and policies. Overall, Chapter 5 focuses on issues of public realm, identity, character, and experience for downtown's residents, workers, and visitors, and includes strategies to accomplish the following:

- Maximize the advantage of San Diego's climate and downtown's waterfront setting by emphasizing the public realm (streets and public spaces) more so than individual buildings;
- Foster vital and active street life; and maximize sunlight penetration into streets and open spaces;
- Build upon natural features and historical assets to promote richness and diversity;
- Ensure that development is designed with a pedestrian orientation;
- Promote fine-grained development, where appropriate, while enabling desired development intensities to be achieved; and,
- Provide direction for more detailed guidelines and capital project designs.

Street Grid and Views (Chapter 5.1)

Chapter 5.1 focuses on downtown's street pattern and the opportunity to maintain important public views. Downtown's street grid is regular, made up of small blocks, and contains frequent intersections. The Downtown Community Plan would ensure that new large developments would not create grid interruptions in order to preserve connections within downtown and accommodate pedestrians. In addition, streets that provide entry to and exit from downtown would be enhanced with special streetscape treatments and landscaping to emphasize the importance of crossing into downtown. Finally, views of the San Diego Bay, Balboa Park, local parks, and landmark buildings would be considered significant downtown assets. The Downtown Community Plan designates view corridors and outlines design criteria to preserve and reinforce existing views. View policies focus on streets and public spaces, rather than on private views from buildings.

Centers and Main Streets (Chapter 5.2)

Neighborhood centers would be concentrations of activity that would provide retail, services, and other amenities. The Downtown Community Plan would provide centers for all of downtown's neighborhoods to ensure that all residents would be within less than a ten-minute walk from everyday activities. Generally, the centers would be organized around small plazas or main streets. The plaza "type" would follow the concept of the Spanish-Colonial square, in which a landscaped block is surrounded by mixed-use buildings with commercial functions on the ground floor. Main streets (all in a north-south axis to take advantage of the long side of downtown's blocks and maximize daylight on streets) would be approximately three to five blocks in length. Neighborhood centers would be practical destinations for errand running, nodes for local public functions, and gathering areas for social and recreational use.

Bulk, Skyline, and Sun Access (Chapter 5.3)

Chapter 5.3 addresses sun access to public spaces, bulk control of building height, and the development of the downtown skyline. The Downtown Community Plan would ensure that sunlight reaches the most frequented public spaces, such as parks and neighborhood centers, during certain periods of time (see Figure 4.5-6). New parks and neighborhood centers would be sited in areas where they would not be shaded by existing tall buildings.

Bulk controls included in the Downtown Community Plan would address the architectural design of specific projects in order to minimize intrusiveness and maximize sky exposure from the streets.

Bulkier buildings would be allowed in certain neighborhoods such as the Civic/Core and portions of East Village to accommodate employment-oriented uses. In addition, larger buildings would be allowed north of parks and in the northernmost blocks of neighborhood centers, as these locations would be less likely to cast shadows on important public spaces. The variety of uses and floor plate sizes, as well as bulk standards, would prevent business-oriented streets from becoming dark canyons.

The Downtown Community Plan would prevent the skyline from becoming too dispersed by creating two zones of concentrated very high intensity: the Civic/Core and East Village. “Peaks” would be added to the skyline, giving focus points to the eye.

Streetscape and Building Interface (Chapter 5.4)

Chapter 5.4 focuses on the development of streetscapes to promote movement and pedestrian comfort. The Downtown Community Plan envisions the street network as a landscaped system with improved sidewalk treatments, seating opportunities, distinctive lighting, and public art, as well as bicycle paths in appropriate locations. Concentrated street-front activity would enliven certain stretches, making them errand-running and social nodes. Certain streets would become destinations in themselves, offering recreational and gathering opportunity. At the building-street interface, residential units would be placed at the ground level to enable a closer relationship between the private and public realms, put “eyes on the street,” and provide visual interest for pedestrians.

Waterfront (Chapter 5.5)

Chapter 5.5 defines the Waterfront/Marine District. The majority of the area is under the jurisdiction of the San Diego Unified Port District; however, several public agencies, including CCDC, collaborated in the adoption of the North Embarcadero Alliance Visionary Plan. The Downtown Community Plan incorporates the components of the North Embarcadero Alliance Visionary Plan to transform the waterfront into a citywide attraction that contains active pedestrian-oriented uses and connects to downtown neighborhoods.

The Downtown Community Plan would preserve and create views along the Waterfront by requiring all buildings to comply with view corridor setbacks. Future view corridors would be required to maintain visual and physical access to the Bay and buildings taller than 120 feet in the waterfront to be oriented so as to present the smaller face along the view corridors toward the water (Policy 5.5-P-3). ~~The extension of streets~~

Linkages to Surrounding Neighborhoods (Chapter 5.6)

Chapter 5.6 promotes the trend toward reintegration of the downtown area with surrounding neighborhoods and areas. To provide linkage with Uptown, Balboa Park, and neighborhoods to the east, the Downtown Community Plan proposes the construction of one or more “lids” over I-5, which would be developed with open space and/or cultural amenities. Pedestrians would be able to walk over the lids, which, in the north, would connect Balboa Park and surrounding neighborhoods to downtown’s Cortez neighborhood. In the east, freeway lids would connect Sherman Heights with southeast downtown. One of the lids could allow an extension of a street (Eighth Avenue) from Cortez into Balboa Park. In addition to freeway lids, connections would be provided through enhanced streetscapes on important connecting surface streets and improvements to gateways at key access points.

Wayfinding and Signs (Chapter 5.7)

Chapter 5.7 addresses wayfinding to assist visitors to downtown with navigating their way around downtown. The Downtown Community Plan would expand the wayfinding sign program to direct drivers and pedestrians to principal destinations and nearby parking. Chapter 5.7 also outlines sign policies to ensure that signs on private developments avoid becoming a nuisance to nearby properties and do not dominate the appearance of downtown or its streets.

Sustainable Development (Chapter 5.8)

Chapter 5.8 addresses the need to insure that future growth and development downtown occur in such a way that is promotes infill, adaptive reuse, and redevelopment to reduce auto dependence and make efficient use of land. In addition, green building would be encouraged to reduce urban heat island impacts, increase energy-efficiency, and promote hydrologic benefits.

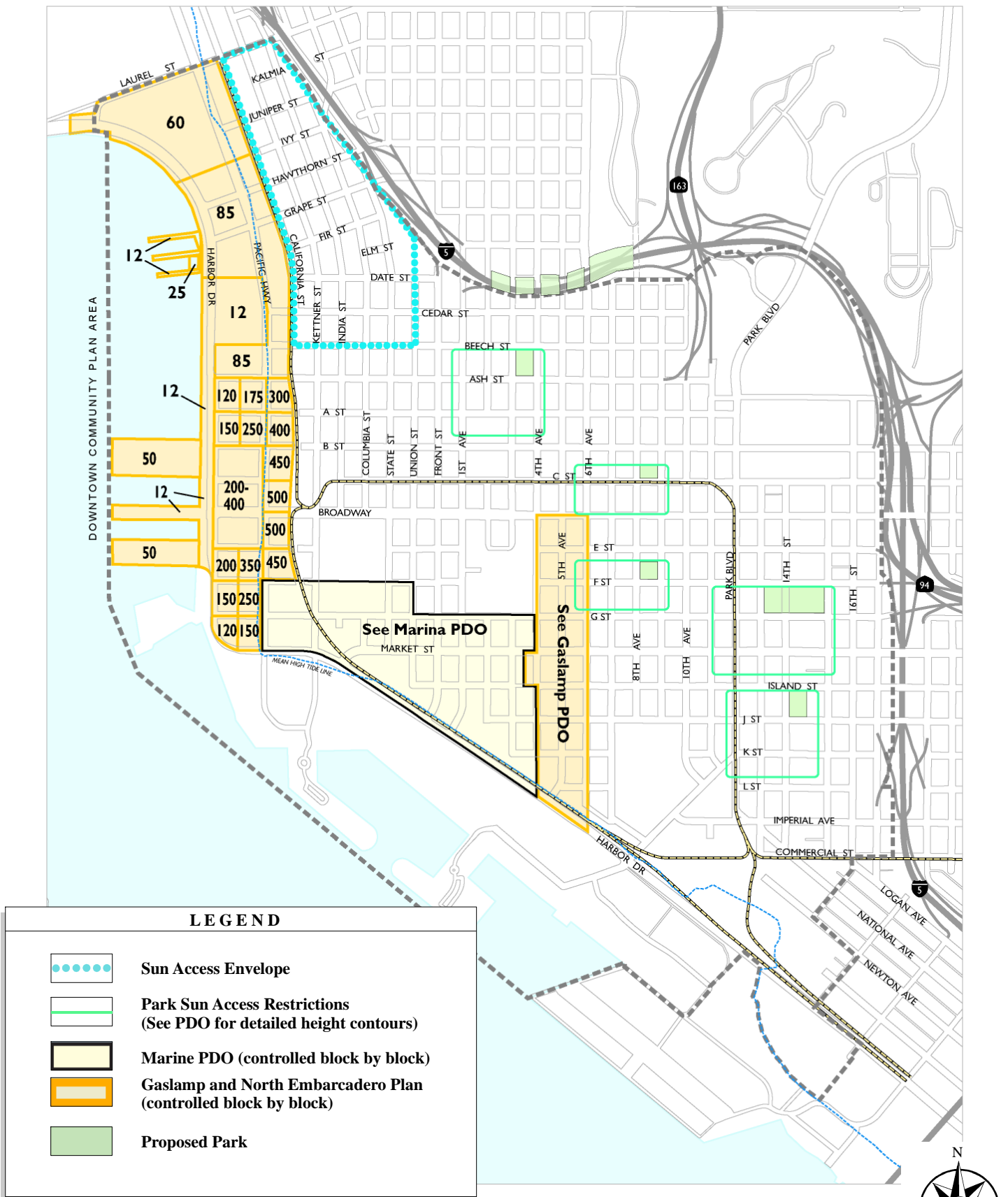
Project Design Review (Chapter 5.9)

To anticipate the complexity of future development activities downtown, the Downtown Community Plan seeks to improve and streamline the CCDC design review process to ensure architectural and urban design excellence and a high-quality public realm throughout downtown.

4.5.2.4 Neighborhoods and Districts (Chapter 6)

The Downtown Community Plan envisions downtown as a collection of unique neighborhoods, varying in function, history, topography, building scale, and public spaces. As downtown development proceeds under the proposed Downtown Community Plan, all neighborhoods would contain a mix of employment, residential, retail, cultural, visitor-serving, and open space components. The Downtown Community Plan would ensure that each neighborhood contain the following:

- A Main Street or Neighborhood Center with a mix of retail, services, housing, employment, civic, and/or cultural uses that reinforces distinctive neighborhood traits;
- A significant park or open space feature;



Source: Downtown Community Plan, 2005

Building Height and Sun Access Controls _____ Figure 4.5-6

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- Linkage to the rest of downtown and neighborhoods surrounding downtown via Green Streets; and
- Urban form that protects sunlight in major parks and the finer-grain Neighborhood Center/Main Street area.

The Downtown Community Plan describes the character and qualities of each proposed neighborhood and outlines policies to guide their development. The proposed neighborhoods include Civic/Core, Columbia, Marina, Horton Plaza/Gaslamp Quarter, East Village (and four sub-districts, including Ballpark, Northeast, Northwest, and Southeast), Cortez, Little Italy, and Convention Center.

Civic/Core (Chapter 6.1)

The Civic/Core neighborhood would be located in the north-central portion of the downtown planning area. The neighborhood is not anticipated to experience major changes as many of its features are already established. A greater variety of land uses would be permitted including hotels and residential development. However, as discussed earlier, an Employment Required Overlay would be placed over the Civic/Core to assure the future development of employment uses.

Some of the major civic uses there, such as the Civic Center and certain government buildings, are slated for redevelopment. The redeveloped ~~City~~ government complex is anticipated to become the functional center of the neighborhood, potentially resulting in the development of a new full-block park.

Columbia (Chapter 6.2)

The Columbia neighborhood would be located between the Civic/Core neighborhood and the waterfront on the western edge of downtown. Though largely established, the Downtown Community Plan anticipates the emergence of two distinct areas. High-intensity office, residential and hotel buildings would be encouraged inland of Pacific Highway. Plazas, the C Street Corridor, Santa Fe Depot, and museums would add cultural and recreational interest. A mixed-use center would be planned for the waterfront between Pacific Highway and the San Diego Bay.

Views of the Bay would be accomplished by extending the existing street grid west to the waterfront. Future development would occur at fairly high intensities, however, building heights would step down toward the water in order to preserve view corridors.

Marina (Chapter 6.3)

Marina, occupying the southwest quadrant of the downtown planning area, is downtown's most complete residential neighborhood and is not anticipated to experience much change as a result of the Downtown Community Plan.

Marina's Neighborhood Center would be located on Market Street between Front Street and Third Avenue. In addition, Marina currently contains a variety of open space opportunities for the downtown area at Pantoja Park, the Martin Luther King Jr. Promenade, and the South Embarcadero. The Downtown Community Plan anticipates redevelopment at the Navy Broadway Complex and the

Port controlled Old Police Headquarters and Seaport Village. In addition to mixed-use development, these activities would result in the parks connecting Harbor Drive to the water and the extension of the street grid. The Asian Pacific Thematic Historic District would continue to provide historic context to the neighborhood.

Horton Plaza/Gaslamp Quarter (Chapter 6.4)

Located in the center of the downtown planning area, Horton Plaza/Gaslamp Quarter would experience few changes under the Downtown Community Plan as it is nearly built out. It would continue to serve the downtown community and tourism through its popular outdoor mall and the shopping, restaurants, nightclubs, offices, services, movie theaters, galleries, live performance theaters, residences, hotels and parking garages within the historic Gaslamp. Given the attraction as downtown's entertainment and cultural district, the Downtown Community Plan would not designate a mixed-use Neighborhood Center here. Instead, the proposed Plan would maintain the area's high activity levels, rejuvenate open spaces, and protect the Gaslamp's historic qualities.

East Village (Chapter 6.5)

The East Village District would experience one of the greatest amounts of development in downtown. The area would develop as a residential district complemented by Neighborhood Centers, employment areas, flexible use zones and public spaces. A variety of activities, ranging from academic endeavors at City College to entertainment at Petco Park, arts at the anticipated new Main Library and human services would ensure the area maintains an eclectic character.

Various portions of East Village would have substantially different characters. As reflection of these differences, East Village would be divided into the following sub-districts.

Ballpark Sub-district

The Ballpark sub-district would be located in the area around Petco Park, east of the Gaslamp. The Downtown Community Plan envisions the Ballpark neighborhood to be an entertainment, cultural, and residential district, containing Petco Park and the future Main Library as key amenities. Open space would be provided by Park at the Park, located directly north of Petco Park. East Village Square, which includes high-rise buildings on either side of Park at the Park, north of the ballpark, would serve as the neighborhood mixed-use center. Mid- to high-rise residential, hotel, social services, office, and ground-level retail would be allowed in the neighborhood. As this area currently contains some low-rise historic warehouse buildings, the preservation of historic structures would contribute to neighborhood character and identity.

Southeast Sub-district

This sub-district would be located in the southeast of the downtown planning area between Ballpark and I-5, and would be expected to change as a result of the proposed Plan. The Downtown Community Plan would allow a mix of residential, office, retail, and convention center growth, while retaining light industrial uses and support infrastructure such as auto repair shops and social services. Residential uses would be permitted throughout the neighborhood, but would concentrate in the northern portion of the neighborhood (north of K Street). Southeast would have a

Neighborhood Center surrounding Rose Park, which would be potentially complemented by adjacent convention Center activities.

Northwest Sub-district

This proposed sub-district would be located north of Ballpark. Northwest is proposed to be one of downtown's residential cores. Residential towers would share the area with offices and ground-level commercial uses. A new Neighborhood Center would focus along Eighth Avenue, taking on a "Main Street" quality. The southern edge of the main street would be defined by the Central Library and Post Office, with the southern two-thirds of the Post Office site converted to a park. A second park would be located at the northern end of the center on Eighth Avenue and C Street.

Northeast Sub-district

This sub-district would be located in the northeast of the downtown planning area, surrounding the City College and Garfield High School campuses. The Downtown Community Plan envisions this neighborhood as developing mixed uses with a concentration of open space and an academic focus. Office uses would be encouraged in proximity to I-5. In addition, a large mixed-use center would be located between Park Boulevard and 16th Street to accommodate the residential uses proposed in the southern portion of the neighborhood. A 4.1-acre park, East Village Green, would be located adjacent to the mixed-use center and could become downtown's largest inland park.

Cortez (Chapter 6.6)

The Cortez neighborhood would be located on the northern edge of downtown adjacent to I-5 and Balboa Park. The Downtown Community Plan designates a mixed-use center focused around a park located near downtown's highest elevation at Cortez Hill between Fifth and Sixth avenues. With the completion of a new I-5 "lid" and extension of Eighth Avenue across the freeway, Cortez could provide vehicular as well as pedestrian access from Balboa Park to Cortez. A full-block park would be developed adjacent to the historic St. Joseph's Church. Residential uses would continue to be emphasized in this neighborhood. In general, mid-sized buildings with more slender profiles than those in the neighboring Civic/Core would be permitted.

Little Italy (Chapter 6.7)

Located in the northwest portion of downtown close to the airport, this neighborhood is well established and not anticipated to change substantially. The Downtown Community Plan would designate a mixed-use center along India Street, where there are already a number of cafes, restaurants, and shops that attract visitors and residents. Residential development would intensify in the southern portion of the neighborhood near Civic/Core. The prevalence of lower-scale buildings and wide mix of uses (including commercial/service uses) would continue in the north. A combination of hotel and office with residential would be anticipated closer to the water, alongside existing industrial and civic uses. Major park space would be offered near the waterfront surrounding the historic County Administration Center.

Convention Center (Chapter 6.8)

This neighborhood would occupy the southeastern corner of downtown and be located adjacent to San Diego Bay and the Marina neighborhood. The overall character of the area would not be anticipated to change substantially, as the majority of the neighborhood is already occupied by the Convention Center, and rail switching yards, and since the area is primarily under the jurisdiction of the Port District. The Downtown Community Plan would encourage improved access to the water and bayside promenade. A diversity of uses, such as office, residential, light industrial, retail, and social services, would be allowed in the inland portion of the neighborhood at low intensities, other areas would be expected to remain industrial in character.

4.5.3 TRANSPORTATION AND PUBLIC FACILITIES (PART 3)

4.5.3.1 Transportation (Chapter 7)

The Transportation chapter of the Downtown Community Plan focuses on five elements: the street system, pedestrian and bicycle movement, the public transit system, parking, and transportation demand management. The Downtown Community Plan anticipates that the increase in population and employment downtown will generate more automobile trips downtown. At the same time, the Downtown Community Plan would promote alternative transportation, seek to make transit, carpooling, and walking more attractive, and designate a Neighborhood Center and park within a ten-minute walking distance of the vast majority of downtown residents. A well-managed mixture of pedestrians, cars, and transit would be achieved through the development of a mixed use system and well designed streets.

Street System (Chapter 7.1)

The Downtown Community Plan proposes improvements to promote a comfortable and safe environment for pedestrians, bicycles, and transit. Modifications to the street system would be designed to improve connectivity, activate Neighborhood Centers, expand connections to adjacent neighborhoods, improve pedestrian safety, re-establish water views, and provide for transit. Such changes would include:

- Reconfigure streets (where feasible) in residential neighborhoods and in Neighborhood Centers to accommodate diagonal parking, widen sidewalks, and improve pedestrian safety;
- Improve Broadway to be consistent with its role as downtown's principal boulevard, and improvements to C Street;
- Reinforce the role of Park Boulevard as a pedestrian corridor and green link;
- Extension of B Street to open up the Civic Center, cultivate the public realm, and increase accessibility and connection;
- Evaluate the feasibility of removing~~Remove~~ the Cedar Street off-ramp, and switching Cedar Street from one-to two-way traffic to improve pedestrian safety and re-establish connectivity between Balboa Park, Cortez, Little Italy, and the waterfront;

- Re-establish the street grid, extend streets in waterfront areas and across bus yards when redevelopment occurs, and extend Eighth Avenue across I-5 in conjunction with freeway lid construction; and
- Allow for the closure of E and Union Street to vehicle traffic for the expansion of the federal courts. Retain pedestrian access.

Pedestrian and Bicycle Movement (Chapter 7.2)

To facilitate pedestrian and bicycle movement, the Downtown Community Plan designates pedestrian priority zones and creates a system of bikeways. The walking and bicycle system would provide links within the area and surrounding neighborhoods (Goal 7.2-G-1). The proposed Plan would reduce and control speeds on all freeway couplets while optimizing traffic flow during peak hours (Policy 7.2-P-2). Within pedestrian priority zones, traffic signal walk times would be lengthened and streetscape would be designed to encourage pedestrian use (e.g. sidewalk widening and bulbouts) (Policy 7.2-P-4). Bike racks and locking systems would be required in all residential projects, multi-tenant retail and office projects, and government and institutional uses (Policy 7.2-P-3).

Transit System (Chapter 7.3)

The Downtown Community Plan seeks to accommodate residential and office growth ~~with more and better transit~~ by integrating with planned transit service. Anticipated system improvements include trolley service and capacity upgrades and Bus Rapid Transit service. Local shuttle service could fill the need for quick, convenient transportation between various downtown locations and Balboa Park. In addition, the Downtown Community Plan would encourage transit use by designating the highest building intensities around the trolley route “L” pattern.

Parking (Chapter 7.4)

The Downtown Community Plan seeks to provide an adequate supply of parking to serve a growing downtown, while avoiding excessive supplies that discourage transit ridership. The proposed Plan would accomplish this by maintaining on-site standards for all uses. Shared parking would be emphasized, such as the development of parking facilities that serve multiple uses, locating parking facilities under new parks (Policy 7.4-P-2), and managing metered street parking to correspond with daily activity patterns (Policy 7.4-P-7).

Transportation Demand Management (Chapter 7.5)

Transportation Demand Management (TDM) is a method of providing alternatives to single occupancy vehicular transportation. TDM reduces the number of vehicles using the street network at a given time and reduces the need for parking. The Downtown Community Plan contains TDM approaches through Policy 7.5-P-1 which would promote the following:

- Ridshare and carpool in all levels of government with offices and facilities downtown as well as other major downtown employers;
- Make available designated preferential, conveniently located car/vanpool parking areas;

- Provide transit reimbursement and other benefits to other users of non-motorized travel;
- Establish a car/van-pool matching service;
- Continue SANDAG's guaranteed ride home for workers who carpool;
- Work with public and private entities to encourage car share programs in downtown; and
- Provide flextime and telecommuting opportunities to employees.

4.5.3.2 Public Facilities and Amenities (Chapter 8)

This chapter of the Downtown Community Plan focuses on educational facilities, police and fire emergency facilities, community facilities, civic center, and libraries.

Educational Facilities (Chapter 8.1)

The Downtown Community Plan anticipates the growth and expansion of higher learning facilities downtown. They would most likely have a special focus such as business, arts, communications, or real estate. In addition, satellites of regional universities would be encouraged to develop downtown. For school-aged children, the Downtown Community Plan would promote the development of urban model public schools and charter schools to augment existing facilities.

Police and Fire Facilities (Chapter 8.2)

The Downtown Community Plan anticipates a higher demand for police and fire services as a result of downtown growth. The proposed Plan would alleviate pressure on these services through the consideration of public safety in the design of new development and public spaces (Goal 8.2-G-3) and the siting of new police and fire facilities in mixed-use development projects (Policy 8.2-P-3). Development Impact Fees would be collected for all development projects to help pay for the needed fire facilities (Policy 8.2-P-1).

Other Community Facilities (Chapter 8.3)

Included in the category Other Community Facilities are houses of worship, child care, space for professional organizations, neighborhood groups, community meetings, and special events. The Downtown Community Plan would encourage a diversity of community facilities in downtown neighborhoods (8.3-G-1) and direct them into Neighborhood Centers (Policy 8.3-P-1). To encourage their development, incentives would be instituted, such as exempting community facility space from FAR calculations in mixed use development (Policy 8.3-P-2).

Civic Center (Chapter 8.4)

The Downtown Community Plan encourages the redevelopment of the Civic Center to become a regional center of public activity that is integrated with downtown, contains inspiring architecture and open spaces, and extends the street grid.

Libraries (Chapter 8.5)

The new Main Library in the proposed Ballpark sub-district would become the primary library serving downtown. The Downtown Community Plan would encourage its use through integrating it with downtown connections and activity nodes (Goal 8.5-G-2). Other, special topic libraries could be located primarily in the Civic/Core and Columbia neighborhoods, Neighborhood Centers, near City College, and around the Main Library (Policy 8.5-P-1).

4.5.3.3 Historic Preservation (Chapter 9)

The preservation and rehabilitation of historic structures downtown is regulated on the National, State, and local levels. The Downtown Community Plan would reinforce these regulations by maintaining review procedures for projects potentially affecting National Register, State Register, and Local Register properties and districts (Policy 9.1-P-1), offering incentives to encourage rehabilitation and reuse of historic properties, such as floor area bonuses and exceptions to parking requirements (Policy 9.1-P-2), and assisting in the rehabilitation of historic properties through on-going programs (Policy 9.1-P-3). Interpretive programs, such as walking and audio tours, permanent displays and signage, public art programs, and special events would also be encouraged to preserve historical knowledge and heritage (Policy 9.2-P-4). Adaptive reuse of intact buildings (designated or not) and/or significant elements, as a cultural or sustainable goal would be promoted (Policy 9.2-P-3).

4.5.4 COMMUNITY DEVELOPMENT (PART 4)

4.5.4.1 Arts and Culture (Chapter 10)

Currently, public art downtown is provided by a citywide public art program. The program requires private non-residential development (with valuation equal to or above \$5,000,000) to incorporate on-site public art worth at least one percent of the valuation. Developers also have the option to pay an in-lieu fee of one-half of one percent to a public art development fund to be applied to creation of new downtown public art. ~~The benefits of this program are largely limited to significant hotel and office development in the Civic/Core and Columbia neighborhoods.~~

The Downtown Community Plan would seek to integrate public art in all downtown neighborhoods (Goal 10.1-G-2). In addition, the proposed Plan would strengthen the presence of public art in public parks and plazas, gateways, and designated streets (Policy 10.1-P-1). To ensure the longevity of arts programs downtown, the Downtown Community Plan would include goals and policies to retain and develop new arts facilities.

4.5.4.2 Economic Development (Chapter 11)

The Downtown Community Plan's economic development strategy would provide a framework for ensuring downtown's long-term regional economic competitiveness. The strategy would seek to attract new businesses, build on existing strengths, and nurture start-ups in new market segments. It would also outline measures to retain and expand existing businesses, including smaller establishments serving residential areas. The Downtown Community Plan would accomplish this strategy by including an "employment required" overlay on the land use plan. This would ensure

that employment-oriented development is built. The employment required overlay would include sites centrally located in downtown, adjacent to existing businesses and civic uses, and near regional and local transit.

4.5.4.3 Health and Human Services (Chapter 12)

Social service facilities downtown are operated by State and local agencies and private non-profit organizations. They include family/individual counseling, homeless shelters, childcare and after school programs, senior services, emergency/outreach services, community and youth activity centers, employment services, and domestic violence services. The Downtown Community Plan would integrate social service facilities into neighborhoods, allowing service accessibility where people live and work. This type of integration, smaller full-service facilities that blend in with neighborhoods, generate fewer off-site impacts such as camping, loitering, public drunkenness, migrations from facility to facility, outdoor toileting, panhandling, and criminal behavior. To avoid excessive impacts to any one neighborhood, clusters of facilities would be discouraged. In addition, the transition from single-service facilities into 24-hour providers of housing, meals, and services would be encouraged (Goal 12.2-G-2). The Downtown Community Plan would also establish a policy to work with human service agency providers, the City and the County to expand the range of services for people who are homeless or at risk of homelessness, and require all new or relocated facilities to provide such services (Policy 12.3-P-1). Policy 12.3-P-2 would allow social services within very-low and low-income housing projects, wherever possible.

4.5.4.4 Health & Safety (Chapter 13)

This Health and Safety chapter of the Downtown Community Plan focuses on reducing or avoiding risks associated with geologic and seismic hazards, hazardous materials, airport influence, and noise.

Geologic and Seismic Hazards (Chapter 13.1)

Regional and local seismic faults with potential for earthquakes pose health and safety risks and could result in property damage. Various regulations enforced by the State and local agencies are intended to minimize earthquake-related risks for new and existing development. These include the Uniform Building Code, City of San Diego Ordinance 18451 (providing minimum standards for structural seismic resistance in un-reinforced masonry buildings), City of San Diego Fault and Liquefaction Zones, and the Alquist-Priolo Zone Act. The Downtown Community Plan would further seek to minimize risks related to earthquakes by creating an open space network on local faults where building would be restricted to the greatest degree possible (Goal 13.1-G-2 and Policy 13.1-P-3). In addition, the Downtown Community Plan would ensure that all seismic-safety development requirements are implemented (Policy 13.1-P-1).

Hazardous Materials (Chapter 13.2)

The Downtown Community Plan anticipates the encounter of soil and/or water contamination in certain areas. A portion of older buildings subject to demolition would likely contain asbestos and lead-based paint, materials which pose health concerns. In addition to existing regulations, the Downtown Community Plan includes goals and policies to minimize hazardous material exposure (Goal 13.2-G-1) and require documentation of hazardous materials investigation and remediation

programs during review of development projects when needed to protect public health and safety (Policy 13.2-P-1). Policy 13.2-P-2 would promote coordination of remediation of sites, as necessary and feasible. Onsite remediation of contaminated soil would be discouraged if it would result in nuisance impacts (Policy 13.2-P-3)

Airport Influence (Chapter 13.3)

The proximity of the San Diego International Airport (SDIA) represents potential risks to public health with respect to rare crashes during approach or take-off and noise generated by jet planes and airport activities. The Downtown Community Plan would be consistent with the proposed SDIA Airport Land Use Compatibility Plan (ALUCP)~~CLUP~~ and the San Diego Municipal Code. Policy 13.3-P-1 would restrict building heights, building intensity, and noise-sensitive land uses downtown consistent with the ~~CLUP~~ALUCP and Municipal Code.

Noise (Chapter 13.4)

Transportation systems such as the railroad, freeway and airport are the principal sources of high noise levels downtown. In addition, increasing mixed-use intensities downtown result in the juxtaposition of residents and more active, noisy uses. The Downtown Community Plan would include a policy which would seek establishment of quiet zones and enforce ban on sounding of horns and whistles (Policy 13.4-P-2); implementation of this policy would be subject to the approval of the California Public Utilities Commission. Construction techniques that mitigate interior noise near freeways would be required according to Policy 13.4-P-3. In addition, night clubs, music halls, live-music performance venues, and other sources of noise would go through a discretionary review process to ensure noise compatibility with surrounding uses (Policy 13.4-P-4).

4.5.4.5 Planning Process and Implementation (Chapter 14)

Chapter 14 addresses the implementation of the Community Plan, describing the process for permitting changes to the plan and reviewing the document periodically in order to ensure successful performance and smooth continuing operation.

4.6 REDEVELOPMENT PLAN

Two redevelopment plans, the Horton Plaza Redevelopment Plan and the Centre City Redevelopment Plan, currently exist downtown pursuant to California Community Redevelopment Law (California Health and Safety Code § 33000 et seq.). The combined redevelopment project areas generally comprise the proposed Downtown Community Plan area.

In order to reflect the changes contained in the Downtown Community Plan, the Redevelopment Plan for the Centre City Redevelopment Project ~~Area~~ would be amended for consistency. The primary revisions proposed result from replacing descriptions of land use districts to be consistent with the Downtown Community Plan, and to revise estimates of residential population and number of residential units in the Redevelopment Area.

4.7 PLANNED DISTRICT ORDINANCE

The Centre City Planned District Ordinance (PDO) that applies within the Downtown Community Plan area would be revised. The Centre City PDO is the primary regulatory document that would implement the goals and policies identified in the Downtown Community Plan. PDO regulations with respect to land use, density and intensity, building massing, sun access, architectural design, landscaping, streetscaping, lighting, and other development characteristics would be modified to be consistent with the Downtown Community Plan. No changes are proposed to the Gaslamp and Marina Planned District Ordinances.

4.8 LAND DEVELOPMENT CODE

The Airport Approach Overlay Zone of the City of San Diego's Municipal Code will be amended to eliminate building height limitations from a runway at Lindbergh Field which has been decommissioned. As a result, City Map C-842 will be amended to remove the height limit contours associated with the decommissioned Runway 13-31. This change was requested by the San Diego County Regional Airport Authority as part of its review of the proposed Community Plan for consistency with Airport Land Use Compatibility Plan (ALUCP) for San Diego International Airport – Lindbergh Field.

The elimination of the building height limitations imposed by Runway 13-31 would not change the land use projections used in the following EIR analysis. Recognizing that the runway had already been decommissioned, the land use projections assumed there would be no building height limitations in the area to be formally eliminated with the amendment of Map C-842.

4.89 DISCRETIONARY ACTIONS

Adoption and implementation of the proposed Plans and Ordinance will require a series of discretionary actions. These actions and the agency responsible for them are identified in Table 4.8-1.

This Environmental Impact Report will be used by the Centre City Development Corporation and the City of San Diego for discretionary actions associated with subsequent development and other activities within the Downtown Community Plan Area which require CEQA review. As discussed in Chapter 1.0, a Secondary Study would be performed for subsequent activities to determine if the EIR adequately addresses the potential impacts of the specific activity. If the Secondary Study determines that the EIR does adequately cover the activity, no further review will be required and the EIR will be referenced in approving required discretionary actions. Such actions are anticipated to include but not be limited to the following:

- Centre City, Marina and Gaslamp Development Permits;
- Neighborhood Use Permits;
- Conditional Use Permits;

- Tentative Maps;
- Demolition Permits;
- Coastal Development Permits:
- Site Development Permits;
- Grading Permits; and/or
- Tentative Maps.

**TABLE 4.8-1
Discretionary Actions**

ACTION	AGENCY	PURPOSE
<u>Proposed 10th Amendment to the Centre City Redevelopment Plan Amendment</u>	City of San Diego Redevelopment Agency	Amend Plan to accommodate changes contained in the Downtown Community Plan
<u>Centre City Proposed Downtown Community Plan Amendment</u>	City of San Diego	Amend the Centre City Community Plan to incorporate the provisions of the proposed Community Plan
Local Coastal Plan <u>Program</u> Certification	California Coastal Commission	Allow the Downtown Community Plan along with the Marina and Centre City Planned District Ordinances to serve as the Local Coastal Plan <u>Program</u> for the downtown area located within the California Coastal Zone
<u>Amend Land Development Code</u>	<u>City of San Diego</u>	<u>Implement Airport Authority request to reflect decommissioning of Runway 13-31 and the fact that associated building height limitations are no longer necessary.</u>
<u>Proposed Centre City Planned District Ordinance Amendment</u>	City of San Diego	Allow regulations contained in the PDO to be applied to development within <u>a portion of</u> the Downtown Community Plan Area

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CHAPTER 5.0

ENVIRONMENTAL IMPACTS

5.1 LAND USE AND PLANNING

5.1.1 EXISTING CONDITIONS

5.1.1.1 General Land Use Types in Downtown

The Downtown Community Plan area (“downtown planning area”) encompasses a variety of land uses including public/institutional, commercial and office, residential, industrial, open space, vacant land, and other uses (Figure 5.1-1). The following discussion identifies and defines the major land uses found downtown (refer to Table 4.1-1).

Residential Use

There are approximately 14,600 residential units in downtown. The majority of residential uses downtown are multi-family units (e.g., apartments, condominiums, and townhouses), while a very small proportion are detached, single-family residences. This category also includes mixed-use buildings that contain residential uses and street-level commercial uses. The existing Cortez Hill and Marina neighborhoods emphasize residential uses. A number of mixed-use residential buildings are concentrated in East Village and Little Italy.

Retail Use

Approximately 2.66 million square feet of retail exists downtown. This category includes specialty shopping areas (such as tourist or “themed” shopping centers), retail stores, restaurants, and business services. The major commercial retail centers downtown are Horton Plaza, Gaslamp Quarter, and Seaport Village.

Office Use

Approximately 9.47 million square feet of private office use occurs downtown. Office uses are currently concentrated in the Core and Columbia neighborhoods.

Civic Office

Civic office comprises approximately 3.7 million square feet and consists primarily of the Federal, State, City and County offices.

Hotel Use

Approximately 8,800 hotel rooms occur downtown. Hotels are concentrated in Marina along the waterfront and in the Core.

Culture and Education

Approximately 1.5 million square feet of culture (e.g. museums) and education uses exist downtown. The major education uses include San Diego City College, San Diego High School, Garfield High School and Washington Elementary campuses, along with a number of charter schools.

Industrial

Square footage estimates of existing industrial uses are not available. However, industrial uses cover approximately 77 acres of downtown. Uses include various smaller operations in the East Village.

Other

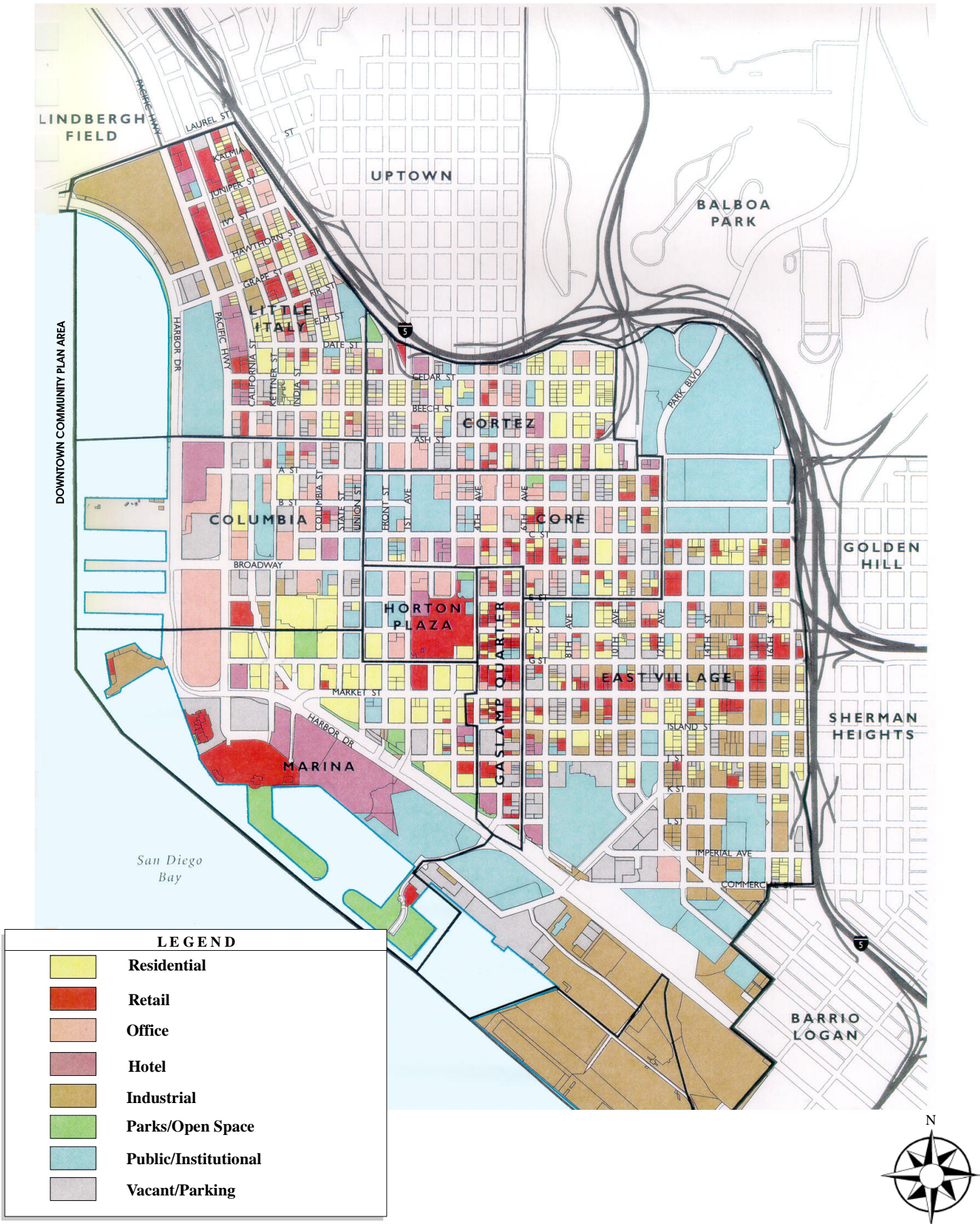
Approximately 2.2 million square feet of downtown space is dedicated to other uses. A major portion of this square footage is dedicated to the San Diego Convention Center and San Diego Padres Ballpark.

5.1.1.2 Surrounding Uses

Land uses surrounding the downtown planning area are varied. Bordering the downtown planning area to the northeast is Balboa Park, a 1,200-acre urban park that provides passive and active recreational opportunities as well as cultural and entertainment attractions. Balboa Park is home to the San Diego Zoo and many museums housed in highly ornate Spanish Colonial Revival buildings.

To the northwest of the planning area are the neighborhoods of Uptown which include Hillcrest, Middletown, Mission Hills, Park West, Banker's Hill, and half of University Heights. The Uptown neighborhoods are predominantly residential in nature, with well-developed local commercial uses, small-scale offices (often in older converted homes), and significant medical facilities, including the UCSD and Scripps Mercy hospitals. Open space is limited, however, proximity to Balboa Park provides the Uptown neighborhoods with recreational opportunities.

To the east of the downtown planning area are the residential neighborhoods of Golden Hill, Sherman Heights, and Logan Heights. Golden Hill is bounded by Highway 94 to the south, and is one of San Diego's first residential neighborhoods. The neighborhood contains mainly single-family residences, although many lots have been converted to multi-family apartment buildings. Commercial uses are concentrated along 25th Street with a small commercial core at 25th Street and Broadway. Between Highway 94 and I-5 are the Sherman Heights and Logan Heights neighborhoods. These neighborhoods have a substantial number of buildings dating back to the late 1800's and early 1900's.



Source: Downtown Community Plan Update Working Paper # 6, 2003



Existing Downtown Land Use _____ Figure 5.1-1

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Directly southeast of the planning area, between I-5 and San Diego Bay, is Barrio Logan. This neighborhood exhibits a mix of uses including: residential, commercial business, heavy and light industrial uses, public/institutional, and major maritime industries. Often incompatible uses, such as heavy industrial and single-family residential, are found adjacent to one another.

West of the planning area, across the San Diego Bay, is the peninsular City of Coronado. The city is accessed by a 2.3-mile bridge that begins off of I-5 in Barrio Logan, south of the downtown planning area boundary. State Highway 75 provides secondary access from the south near Imperial Beach. The City of Coronado encompasses approximately 7.7 square miles and is comprised of two general areas: the Village and the Silver Strand. The U.S. Navy occupies several areas on the Silver Strand, which connects Coronado to Imperial Beach, including Naval Air Station North Island, the U.S. Naval Amphibious Base, and the U.S. Naval Communication Station. The Village (or downtown area) is a beach and tourist town, with emphasis on shopping, hotel and restaurant uses. The Village is surrounded by residential neighborhoods and the historic Hotel Del Coronado.

5.1.1.4 Relevant Plans, Ordinances, and Policies

Downtown land use is regulated primarily by CCDC who has planning jurisdiction over the downtown area. Other government agencies also play a role in downtown's land use planning (refer to Figure 4.4-1 for jurisdictional boundaries). They include the following:

- The SDUPD has primary planning jurisdiction, regulatory duties and proprietary rights over tidelands within the planning area;
- The San Diego County Regional Airport Authority (SDCRAA) acts as the Airport Land Use Commission for the San Diego International Airport, affecting downtown land use in areas within the Airport Influence Area;
- The County of San Diego has planning jurisdiction over its own property in the case of public development;
- The U.S. Navy controls a large developed parcel adjacent to the waterfront (the Broadway Complex), ~~an adjacent pier,~~ and an office building on Pacific Highway; and,
- The California Coastal Commission (CCC) would normally have jurisdiction over all lands within the Coastal Zone; however, the CCC delegated its coastal zone authority to the City of San Diego and the SDUPD through certification of the Local Coastal Program and Port Master Plan. The CCC has retained jurisdiction over the County Administration Center land.

The following section provides an overview of major planning and development regulatory documents for the downtown planning area. These are discussed in the following paragraphs.

Downtown-Based Plans

City of San Diego Progress Guide and General Plan

The City of San Diego's Progress Guide and General Plan is a comprehensive long-term plan for the physical development of the City of San Diego. The General Plan considers downtown as an urbanized area that is the focus of metropolitan San Diego. The objectives for downtown include attracting the most intensive and varied land use, such as office/administrative, financial, residential,

and entertainment, and strengthening the viability of downtown through renewal, redevelopment, and new construction.

Specifically, the General Plan's Strategic Framework Element, encourages the further intensification of downtown to increase its role as a Regional Center. This would be accomplished by maintaining and enhancing its role as the pre-eminent business center in the region and developing as a major urban residential center with the largest concentration of high density multifamily housing in the region.

Overall, the General Plan provides regional goals and policies that do not relate to specific development proposals. The Centre City Community Plan, a more specific planning document (discussed below), is the applicable Land Use Element policy of the City's General Plan for downtown.

Centre City Community Plan

The major policies and objectives related directly to future development in downtown San Diego are outlined in the Centre City Community Plan. The existing Centre City Community Plan would be replaced by adoption of the proposed Downtown Community Plan.

The overarching goal of the 1992 Community Plan was to create a downtown that is:

- An urban resort;
- Focused on the waterfront;
- Accessible from throughout the region;
- Made up of different neighborhoods;
- Designed for the pedestrian;
- Connected to Balboa Park and San Diego Bay;
- In touch with its past; and
- Responsive to its citizens.

Other key goals and objectives include:

- Stimulate mixed-office, commercial, and residential development adjacent to the core and along transit corridors to provide support services for both businesses and residents and to serve as a buffer for residential neighborhoods.
- Preserve the identity of existing special districts and neighborhoods like Little Italy, Chinese Thematic Historic District, the Gaslamp Quarter, and the Arts District, and promote new ones.
- Stimulate residential development downtown, especially in East Village, Little Italy and Cortez Hill.
- Direct a larger proportion of San Diego's regional housing growth to downtown.

- Encourage a variety of housing, including high-rise, mid-rise, and mixed-use; condominiums to buy and apartments to rent; units for singles, couples, and for families with appropriate amenities for each (for instance, child care facilities for families).
- Aim for increased use of mass transit, especially by daily commuters, with less reliance on automobiles and long-term downtown parking.
- Provide a continuous pedestrian-oriented circulation system which connects offices in the Core to the trolleys and buses, parking structures and major retail and public activity areas.
- Protect views of the bay by establishing view corridors which accentuate key public rights-of-way (streets and sidewalks, both existing and proposed) with appropriate zoning, setbacks and design standards. Further, protect major bay views from key freeway points and similar locations by clustering of tall buildings, slender towers, proper building orientation, and floor area restrictions and height limits when necessary.
- Provide a system of small open spaces throughout downtown –pocket parks, plazas, fountains, landscaped streets – to supplement the large open spaces of the waterfront to Balboa Park, to link the various downtown districts and to provide focal points for the various neighborhoods.
- Design and locate human service facilities in a manner which assures easy access for consumers and promotes compatibility with the surrounding neighborhood environment.
- Encourage the location of additional colleges, universities and professional schools in Centre City.

Redevelopment Plans

Two redevelopment projects have been adopted in downtown pursuant to California Redevelopment Law. The Horton Plaza Redevelopment Project was adopted in 1972, with boundaries coterminous with the Horton Plaza neighborhood boundaries and including various properties along B Street. The Redevelopment Plan for the Centre City Redevelopment Project was adopted in 1992. This action merged the Columbia, Marina, and Gaslamp redevelopment projects and expanded the project boundaries to include East Village (then Centre City East), Little Italy (then Harborview), and Cortez Hill. The combined redevelopment project areas occupy the entire downtown area. Together, they comprise the Centre City Community Plan area.

The objectives of the Redevelopment Plans for Horton Plaza and Centre City include:

- Eliminate existing blighted conditions, including small and irregular lots, incompatible land uses, obsolete dilapidated buildings, and substandard and deteriorated public improvements;
- Rehabilitate buildings and preserve architecturally significant historic sites;
- Plan, redesign, and develop areas which are stagnant and underutilized;
- Participate with owners and tenants in the revitalization of their properties; and
- Provide low and moderate income housing.

The Redevelopment Plans establish a process, structure and method to finance redevelopment programs. They enable tax-increment financing, selective eminent domain, and the application of

Redevelopment Agency resources toward the elimination of blight. Redevelopment Agency activities in the project areas include cooperation with owner participants, property rehabilitation, property acquisition, relocation of tenants and owners, demolition of structures, construction of public improvements, land disposition (lease or sale) for private development, continuing land use controls, and assistance in the provision of financing for all of the above.

The Redevelopment Plans divide the downtown area into 10 land use districts (Horton Plaza and nine in the Centre City Redevelopment Project) and define the types of development that are allowed within each district. However, the range of land uses emphasized in each district is also subject to and governed by the land use designations specified in the Centre City Community Plan and the three Downtown Planned District Ordinances. As a result, the substance and intent of the land use regulations must be consistent.

Planned District Ordinances

Three Planned District Ordinances (PDOs) apply to downtown: the Centre City PDO, Gaslamp Quarter PDO, and the Marina Urban Design Plan and PDO. The Gaslamp Quarter and Marina PDOs apply to their respective districts and the Centre City PDO applies to all other districts within the planning area. The PDOs contain regulations and controls pertaining to land uses, development densities/intensities, architectural design, building massing, landscaping, lighting, and other development characteristics. The purpose of the PDOs is to implement the policies of the Centre City Community Plan and redevelopment plans.

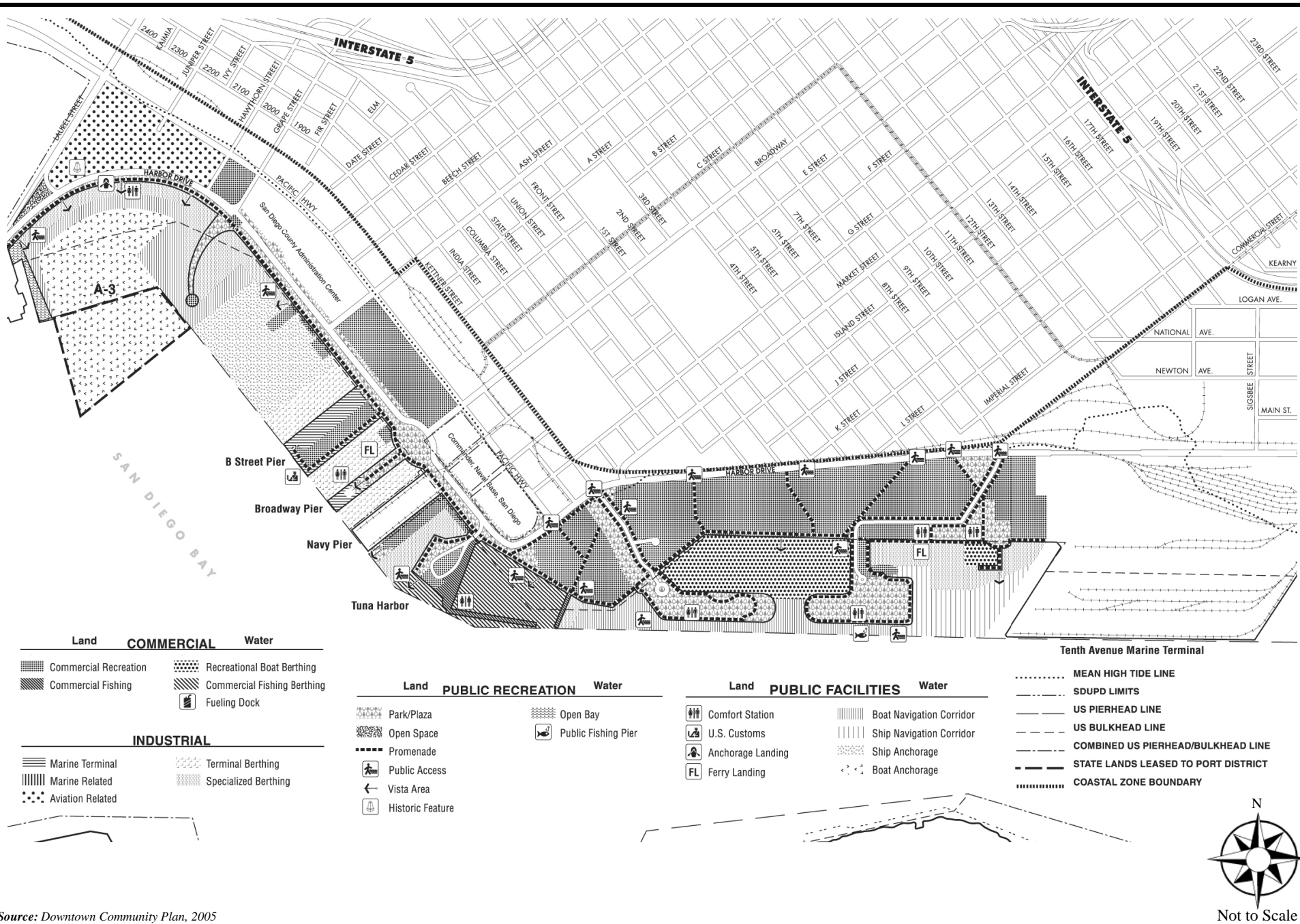
With the exception of development occurring on Port lands or other property held by a public agency with primary jurisdiction (refer to Chapter 4.4 and Figure 4.4-1), any private development occurring on land owned by the Navy or County must comply with the regulations set forth in the appropriate PDO. The PDOs supersede the conventional citywide zoning in the Land Development Code. For those development matters where the PDOs are silent, San Diego City zoning applies.

San Diego Unified Port District

Master Plan

Downtown's waterfront, from San Diego Bay to the historic mean high tide line is under the jurisdiction of the San Diego Unified Port District. The Port District's regulatory duties for the waterfront include development, maintenance, control, regulation, and management of the harbor of San Diego, and promotion of commerce, navigation, fisheries, and recreation. In addition, the Port may exercise its authority to protect, preserve, and enhance physical access, natural resources, and water quality for the Bay.

Development along the waterfront is guided by the Port Master Plan, which was originally certified by the California Coastal Commission in 1981. The Port Master Plan divides tidelands around San Diego Bay into ten Planning Districts. Each Planning District has a corresponding Precise Plan. The downtown tidelands are included in Planning District 3, named Centre City Embarcadero (Figure 5.1-2). The Precise Plan for Planning District 3 allows the Port to lease land under its jurisdiction. Under the Precise Plan, development of commercial fishing and recreation uses; aviation and marine related industrial uses; parks, plazas, promenades, and open space; public facilities; and commercial uses are allowed in certain areas. However, residential uses in all tideland



Source: Downtown Community Plan, 2005



Port Master Plan - Centre City Embarcadero Figure 5.1-2

areas are excluded. Development on tidelands may also be subject to various permits from government agencies such as the Army Corps of Engineers, California Coastal Commission, U.S. Fish and Wildlife Service, and California Department of Fish and Game.

The Centre City Embarcadero Precise Plan 3 includes a Precise Plan Concept. This is similar to the goals in a general plan. Precise Plan 3 states that, “the basic concept of the redevelopment of the Embarcadero is to create a unified waterfront, both visually and physically, which creates an overall sense of place.” Important to the Precise Plan is that the Embarcadero become a pedestrian spine lined with commercial and recreational uses. At the same time, industrial aviation and marine uses are designated near the airport and the piers. While pedestrian and public-oriented uses are emphasized, the Precise Plan makes it clear that the Embarcadero is intensively used by many people performing a variety of activities, including those associated with the fisheries, marine transport, and shipping industries.

In addition to the Port Master Plan (PMP), the Port directs two redevelopment projects for the southern downtown tidelands. They are the South Embarcadero Redevelopment Programs 1 and 2. In addition to the PMP, development for the North Embarcadero is guided by the North Embarcadero Alliance Visionary Plan, which was originally the result of a cooperative effort by the Port, CCDC, City of San Diego, County of San Diego, and the United States Navy. Design and implementation of the Plan is now being pursued by the Port and CCDC acting under a Joint Powers Authority (JPA).

South Embarcadero Redevelopment Program 1 (Program 1)

Certified by the Port in 1998, the Program 1 redevelopment area encompasses the South Embarcadero waterfront from the G Street Mole to the Tenth Avenue Marine Terminal between Harbor Drive and San Diego Bay. The southernmost portion of the South Embarcadero project area includes the Fifth Avenue Landing, located adjacent to the San Diego Convention Center Expansion Project and the Tenth Avenue Marine Terminal. These two sites were evaluated in greater detail under the South Embarcadero Redevelopment Program 2.

Program 1 includes 33 acres and involves the redevelopment of four land components, which are described as the Seaport Village Expansion Site, Park Expansion Site, Hyatt Expansion Site, and Marriott Expansion Site. The characteristics of each expansion site are described below.

- **Seaport Village Expansion Site.** This element of Program 1 includes the development of 203,280 square feet of entertainment-oriented/specialty retail. Retail entertainment, retail shops, fast food and various restaurant facilities account for 183,280 square feet and retaining the Chesapeake Fish Company in its existing location accounts for the balance of 20,000 square feet.

The Seaport Village Expansion also adds small arcades, courtyards, and walkways to focus pedestrian circulation into and through the area; extending “Central Park” through Seaport Village; relocating a carousel to a portion of the 2.3-acre park site; and creating an additional 1.8 acres of park space.

- **Park Expansion Site.** The approximate 4.1-acre Park Expansion Site, located on the eastern part of the Old Police Station site and parts of Seaport Village and its parking lot, is intended to provide visual and physical linkage to the waterfront from Harbor Drive to the shoreline.
- **Hyatt Expansion Site.** This element of Program 1 includes the expansion of the Hyatt Hotel on Harbor Drive by adding a 448-foot-high, 810-room hotel tower; 80,100 square feet of ballroom and meeting space, and connecting the two hotel towers with a six-story structure.
- **Marriott Expansion Site.** This element includes building a third 600-room hotel tower approximately 398 feet high; constructing 45,000 square feet of retail along the bayfront promenade; improving access between the Marriott east tower and the Convention Center; and, widening the Hyatt/Marriott walkway.

South Embarcadero Redevelopment Program 2 (Program 2)

Program 2 encompasses 27 acres and is located between the San Diego Convention Center and the Tenth Avenue Marine Terminal and is bounded by Convention Center Way/Eighth Avenue to the north, the Tenth Avenue Marine Terminal to the southeast, and San Diego Bay to the west. Program 2 involves the development of a 1200-room “Convention Headquarters” Hotel on the former Campbell Industries Shipyard and a 250-room boutique hotel on the Fifth Avenue Landing.

Other Downtown-Based Plans

North Embarcadero Alliance Visionary Plan

The North Embarcadero extends from Laurel Street south to Market Street, and from the railroad tracks along California Street to the San Diego Bay. The North Embarcadero Alliance Visionary Plan generally establishes the location and character of public plazas, parks, piers, and other public amenities; the circulation pattern and parking strategy to support development and public access; and the location, intensity, and character of commercial and residential development. The Plan was unique in that it is the product of a joint planning venture among five agencies with ownership of property or land use planning authority in the area. The Plan served as a framework for amending each Alliance member’s existing plans, policies, guidelines, and standards to implement appropriate aspects of the Visionary Plan.

In addition, the Plan contains a substantial linear esplanade park on the urban waterfront with public art, street furniture, public spaces, expansive Bay views and public parking. The Plan along the waterfront proposes major parks. Pacific Highway would be enhanced to a “grand boulevard” and North Harbor Drive would serve waterfront public access, water-dependent, and Embarcadero commercial and recreational uses. Finally, North Harbor Drive, Broadway, Ash Street, and Grape Street are envisioned as active pedestrian linkages to the Bay from the upland areas of downtown.

The North Embarcadero Alliance Visionary Plan includes 12 plan goals oriented toward establishing the North Embarcadero as a “public precinct” and downtown’s “front porch.” The plan encourages development along the bayfront that creates an active, vibrant, accessible, economically and socially vital area; preserves and celebrates the area’s maritime uses; maximizes views of and to the Bay; provides public access and open space amenity; enhances connections between the North Embarcadero and adjacent neighborhoods; and, preserves the environmental integrity of the Bay.

Unlike the Precise Plan 3 Centre City Embarcadero of the Port Master Plan, the North Embarcadero Alliance Visionary Plan explicitly allows for residential projects in areas east of Port Tidelands in Policy LU-1.

Regional Plans

Regional Comprehensive Plan

SANDAG's Regional Comprehensive Plan (RCP) is a long-range planning document that encourages local jurisdictions to address the San Diego region's housing, economic, transportation, environmental and overall quality of life needs. The RCP establishes a planning framework and implementation actions that aim to increase the region's sustainability and encourage "smart growth" (development that promotes alternative transportation use and minimizes environmental impacts).

To encourage regional sustainability and smart growth, the RCP aims to reduce the number of housing units and residents that are expected to be "exported" from the region by 2030. To achieve this, the Plan identifies certain areas in the region as Smart Growth Opportunity Areas. Designation of these opportunity areas is intended to provide guidance to local governments, property owners, and service providers as to where smart growth development should occur from a regional perspective, and encourages local jurisdictions to focus attention on these areas as they update their general plans and redevelopment plans. Once these areas are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure to these areas will be prioritized. The intended effect of this effort is to attract housing units that are anticipated to be exported from the San Diego region to Baja California, Riverside County, Orange County and Imperial County by 2030. The RCP would redirect those housing units to areas within the region that are located along the existing and proposed regional transportation corridors as well as other locations where compact development is appropriate. A portion of this redirected development will occur in areas of vacant land and a portion will occur as redevelopment and infill development in existing communities.

Regional Transportation Plan

The MOBILITY 2030 is the County of San Diego's Regional Transportation Plan (RTP), which is intended to be a blueprint to address the mobility challenges created by the region's growth. It is a long-range plan that contains an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system in the San Diego region. MOBILITY 2030 has seven policy goals which are to improve the mobility, accessibility, reliability, and efficiency of the transportation system, as well as promoting livability of communities, sustainability, and ensuring equity.

California State Implementation Plan

The SIP was adopted by the California ARB and Environmental Protection Agency (EPA) to bring non-attainment air basins into compliance with the National Ambient Air Quality Standards (NAAQS). Due to continued violations of NAAQS standards in the SDAB, the San Diego APCD, in conjunction with SANDAG, prepared a RAQS for its portion of the SIP. The proposed project relates to the SIP through land use and growth assumptions that are incorporated into air quality planning documents.

Water Quality Control Plan for the San Diego Basin

The Regional Water Quality Control Board (RWQCB) adopted a Water Quality Control Plan for the San Diego Basin that recognizes and reflects regional differences in existing water quality, the beneficial uses of the region's ground and surface waters, and local water quality conditions and problems (RWQCB 1994). The plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. The downtown community plan area is included in the 60-square-mile Pueblo San Diego Watershed (Hydrologic Unit Basin No. 908.20). According to the Basin Plan, the beneficial uses of the inland surface waters in the Pueblo San Diego watershed are limited to contact (potential use) and non-contact recreation, warm freshwater habitat, and wildlife habitat. The San Diego Bay receiving water supports an extensive array of beneficial uses, from migration of aquatic organisms to industrial service supply. The beneficial use of groundwater within this basin is for municipal and domestic supply.

The Municipal Storm Water NPDES Permit, issued on February 21, 2001 to the City of San Diego, and other jurisdictions by the RWQCB, requires the development and implementation of storm water regulations addressing storm water pollution issues in development planning and construction associated with private and public development projects. Specifically, private and public development projects are required to include storm water BMPs both during construction, and in the projects permanent design, to reduce pollutants discharged from the project site, to the maximum extent practicable. See Chapter 5.9 for details on water quality.

Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program that addresses multiple species habitat needs and the preservation of native vegetation communities for a 900-square-mile (582,243 acres) area in southwestern San Diego County. The MSCP includes 11 city jurisdictions, portions of the unincorporated County of San Diego, and several special districts. It is one of three subregional habitat planning efforts in San Diego County which contribute to the preservation of regional biodiversity through coordination with other habitat conservation planning efforts throughout southern California. The MSCP is intended to allow local jurisdictions, including the City of San Diego, to maintain land use control and development flexibility by planning a regional preserve system that can meet future public and private project mitigation needs. The downtown planning area is not within a MSCP subregion.

~~Comprehensive Land Use Plan (CLUP)~~Airport Land Use Compatibility Plan (ALCUP) – San Diego International Airport

The purpose of the ~~CLUP~~ALUCP for San Diego International Airport is to ensure compatible land use development on and surrounding the airport. The ~~CLUP~~ALUCP describes the AIA, which is determined by aircraft-generated noise. Within the AIA, all future land uses are reviewed for ~~CLUP~~ALUCP consistency. This process can result in limitations to building height, construction, and use designations. The ~~CLUP~~ALUCP also explains runway protection zones, the Airport Approach Overlay Zone, and aviation easements and noise attenuation efforts intended to correct the incompatibility of some current land uses.

5.1.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinance would result in a significant, adverse environmental impact related to land use if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion LU-A	Conflict or be inconsistent with applicable federal, state, regional or other local agency plans, regulations, or policies;
Significance Criterion LU-B	Result in substantially incompatible land uses;
Significance Criterion LU-C	Physically divide an established community; or
Significance Criterion LU-D	Substantially increase the physical deterioration of existing neighborhood, community or regional parks through excessive use.

5.1.3 ENVIRONMENTAL IMPACTS

5.1.3.1 Conformance With Relevant Plans, Ordinances, and Policies (LU-A)

Downtown-Based Plans

City of San Diego

San Diego Progress Guide and General Plan

The Progress Guide and General Plan for the City of San Diego considers downtown an urbanized area that is the focus of metropolitan San Diego. The goal of new development is to strengthen downtown's vitality. Therefore, an intensity and variety of uses are encouraged. Intended uses include office, administrative, financial, residential, and entertainment uses. The Downtown Community Plan reiterates the goal of the Progress Guide and General Plan and reinforces downtown's role as a regional center. For instance, the aim of the Downtown Community Plan, Land Use and Housing Goal 3.1-G-1 is to "provide a land use and development framework to guide downtown's evolution as a premier regional and global center of commerce, residence, arts, education, and recreation." Furthermore, a variety of uses would be supported by Goal 3.1-G-2, which is to "provide for an overall balance of uses – employment, residential, cultural, government and destination....". Therefore, the proposed Downtown Community Plan conforms to the vision forwarded by the Progress Guide and General Plan for the downtown area.

The proposed land uses would also implement the goals of the Strategic Framework Element which encourages the further intensification of downtown to increase its role as a Regional Center. This would be accomplished by proposed Community Plan which would substantially increase the housing and employment opportunities downtown.

Centre City Community Plan

If adopted, the proposed Downtown Community Plan would replace the existing 1992 Centre City Community Plan. There are no requirements for consistency between the two Plans, although the proposed Downtown Community Plan carries over many of the goals and policies established in the 1992 Centre City Community Plan. A comparison of the 1992 Centre City Community Plan and the proposed Downtown Community Plan is provided in Chapter 10.0, Alternatives.

Redevelopment Plans

The Redevelopment Plan for the Centre City ~~Redevelopment Project Area~~ enables a project area to be established to address conditions of blight, allows the ability to use tax increment, and describes land use districts. The Downtown Community Plan would not affect the boundaries of the project area or the ability to use tax increment. However, in terms of land use, the Downtown Community Plan would potentially be inconsistent with the land use maps contained in the Redevelopment Plan for the Centre City ~~Redevelopment Project Area~~. The Land Use Map in the Centre City Redevelopment Plan divides the downtown area into 10 land use emphasis districts, whose boundaries diverge from the neighborhood boundaries proposed by the Downtown Community Plan. Amendments to the ~~Centre City Redevelopment Plan for the Centre City Project Area~~ are included as part of the proposed Plans and Ordinance to ensure consistency with the proposed Downtown Community Plan. For this reason, implementation of the Downtown Community Plan could not occur without the amended Redevelopment Plan. Therefore, there would be no conflict.

With respect to the Horton Plaza Redevelopment Plan, the proposed Downtown Community Plan would not affect the land use map or propose changes that would affect allowed buildings and dwelling units. It would be consistent with the Horton Plaza Redevelopment Plan. No amendments to the Horton Plaza Redevelopment Plan would be required.

Centre City Planned District Ordinance

The purpose of the Centre City PDO for the downtown area is to implement the policies of the Centre City Community Plan. To be consistent with the new policies of the Downtown Community Plan, the PDO will be revised as part of the proposed Plans and Ordinance. Therefore, there would be no conflict.

San Diego Unified Port District

Port Master Plan

Under the Precise Plan for Planning District 3 in the Port Master Plan, development of commercial fishing and recreation uses; aviation and marine-related industrial uses; parks, plazas, promenades, and open space; public facilities; and commercial uses are allowed in designated areas. This variety and diversity of uses is consistent with the Downtown Community Plan, which envisions the waterfront as an active, pedestrian-oriented zone with offices, hotels, retail shops, and possibly residential buildings built on the lands closest to the Bay. In addition, the Plan suggests a retail center lining Broadway and Harbor Drive that would have maritime oriented shopping and restaurants at the water's edge. Policy 3.1-P-5 would "encourage a maritime – supporting an diverse mix of uses along the waterfront; allow residential uses where not prohibited by State tidelands restrictions." The Downtown Community Plan is consistent with the Port Master Plan.

In the Port Master Plan, residential uses are excluded within the Port's jurisdiction. The Downtown Community Plan does not anticipate residential uses in the South Embarcadero. Therefore, the Precise Plan for Planning District 3 and the Downtown Community Plan would be consistent with one another.

South Embarcadero Redevelopment Program 1 (Program 1)

Program 1 includes 33 acres and involves the redevelopment of four land components, the Seaport Village Expansion Site, Park Expansion Site, Hyatt Expansion Site, and Marriott Expansion Site. The Program 1 redevelopment area is designated Waterfront/Marine by the Downtown Community Plan. This classification permits a range of maritime-related uses, including ocean-related industry, major tourist and local visitor attractions, trade, office, eating and drinking, markets, retail, parking, museum and cultural facilities, and hotel. Program 1 would include the development of major tourist and local visitor attractions, retail, parking, and hotels. Therefore, Program 1 and the Downtown Community Plan would be consistent with one another.

South Embarcadero Redevelopment Program 2 (Program 2)

Program 2 involves the development of a 1,200-room "Convention Headquarters" Hotel on the former Campbell Industries Shipyard and a 250-room boutique hotel on the Fifth Avenue Landing. As with Program 1 discussed above, Program 2 is designated Waterfront/Marine by the Downtown Community Plan. Hotel use is permitted under this land use designation. Therefore, Program 2 and the Downtown Community Plan are consistent with one another.

Other Downtown-Based Plans

North Embarcadero Alliance Visionary Plan

The components of the North Embarcadero Alliance Visionary Plan were incorporated into the Port Master Plan, Centre City Community Plan, and Planned District Ordinances to encourage development along the bayfront that creates an active, vibrant, accessible, economically, and socially vital area; preserves and celebrates the area's maritime uses; maximizes views of and to the Bay; provides public access and open space; enhances connections between the North Embarcadero and adjacent neighborhoods; and, preserves the environmental integrity of the Bay.

The Downtown Community Plan promotes the goals of the North Embarcadero Alliance Visionary Plan. In fact, it explicitly states that, "the Community Plan reinforces these efforts [the public agency collaboration to create the North Embarcadero Alliance Visionary Plan] to transform the waterfront into a world class regional attraction...The waterfront is envisioned as an active, pedestrian-oriented zone with strong connections to downtown neighborhoods." (page 5-21)

Furthermore, the Downtown Community Plan Waterfront Goals (5.5-G-1 through 5.5-G-6) reinforce the vision presented in the North Embarcadero Alliance Visionary Plan for the waterfront. Through Goal 5.5-G-2, which encourages the development of a diversity of land uses, the waterfront would become an active, vibrant, economically and socially vital area. Goal 5.5-G-1 would enable the waterfront to become more accessible to pedestrians and visitors. In addition, Goal 5.5-G-4 would celebrate the area's maritime uses by supporting the development of "people places" that emphasize the waterfront's unique setting.

Finally, the parks, linear esplanade, and open spaces proposed by the North Embarcadero Alliance Visionary Plan are supported by the Downtown Community Plan. Policy 5.5-P-9 of the Downtown Community Plan would “enhance and extend the waterfront open space network, fostering the completion of ongoing and proposed projects including the County Administration Center parks, Broadway Terminus, and North Embarcadero Bayfront Esplanade.” Therefore, the Downtown Community Plan and the North Embarcadero Alliance Visionary Plan are consistent with one another.

Regional Plans

Regional Comprehensive Plan

The proposed Plans and Ordinance would be consistent with the goals of the Regional Comprehensive Plan. The Downtown Community Plan’s neighborhood concept would result in pedestrian-oriented and -scaled neighborhoods, each focused on a mixed-use center and a park. The mixed-use center would be located within a relatively short walking distance of employment and housing, with a goal of making neighborhood amenities accessible without the use of a car. In addition, smart growth would be achieved with the proposed increase in intensity of uses. Downtown would maximize its infill development potential by encouraging multi-story residential, office, and mixed uses in appropriate areas, in anticipation of local transit improvements.

Regional Transportation Plan

SANDAG’s Regional Transportation Plan, or MOBILITY 2030, is based on the long-range population, housing, and employment projections of SANDAG’s preliminary 2030 Cities/County Forecast. As the proposed Plan would change the forecasted demographic values for the downtown area, the proposed Plan would be inconsistent with the assumptions used in the development of MOBILITY 2030. The proposed Community Plan is consistent in that it would facilitate a regional employment and housing center which would maximize density and transit opportunities.

California State Implementation Plan (SIP)

The proposed Downtown Community Plan would be consistent with the California SIP. The assumptions of the SIP are based on growth trends anticipated by regional land use plans, including the Centre City Community Plan. The proposed Downtown Community Plan proposes increases in residential and employment populations above that anticipated by the Centre City Community Plan. However, the regional growth assumed by the SIP would not be substantially different, as anticipated growth would be concentrated to the downtown area providing relief from growth pressures in other parts of metropolitan San Diego and the county. The focus of growth downtown would be consistent with the goals of the SIP as downtown would be walkable, would provide employment opportunities in short proximity to residential areas, and would be better poised to offer a variety of transit opportunities such as bus, trolley, and train than other San Diego neighborhoods.

With implementation of the proposed Community Plan, downtown’s growth would increase. The downtown planning area would complement the goals of the RAQS by offering a variety of transit opportunities and by providing employment and neighborhood amenities within walking distance of residential areas. Therefore, there would be no conflict with the RAQS.

Water Quality Control Plan for the San Diego Basin

The proposed Downtown Community Plan would not conflict with the water quality control standards established by the Water Quality Control Plan. The Water Quality Control Plan states: “point sources and nonpoint sources of pollution shall be controlled to protect designated beneficial uses of water.” The proposed land uses would be consistent with the beneficial uses allowed for the San Diego Bay, including contact and non-contact recreation and wildlife habitat. As discussed in Chapter 5.9, Best Management Practices (BMPs) would be implemented during and after construction of individual development projects resulting from implementation of the Plan to minimize urban pollutants contributing to runoff from the area.

Multiple Species Conservation Program

The Downtown Community Plan would have no significant direct impact on the goals and objectives of the MSCP as no significant biological resources occur within the downtown area. However, increasing housing and employment opportunities downtown would remove development pressure from vacant land supporting the sensitive biological resources which are the focus of the MSCP.

Comprehensive Land Use Plan (CLUP) Airport Land Use Compatibility Plan (ALUCP) – San Diego International Airport (SDIA)

The proposed Downtown Community Plan views the proximity of the SDIA as an asset to the downtown planning area and also a potential risk to its residents. Through a rare crash occurrence, there would be risks of injury, loss of life, and/or property damage. In addition, noise related to airport activities has the potential to negatively affect surrounding areas, including downtown. To minimize these risks, the Downtown Community Plan includes Airport Influence goals and policies that would require consistency with the proposed CLUPALUCP for the SDIA which is anticipated to be adopted in 2006. Policy 13.3-P-1 would “regulate development within the various areas impacted affected by Lindbergh Field as follows:

- Building Heights. Consistent with the SDIA CLUPALUCP and City of San Diego restrictions;
- Use and Intensity Limitations. As established by the SDIA CLUPALUCP (incorporated by reference in the City of San Diego’s Municipal Code); and
- Noise Sensitive Uses. Use the City of San Diego’s adopted noise contour boundaries and use regulations as included in the Municipal Code.”

Policy 3.2-P-6 would reduce conflicts with the ALUCP by:

- Restricting building intensities underneath the approach path to Lindbergh Field consistent with the ALUCP.

As the Downtown Community Plan is designed to integrate and implement the CLUPALUCP, there would be no conflict.

5.1.3.2 Land Use Compatibility (LU-B)

Land use incompatibility may result at the interface of different types of land uses. Sources of incompatibility are related to noise, lighting/shading, and transient activities.

Noise

Noise incompatibility occurs when noise generators are located near sensitive noise receivers. Examples of sensitive noise receivers include residential units, senior facilities, hospitals, churches and schools. Noise generators are any use which would cause noise levels at common property lines with noise sensitive receivers to exceed the limits established by the City's Noise Abatement and Control Ordinance, Section 59.5.01101 through 59.5.0802 as described in Chapter 5.7. Noise generators which may occur under the proposed Plans and Ordinance include: entertainment (restaurants, bars, theaters, nightclubs and ballpark), industrial, freeway and major downtown streets, aircraft and railroad activities.

Ballpark Noise

Impact LU-B.1
Ballpark Noise

Noise sensitive uses could be significantly impacted by entertainment activities associated with the ballpark. According to the Ballpark SEIR (CCDC 1999), the area within four blocks of the ballpark could be significantly impacted by crowd noise and fireworks associated with the ballpark. As such, ballpark noise impacts would be limited to future development within East Village within this four-block radius.

Traffic Noise

Impact LU-B.2
Traffic Noise

Residential uses located adjacent to high volume grid streets and freeways would experience excessive levels of noise, resulting in a significant land use compatibility impact. As discussed in Section 5.7, traffic noise from I-5 would exceed acceptable exterior levels within a minimum of 475 feet. In addition, any grid street which would carry more than 7,000 average daily trips would expose future noise-sensitive uses to unacceptable exterior noise levels. Freeway noise impacts would adversely impact noise sensitive uses within Little Italy, Cortez, and East Village. Noise from high volume grid streets would occur throughout all of the neighborhoods.

Aircraft Noise

Impact LU-B.3
Aircraft Noise

Noise sensitive uses within the 65 dB(A) CNEL contour of the San Diego International Airport would be significantly impacted by aircraft noise. Aircraft noise would interfere with a number of common activities including television viewing, conversations and sleeping. Aircraft noise would impact the northerly portions of Little Italy and Cortez.

Railroad Noise

Impact LU-B.4
Railroad Noise

Noise generated by railroad activity would significantly impact noise sensitive uses located nearby. Railroad noise sources include engine, horn and wheel noise as well as crossing bells. Although the average noise levels

generated by railroad activities would not exceed 24-hour average standards, railroad noise would disturb sleep patterns of persons living nearby to the railroad tracks. Railroad noise impacts would be expected to occur in the following districts: Little Italy, Columbia, Marina, East Village and Convention Center.

Other Noise Sources

Other forms of entertainment noise (e.g. restaurants, bars, theaters, and nightclubs) are regulated by Section 59.5.0502(b) of the City of San Diego Municipal Code. In addition, the proposed Downtown Community Plan includes a policy to provide a discretionary review process for these uses to ensure compatibility with surrounding uses (13.4-P-4). Therefore, the Municipal code and proposed Plan would limit future resident's exposure to incompatible entertainment noise sources, with the exception of ballpark noise.

Industrial and marine industry activities such as manufacturing or loading activities, could generate noise levels which would adversely affect noise sensitive uses. Pursuant to ~~Table 1906-A of~~ the proposed PDO, heavy manufacturing or marine industries would not be allowed in any zones with the exception of Mixed Commercial and Industrial Transportation. In addition, a Conditional Use Permit would be required by the proposed PDO when they are proposed within these zones to give an opportunity for the incorporation of noise control measures.

Lighting/Shading

Lighting

Impact LU-B.5
Ballpark Lighting

According to the Ballpark SEIR, field lighting associated with the ballpark could significantly impact sleep patterns within a two-block radius. Ambient night-time lighting levels in the area are generally less than 2.0 foot-candles. According to the Ballpark EIR, field lighting could cause light levels to exceed the ambient condition within a two-block radius. Light sensitive activities (e.g. sleep) could be adversely impacted by light in excess of ambient levels. Ballpark lighting impacts would be limited to East Village within the immediate area of the ballpark.

Lighting impacts associated with decorative lighting of buildings or outdoor security lighting would be controlled by the City's Light Pollution Ordinance.

Shading

Shading impacts to recreation spaces would be avoided by the proposed Plan through a proactive planning approach designed to reduce shading impacts on major planned neighborhood parks. Policy 5.3-P-1 establishes height limitations around parks to maintain uninterrupted sunlight with specific criteria delineated in the PDO. Sun access criteria are established in the Little Italy neighborhood to protect outdoor spaces from excessive shading.

Transient Activities

Impact LU-B.6
Transient Impacts

Increased development activity could have a significant land use compatibility impact on surrounding neighborhoods by encouraging transients in downtown to relocate into surrounding neighborhoods.

Development within the downtown area could discourage transient activities because the areas would be active around the clock. Seeking more isolation, the transient population could move into the surrounding neighborhoods. The construction of proposed freeway lids could also affect dispersal of the transient population by making it easier to cross I-5 as well as providing open areas. Areas most susceptible to increased transient activities would be undeveloped canyons in residential neighborhoods within Uptown, Golden Hill, Sherman Heights and Barrio Logan, park land within Balboa Park, and vacant buildings and existing industrial areas within Barrio Logan.

The presence of a large transient population is often accompanied by a number of activities which would adversely affect neighborhood character, particularly in residential areas. Common problems include inadequate personal hygiene, litter, crime, and panhandling. Urination and defecation on public and private property poses not only an aesthetic but also public health concern. Unsanitary personal shelter areas and improper disposal of trash detract from the appearance of an area. Although the number of displaced homeless may be relatively low in surrounding neighborhoods, the sensitivity of residential neighborhoods and parks to the physical changes associated with homeless activities would result in even a small number of additional homeless having a significant impact on the physical conditions in residential neighborhoods and parks.

Industrial Activities

Significant land use compatibility issues between: (1) future residential uses and existing industrial uses, or (2) future industrial uses with existing or future residential uses would not be anticipated due to goals, policies and regulations contained in the proposed Plans and Ordinances in combination with existing local, state and federal regulations. The source of land use compatibility issues would generally be noise, hazardous materials, visible air emissions and/or odors associated with ongoing and/or future industrial uses downtown.

Existing regulations serve to reduce the potential impacts to below a level of significance. As stated earlier, the City Noise Control and Abatement Ordinance establishes limits on noise levels at common property lines between industrial and residential uses. These noise levels are designed to protect residential uses from excessive noise. The County of San Diego Department of Environmental Health along with the City of San Diego Fire Department regulate the use of, disposal of, and generation of hazardous materials associated with industrial uses which would control the potential health risk to nearby residential uses. Lastly, the County Air Pollution Control District regulates air emissions related to industrial uses.

In addition to these enforceable regulations, the Downtown Community Plan recognizes the importance of promoting industrial development that would be compatible with the mixed use goal for downtown including residential uses. For example, in describing the uses allowed in the Mixed Commercial designation, the Community Plan directs any future industrial to demonstrate that air quality in surrounding residential areas and neighborhoods not be adversely affected. In addition, the following sentence has been added to policy 3.3-P-2 in the Community Plan: "Allow for higher standard of review for residential development adjacent to industrial land use districts." This will allow CCDC to add provisions to the development permit as part of its standard review and will allow flexibility in determining the standards to use in light of any new state standards which may be established.

5.1.3.3 Physically Divide an Established Community (LU-C)

The proposed Downtown Community Plan would not divide an established community. The Downtown Community Plan would create individual neighborhoods organized around an activity center. The boundaries, however, would not divide existing neighborhoods as they would be “paper” boundaries; or, a tool for planners to use when developing land use policies. The boundaries would not result in physical divisions in the downtown landscape. Furthermore, the Downtown Community Plan does not propose any structure or development that would cause a community to become divided. Rather, it proposes to strengthen community identity and make communities more accessible through the development of neighborhood centers, the designation of certain streets as “green streets” to facilitate pedestrian movement between downtown neighborhoods, and the construction of freeway lids to connect downtown to surrounding neighborhoods. Therefore, the buildout of the downtown area would not consist of neighborhood islands isolated from one another, but rather identifiable neighborhoods that would be integrated and connected together.

The development of large facilities (projects with footprints exceeding one block) have the potential to divide an established community by attracting divisive streams of traffic, blocking designated view corridors, and interrupting the street grid. The Downtown Community Plan would allow large facilities to be developed in certain areas, but would apply goals and policies on their design in order to prevent or substantially reduce such adverse impacts.

Goal 3.6-G-1: Allow large facilities only in appropriate locations, and provided that projects do not interrupt community fabric, street grid, designated public views, or the viability of Neighborhood Centers, and that facilities are designed to be compatible in scale and texture with the surrounding uses.

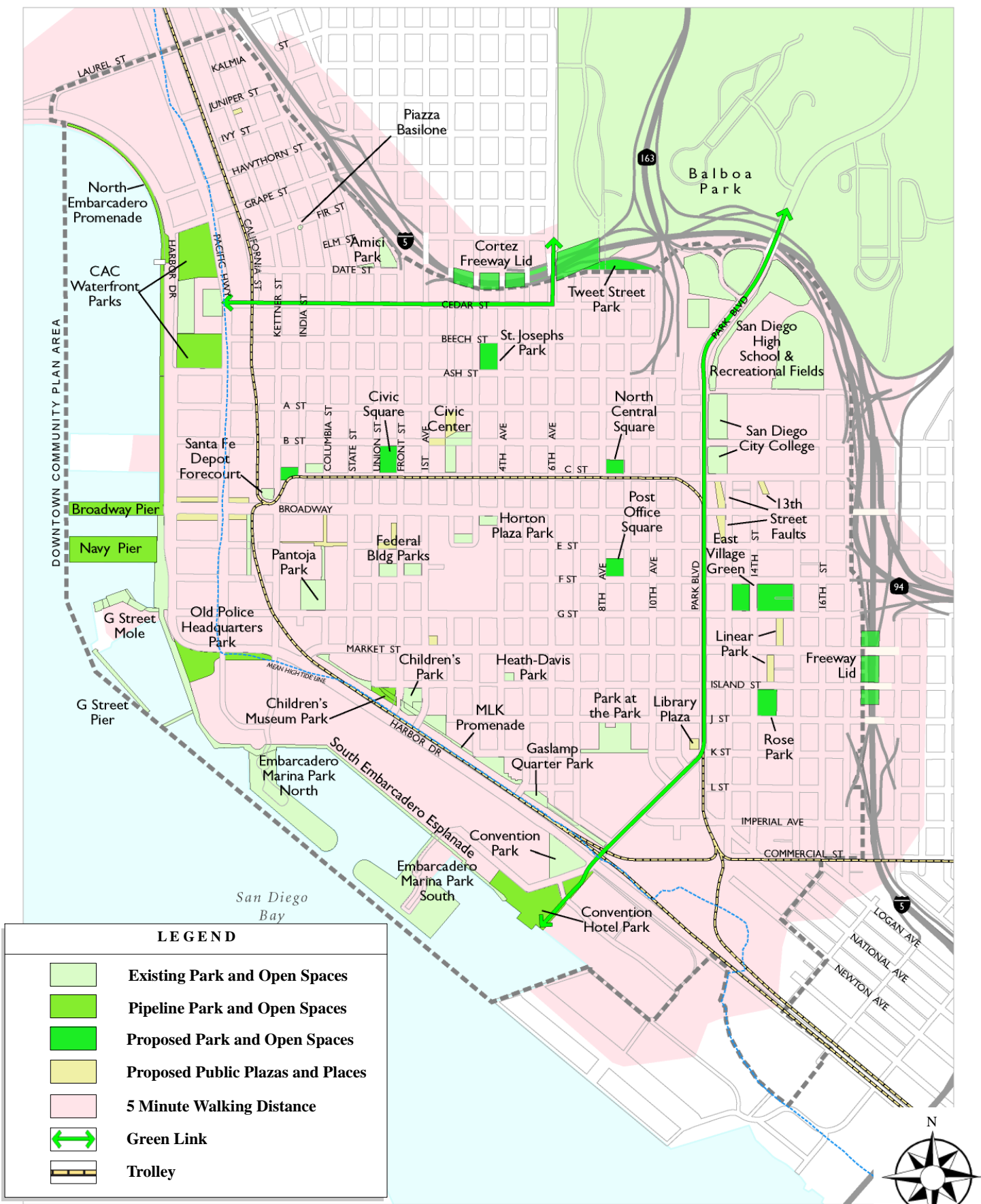
Policy 3.6-P-1: Ensure that all large facilities maintain or reinstate the street grid, and through design and development standards, that they are seamlessly integrated with the surroundings.

Policy 3.6-P-2: Require all large facilities to undergo a discretionary design review process.

Therefore, implementation of the Downtown Community Plan would avoid dividing established communities within the downtown planning area and surrounding areas.

5.1.3.4 Substantially increase the physical deterioration of existing neighborhood, community or regional parks through excessive use (LU-D)

A variety of public and private recreational opportunities are available to the residents of downtown San Diego including City-operated parks and recreation areas, school facilities, and non City-operated recreation areas (Figure 5.1-3 and Table 5.1-1). The Marina neighborhood, with the North and South Embarcadero Marina parks and Pantoja Park, contains the majority of downtown’s public park space. Park space is generally located in Columbia, Gaslamp, and Core neighborhoods. Although school and college facilities provide over 26 acres of recreational opportunity downtown,



Source: Downtown Community Plan, 2005



Parks and Open Space Figure 5.1-3

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**TABLE 5.1-1
Existing Downtown Parks and Open Space**

PARK	ACREAGE
<i>Existing Parks</i>	
San Diego High School Recreational Fields	21.3 ¹
Embarcadero Marina Park South	10.6
Embarcadero Marina Park North	9.9
County Administration Center Open Space	6.0
City College Outdoor Areas	4.0
Martin Luther King, Jr. Promenade	3.3
Pantoja Park	2.9
Outfield Park	2.8
Other existing parks (including Amici Park, Children's Park, Convention Center Park, G Street Mole, Civic Center Plaza, and Horton Plaza Park)	15.1
Sub-total	78.9
<i>Pipeline Parks</i>	
North Embarcadero Esplanade	11.8
County Administration Center Waterfront Parks	8.8
Other approved and under-development parks	4.9
Sub-total	25.5
TOTAL	104.4

¹ Use by the general public is restricted to times when school activities are not occurring.

Source: CCDC, Downtown Community Plan, 2005

they are considered to be limited use since they are only available to the public during non-school hours.

Currently, there are over 104 acres of existing, under-development, and approved park space. This would indicate that for every 1,000 downtown residents, there are approximately four acres of parks. However, of the park land, 21 acres belong to the North and South Embarcadero Marina parks, which are not readily accessible by foot by most of downtown's residents. Excluding these two parks and the semi-public school recreational and outdoor areas, 55.6 acres of accessible park space downtown remains, or two acres per 1,000 residents.

The proposed Downtown Community Plan places a major emphasis on enhancing and/or adding parkland within downtown. A total of up to 131 acres would be devoted to park and recreation uses

(Figure 5.1-3). The land use concept calls for a centralized park as an integral part of each of the planned downtown neighborhoods. In addition, the Plan calls for several blocks to be devoted to larger parks while also encouraging the creation and utilization of plazas and pocket parks. The quality of new parks would be maintained through sun access criteria that would ensure sunlight on parks during peak use hours. Finally, the implementation of a Transfer of Development Rights (TDR) program would facilitate the purchase of new park space. The Plan's intention to increase the number, variety, quality, and accessibility of park and recreation opportunities within downtown is expressed in the following goals and policies:

Increased Number and Variety

- Goal 4.1-G-1: Develop a comprehensive open space system that provides a diverse range of outdoor opportunities for residents, workers, and visitors.
- Policy 4.1-P-1: Develop at least 15 acres of new parks and plazas open and accessible to the public.
- Policy 4.1-P-8: Pursue new smaller open spaces – including public plazas and places, fountains, and pocket parks – on portions of blocks throughout downtown and on geologic faults to supplement the larger public open spaces, provide local focus points, and diversify the built environment.
- Policy 4.1-P-10: Require private common open spaces as part of all large new residential developments.

Improved Quality

- Goal 4.1-G-4: Make the new public parks and plazas harmonious, inspirational, and sources of community pride and character through community participation and design excellence.
- Policy 4.1-P-5: Continue efforts to improve the waterfront open space network according to the North Embarcadero Visionary Plan and connecting to the redeveloped Seaport Village.
- Policy 4.1-P-11: Implement a program to reclaim open spaces that have deteriorated, have design features that limit access and use opportunities, and/or are in need of activity and revitalization.
- Goal 5.3-G-4: Ensure uninterrupted sunlight during designated periods on all major parks, and maintain standards to ensure adequate sunlight on sidewalks and streets in Neighborhood Centers and residential areas.
- Policy 5.3-P-1: Restrict building heights as follows:
- Around parks to maintain uninterrupted sunlight with specific criteria delineated in the PDO:

- In Marina and Gaslamp for sunlight and urban design considerations;
- Stepping down towards the water in the North Embarcadero area;
- Surrounding the CAC; and
- ~~Throughout downtown, consistent with policies and regulations for airport operations established by the Federal Aviation Administration (FAA), the Airport Land Use Compatibility Plan (ALUCP) and the Airport Approach Overlay Zone. In the approach zone to Lindbergh Field, as required by the Federal Aviation Administration (FAA).~~

Improved Accessibility

- Goal 4.1-G-2: Provide public open space within walking distance of all residents and employees.
- Goal 4.1-G-3: Improve accessibility to recreational, leisure, and cultural opportunities on the waterfront and at Balboa Park.
- Policy 4.1-P-9: Improve the Green Streets as an essential element of the open space system – as connections to the waterfront, Balboa Park, activity centers, parks and plazas; as tree-lined open spaces; and as continuous recreational paths.

With implementation of the goals and policies in the proposed Community Plan to increase the number, variety, quality, and accessibility of park space, there would be no significant impact to parks and recreation.

Transfer of Development Rights Program

The primary mechanism for ensuring that parks and recreation space would be achieved through implementation of a TDR program. The TDR program would be established through the following goals and policies:

- Goal 3.2-G-4: Use transfer of development rights as a mechanism to create new parkland, open space and preserve historic resources.
- Policy 4.1-P-3: Establish a comprehensive program to obtain parkland using a variety of techniques, including but not limited to acquisition and a TDR program potentially allowing proposed open space site owners to sell development rights to property owners in higher-intensity areas of downtown.

The TDR program would be a financing tool for the purchase of downtown park space, facilitating parkland creation. Through the program, all sites designated for public parks that are in private ownership would be eligible to transfer or sell their development rights to a “TDR bank” or receiving site. Receiving sites identified in the Downtown Community Plan would be able to add the development rights from the park site or the bank to that which is allowed by right. This process allows sending sites to realize the increased land value of the property at its full development

potential while preserving the site for park development. Although the receiving site would be permitted to develop at an increased density, there would be no change in type of use. The Downtown Community Plan would restrict TDR receiver sites to areas equipped to support higher densities, such as the proposed Civic/Core, Columbia, and East Village neighborhoods. Designated sending and receiving sites are shown in Figure 5.1-4.

5.1.4 MITIGATION MEASURES

Impact LU-B.1 Ballpark Noise

As discussed in Chapter 5.7, implementation of the noise attenuation measures identified in the acoustical analysis required by Mitigation Measure NOI-B.2-1 would reduce interior noise levels to 45 dB (A) CNEL and reduce potential impacts to below a level of significance.

Impact LU-B.2 Traffic Noise

Completion of noise studies and implementation of appropriate noise attenuation required by Mitigation Measure NOI-B.1-1 in Chapter 5.7 would reduce land use compatibility impacts from traffic noise but not to below a level of significance as exterior noise levels may continue to exceed acceptable levels.

Impact LU-B.3 Aircraft Noise

Completion of noise studies and implementation of appropriate noise attenuation required by Title 21 of the California Code would reduce interior noise levels in new development to within acceptable limits but would be unable to reduce exterior noise levels to within acceptable limits.

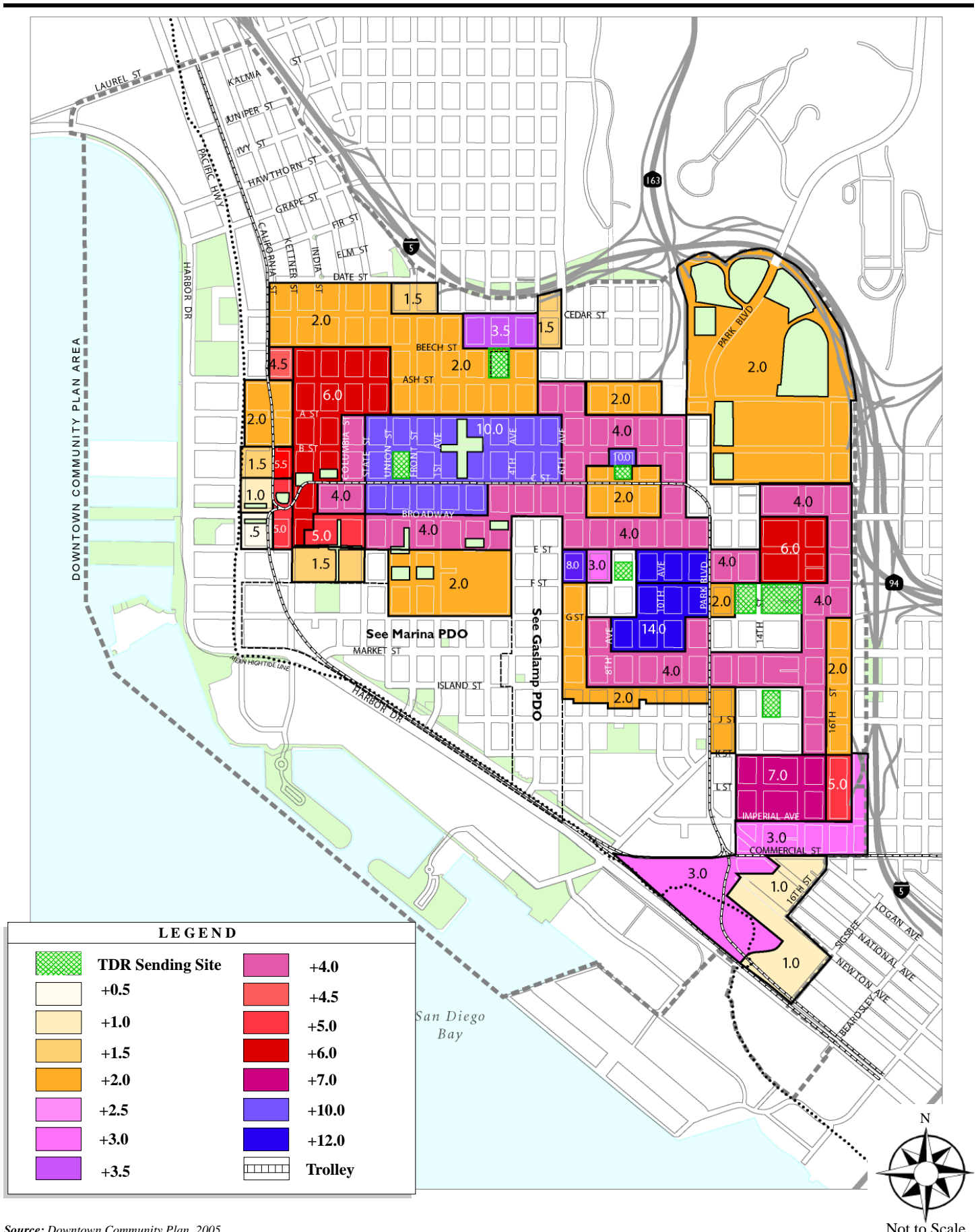
Impact LU-B.4 Railroad Noise

The Downtown Community Plan would include a policy which would seek establishment of quiet zones and enforce ban on sounding of horns (Policy 13.4-P-2). However, implementation of this policy would be subject to the approval of the California Public Utilities Commission and it would not restrict the crossing bells. Crossing bell noise could be reduced by the following measure:

Mitigation Measure LU-B.4-1: Prior to approval of a ~~Development Permit~~ Building Permit which would expose ~~sleeping-habitable rooms areas~~ to disruptive railroad noise, an acoustical analysis shall be performed. The analysis shall determine the expected exterior and interior noise levels related to railroad activity. As feasible, noise attenuation measures shall be identified which would reduce noise levels to 45 dB(A) CNEL or less in sleeping-habitable rooms. Recommended measures shall be incorporated into building plans before approval of a ~~Development~~ Building Permit.

Impact LU-B.5 Ballpark Lighting

Mitigation Measure LU-B.5-1: Prior to approval of a Development Permit which would result in a light sensitive use within a two-block radius of Petco Park, the applicant shall provide a lighting study that demonstrates to the satisfaction of CCDC that habitable rooms would be equipped with light attenuation measures which would allow occupants to reduce night-time light levels to 2.0 foot-candles or less.



Source: Downtown Community Plan, 2005



TDR Sending and Receiving Sites _____ Figure 5.1-4

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Impact LU-B.6 Transient Activities

Finding effective solutions for adverse effects from transient activities has been a challenge in downtown areas throughout the country. Similar problems have faced downtown San Diego. Many local social service and charity organizations provide assistance to help homeless individuals find the medical, nutritional and career assistance necessary to overcome their homelessness. In a similar effort, a Homeless Outreach Team (HOT) was created as a mitigation measure in the Ballpark EIR to provide proactive support to homeless. HOT teams comprised of a police officer and a social worker move through areas of homeless populations to distribute information on how to find the help offered by local social service providers. Continued support of these types of efforts is the most appropriate form of mitigation for potential homeless impacts to surrounding communities.

5.1.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION**Impact LU-B.1** Ballpark Noise**Level of Significance After Mitigation: Not Significant**

As discussed in Chapter 5.7, implementation of the noise attenuation measures identified in the acoustical analysis required by Mitigation Measure NOI-B.2-1 would reduce interior noise levels to 45 dB (A) CNEL and reduce potential impacts to below a level of significance.

Impact LU-B.2 Traffic Noise**Level of Significance After Mitigation: Significant**

Implementation of noise attenuation required by Mitigation NOI-B.1-1 would reduce interior noise levels to acceptable levels but may not be able to reduce exterior noise levels to acceptable levels. Thus, traffic noise could result in a significant and unmitigated land use compatibility impact.

Impact LU-B.3 Aircraft Noise**Level of Significance After Mitigation: Significant**

Completion of noise studies and implementation of appropriate noise attenuation required by Title 21 of the California Code would reduce interior noise levels in new development to within acceptable limits but would be unable to reduce exterior noise levels to within acceptable limits. Thus, aircraft noise would create significant and unmitigated land use compatibility impacts.

Impact LU-B.4 Railroad Noise**Level of Significance After Mitigation: Significant**

Implementation of noise attenuation required by Mitigation LU-B.4-1 and implementation of quiet zones would reduce railroad noise but may not be able to eliminate the interference with sleep

patterns associated with noise created by crossing bells, locomotive engines and wheels. Thus, railroad noise is considered significant and unmitigable.

Impact LU-B.5 Ballpark Lighting

Level of Significance After Mitigation: Not Significant

Implementation of the light attenuation measures required by Mitigation Measure LU-B.5.1 would reduce potential impacts to below a level of significance.

Impact LU-B.6 Transient Activities

Level of Significance After Mitigation: Significant

As indicated earlier, effective solutions for homelessness have proven challenging across the country, and San Diego has proven to be no exception. Thus, impacts from migration of displaced transient populations into surrounding neighborhoods are considered significant and unmitigable.

5.2 TRANSPORTATION, CIRCULATION, ACCESS AND PARKING

5.2.1 EXISTING CONDITIONS

The following discussion is based on a transportation analysis completed by Wilson & Company. This analysis evaluates major forms of transportation including automobile, transit and non-motorized options. In addition, the report includes an evaluation of parking supply and demand. A complete copy of this report is contained in Appendix 2.2. A full set of the traffic model worksheets is contained in Volume 3 of this EIR.

5.2.1.1 Existing Roadways

Configuration

The roadway network serving downtown is comprised of regional and local roadways (Figure 5.2-1). Regional roadways are represented by the state and federal highways including I-5, SR-163, and SR-94. I-5 is a north/south freeway serving coastal cities in San Diego County and running northward to Orange and Los Angeles counties and beyond, and southward to the international border with Mexico. SR-163 is also a north/south freeway running from I-15 in the north to Tenth and Eleventh Avenues in downtown. SR-163 provides access to I-8, I-805 and I-15 as well as to SR-52. SR-94 is an east-west freeway running from downtown eastward through southeastern San Diego and terminating at I-8 in eastern San Diego County.

Local roads consist of a grid network with several one-way roadways in both the north-south and east-west directions. Major streets within the grid provide access to the freeway system via couplets. Tenth and Eleventh Avenues provide access to and from SR-163. F and G Streets provide access to SR-94. Access to I-5 is possible from a number of grid streets including Laurel Street, First Avenue, Fifth Avenue, and E Street.

Currently, the 1992 Community Plan divides downtown roadways into six categories: freeway, primary arterial, major street, collector street, business street and local street. Street classifications and examples of characteristic streets are discussed below.

Freeways. Freeways serve to carry through-traffic and are fully access controlled by grade separations, interchanges and ramp connections. Freeways vary in width from four to eight or more lanes.

Prime Arterials. A prime arterial carries heavy vehicular traffic, relatively low pedestrian traffic, and moderate bicycle and transit traffic. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and very restricted access to abutting properties. Only Harbor Drive, north of Market Street, is classified as a six-lane primary arterial.

Major Arterials. Major arterials provide a network of roadway access to prime arterials and the freeway system. They also provide access to abutting commercial and industrial properties. They

carry moderate to heavy traffic volumes, low to high pedestrian and bicycle movements, and moderate to high transit movements. Major arterials generally have raised center median, street trees, and sidewalks. Examples of major arterials in the downtown area include Pacific Highway, Kettner Boulevard, Front Street, Fifth Avenue, Park Boulevard, Market Street and Ash Street.

Collector Streets. Collector streets primarily provide connections between local/collector streets and streets of higher classification. The collector street provides access to abutting property and carries low to moderate traffic volumes, low to heavy pedestrian volumes, moderate to heavy bicycle volumes, and low to moderate transit movements. Collector streets have on-street parking, street trees, traffic safety street lighting, and sidewalks. Collector streets in the downtown study area include Columbia Street, State Street, Tenth Avenue and Eleventh Avenue.

Business Streets. Business streets are usually two-, three- or four-lane facilities. Their primary purpose is to carry through traffic and to provide access to abutting property. Business streets function as either one- or two-way facilities. The business street is unique in that it carries a high volume of traffic at low travel speeds (given the short spacing of traffic signals at each block). Business streets have on-street parking, street trees, traffic safety street lighting, and sidewalks.

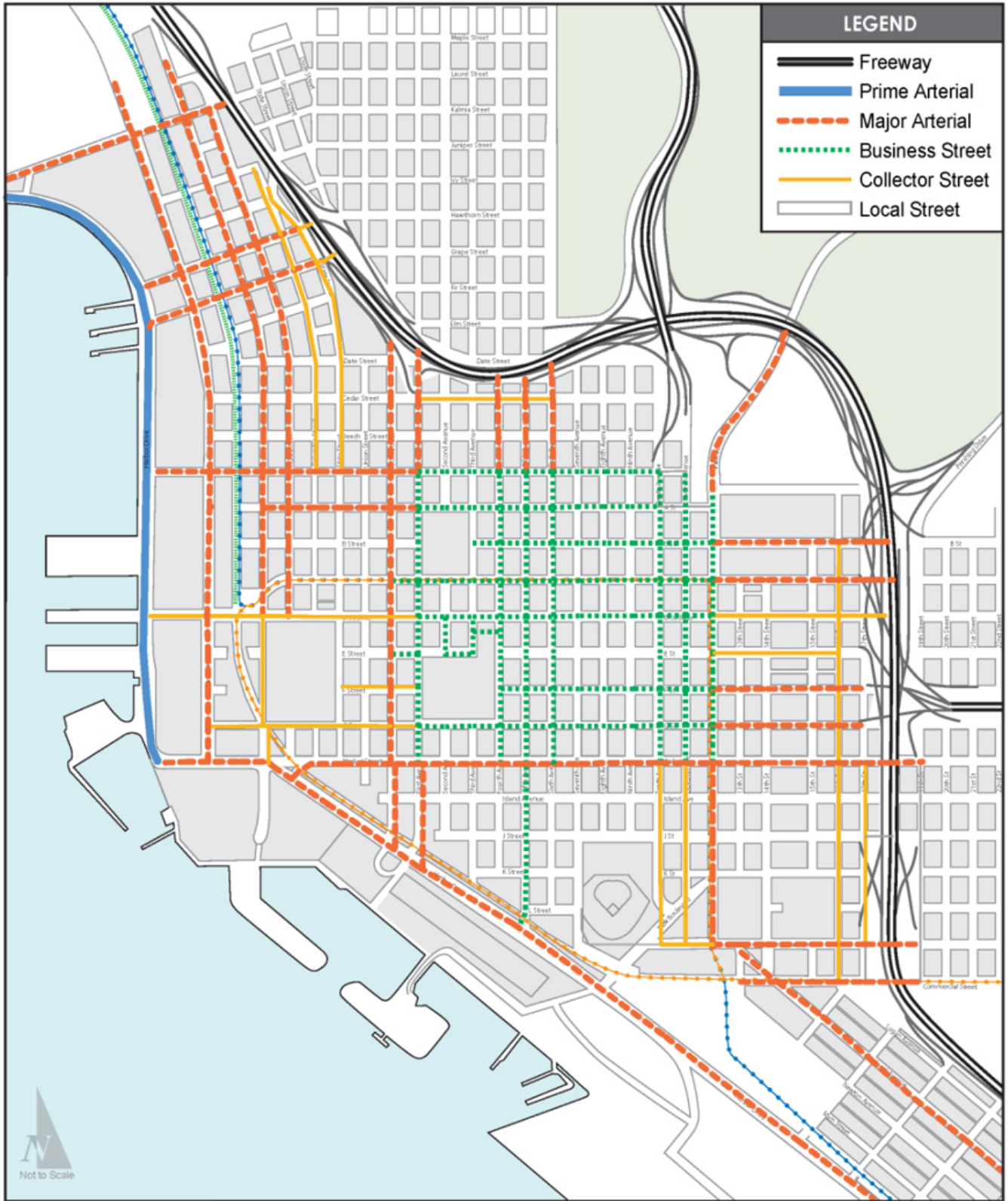
Local Streets. Local streets primarily provide direct access to abutting property. They carry low traffic volumes, low to heavy pedestrian volumes, and low to moderate bicycle volumes. Local streets have on-street parking, street trees, traffic safety street lighting, and sidewalks. Examples of the local streets in the downtown include Seventh Avenue, Ninth Avenue, K Street, 14th Street, Island Avenue, Beech Street and Ivy Street.

Traffic signals are used extensively on the grid to manage traffic flow. The majority of downtown signalized intersections are incorporated into a coordinated and interconnected traffic system through a master controller, enabling synchronized operation along major corridors.

Volumes

The existing traffic volumes on the grid streets (based on year 2002 data) are illustrated in Figures 5.2-2A and B. The heaviest traveled streets in the north-south direction are Harbor Drive, Pacific Highway, Park Boulevard and First Avenue. The heaviest traveled streets in the east-west direction are F Street, Grape Street, Hawthorn Street and Laurel Street. These roadways currently carry traffic volumes in excess of 20,000 vehicles per day.

The freeway volumes on I-5 through the downtown area currently range from 160,000 to 220,000 ADT. Volumes on SR-94, just east of downtown approach 100,000 ADT, while SR-163, just north of downtown, currently carries approximately 101,000 ADT.



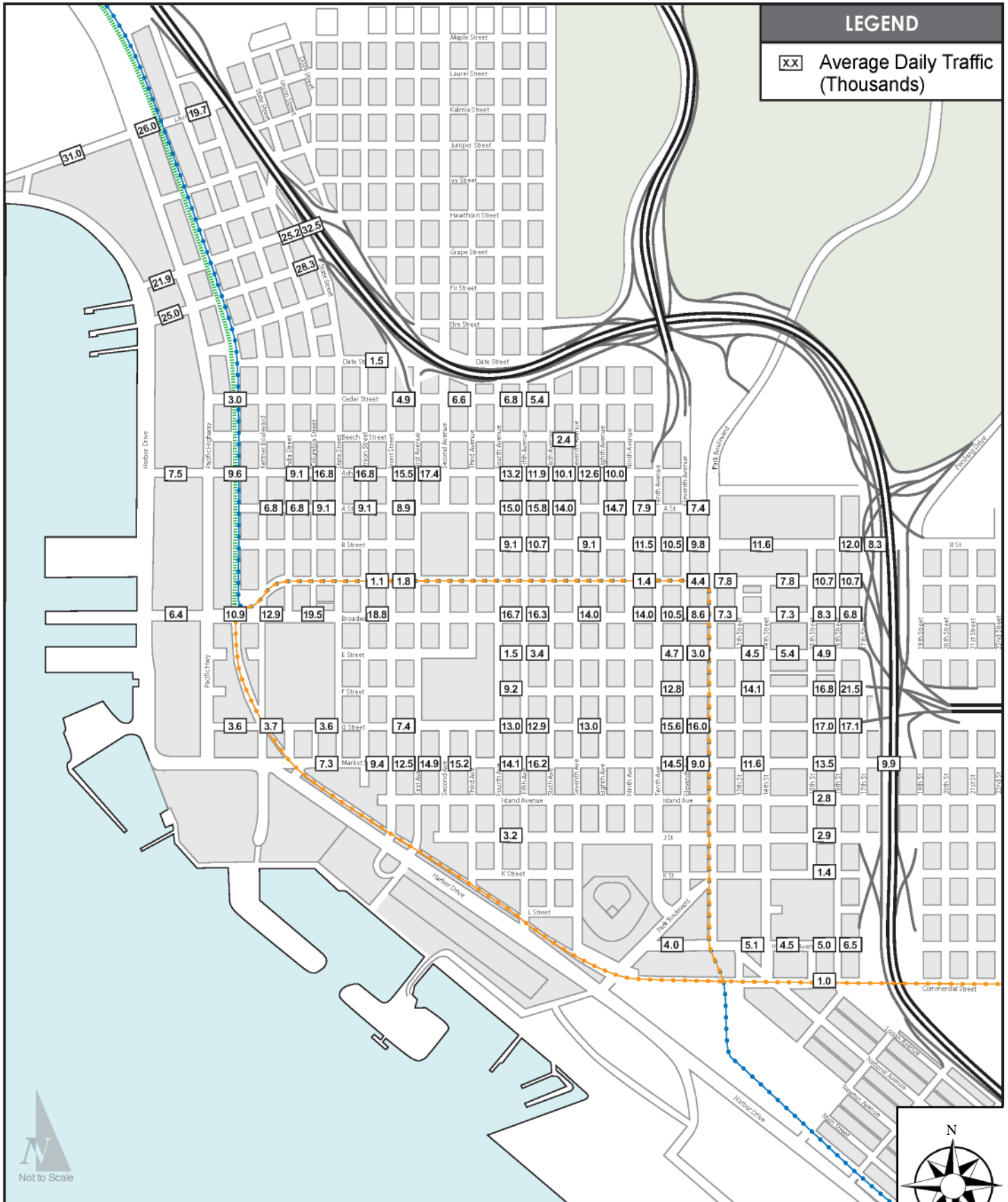
Source: Wilson and Company, 2005



Existing Roadways

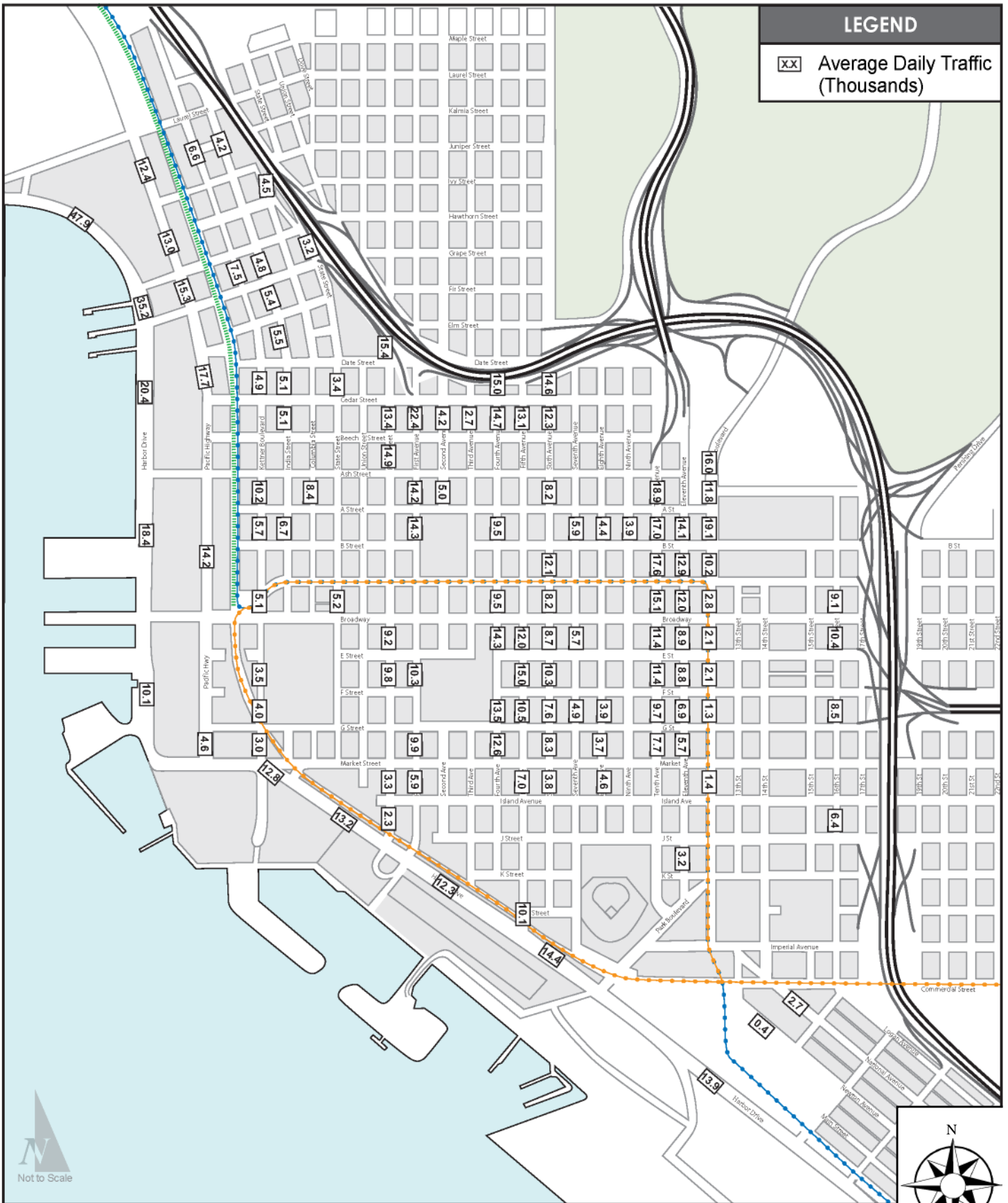
Figure 5.2-1

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Source: Wilson and Company, 2005

Existing Traffic Volumes on East-West Roadways _____ Figure 5.2-2A



Source: Wilson and Company, 2005

Existing Traffic Volumes on North-South Roadways _____ Figure 5.2-2B

Level of Service

The flow of traffic within the relatively dense grid roadway network in the downtown is controlled by the performance of intersections, and specifically their operation during the peak hours. A total of 128 intersections were analyzed under existing conditions. Figure 5.2-3A and B graphically display the intersection analysis results for existing AM and PM peak hours, respectively. During the PM peak hour, six intersections operate at LOS D-E and two operate at LOS F; the remaining intersections operate at LOS C or better.

The concept of Level of Service (LOS) is defined as a qualitative measure describing operational conditions within a traffic stream and the perception of motorists and/or passengers. An LOS definition generally describes these conditions in terms of such factors as speed, travel time, freedom to maneuver, comfort, convenience, and safety. LOS ranges from A to F. Table 5.2- 1 describes the generalized traffic flow for the various LOS on roadway segments. The delay associated with the various LOS at intersections are identified in Table 5.2-2.

**TABLE 5.2-1
Level of Service Definition for Grid Streets**

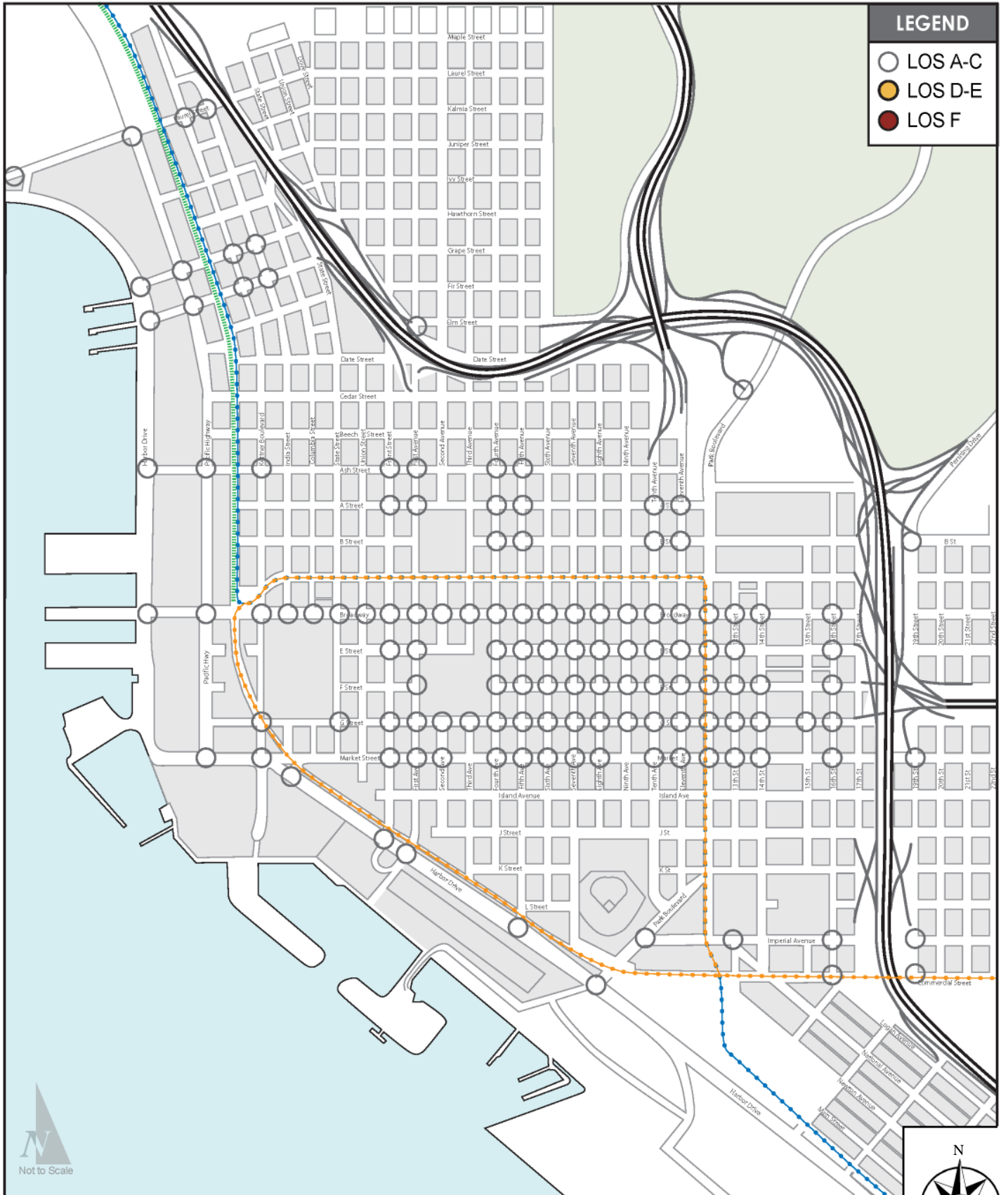
LOS	CONGESTION/DELAY	TRAFFIC FLOW QUALITY
A	None	Low volumes, high speeds. Speed not restricted by other vehicles. All signal cycles clear with no vehicles waiting through more than one signal.
B	None	Operating speeds beginning to be affected by other traffic. Less than 10% of signal cycles have vehicles waiting through more than one signal cycle.
C	None to minimal	Operating speed and maneuverability closely controlled by other traffic. Between 10% and 30% of signal cycles have vehicles waiting through more than one signal cycle.
D	Minimal to substantial	Tolerable operating speeds. Between 30% and 70% of signal cycles have vehicles waiting through more than one signal cycle.
E	Significant	Capacity; Maximum traffic volume an intersection can accommodate. 70% to 100% of signal cycles have vehicles waiting through more than one signal cycle.
F	Considerable	Long queues of traffic. Unstable flows. Travel speeds can drop to zero.

Source: Highway Capacity Manual 2000

Levels of Service on freeway segments are described in Table 5.2-3. Freeway LOS is calculated in the peak direction of flow during both the AM and PM peak hours.

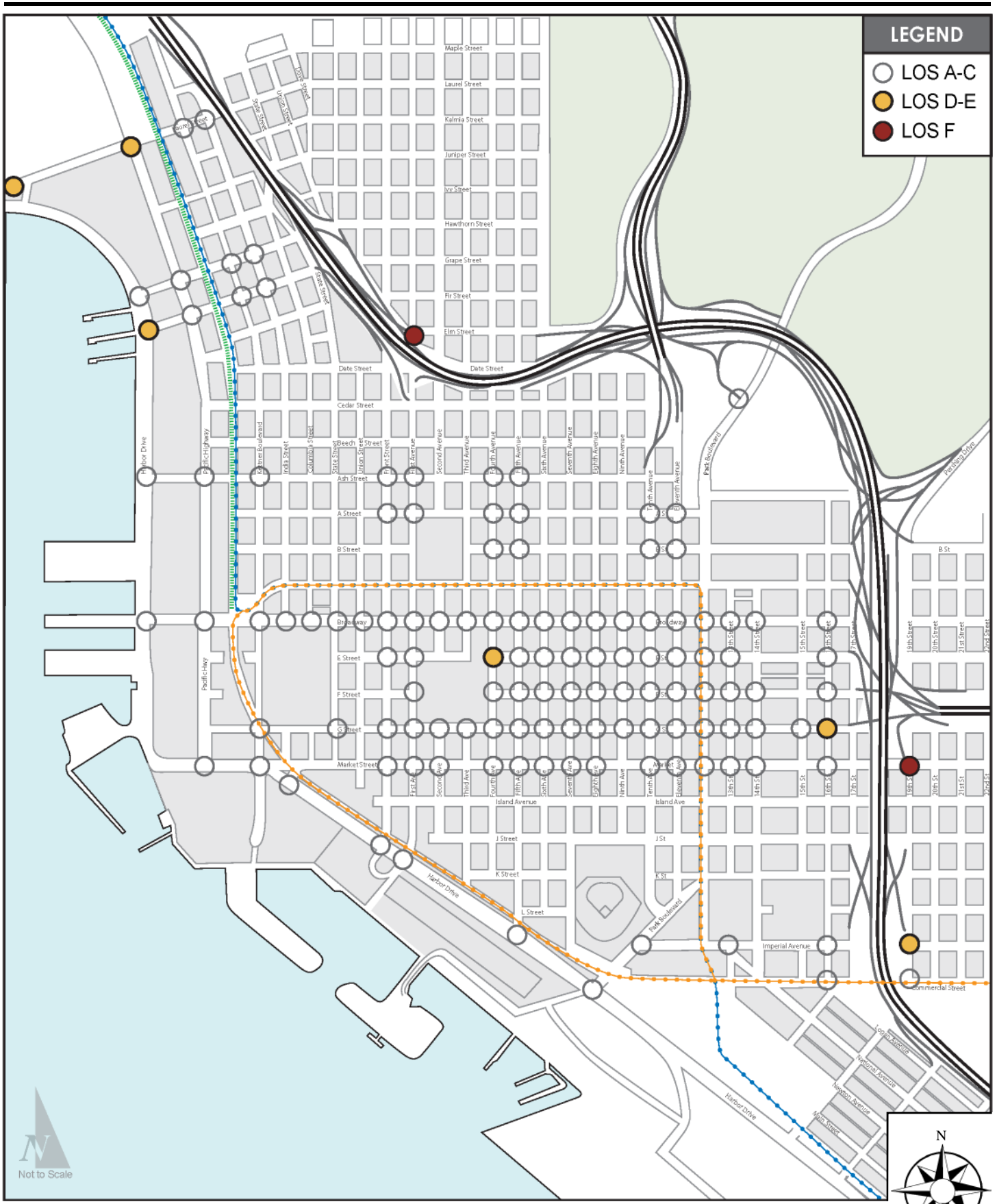
Due to high volumes and limited capacity, the following three freeway segments currently operate at unacceptable LOS F during the AM and/or PM peak hours:

- I-5 between SR-94 and Pershing Drive (southbound (SB) during the PM peak hour);
- I-5 between Pershing Drive and SR-163 (SB during the PM peak hour); and
- SR-163 between I-5 and Washington Street (northbound (NB) during the PM peak hour and SB in the AM peak hour).



Source: Wilson and Company, 2005

Existing Level of Service (AM) _____ Figure 5.2-3A



Source: Wilson and Company, 2005

Existing Level of Service (PM) _____ Figure 5.2-3B

**TABLE 5.2-2
Level of Service Based on Intersection Delay on Grid Streets**

AVERAGE STOPPED DELAY PER VEHICLE (SECONDS / VEHICLE)	LOS CHARACTERISTICS
≤ 10	LOS A describes operations with very low delay. This occurs when progression is extremely favorable, and most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
> 10 – 20	LOS B describes operations with generally good progression and/or short cycle lengths. More vehicles stop than for LOS A, causing higher levels of average delay.
> 20 – 35	LOS C describes operations with higher delays which may result from fair progression and/or longer cycles lengths. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping
> 35 – 55	LOS D describes operations with high delay, resulting from some combination of unfavorable progression, long cycle lengths, or high volumes. The influence of congestion becomes more noticeable, and individual cycle failures are noticeable.
> 55 – 80	LOS E is considered to be the limit of acceptable delay. Individual cycle failures are frequent occurrences.
> 80	LOS F describes a condition of excessively high delay, considered unacceptable to most drivers. This condition often occurs when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay.

Source: 2000 Highway Capacity Manual

**TABLE 5.2-3
Freeway Segment Level of Service Definitions**

LOS	VOLUME/CAPACITY RATIO	CONGESTION/DELAY	TRAFFIC DESCRIPTION
A	≤0.41	None	Free flow.
B	0.42-0.62	None	Free to stable flow, light to moderate volumes.
C	0.63-0.80	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted.
D	0.81-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
E	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
F	>1.00	Considerable; 0-1 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go.

Source: Wilson & Company; July 2005

As shown in Figures 5.2-3A and B, the following downtown freeway on-ramps are currently operating at LOS F during the AM and/or PM peak hours:

- I-5 NB On-Ramp at B Street (AM peak hour);
- I-5 NB On-Ramp at Eleventh Avenue (AM and PM peak hour);

- I-5 NB On-Ramp at First Avenue (PM peak hour); and
- I-5 SB On-Ramp at Grape Street (PM peak hour).

The following downtown freeway off-ramp is currently operating at LOS F during the AM peak hour:

- I-5 SB Off-Ramp at Cedar Street (AM peak hour).

All freeway off-ramps are currently operating at acceptable LOS during the PM peak hour.

5.2.1.2 Transit

The downtown area is served by a variety of transit services, including intercity passenger rail, commuter rail, light rail, and an extensive network of local bus routes, connecting the downtown area to the rest of the region. Key transit centers serving the downtown include the Twelfth and Imperial Transfer Station and the Santa Fe Depot, which provide linkages between bus routes, light rail lines, and commuter rail services.

San Diego Trolley. Two trolley lines run to and through downtown, forming a loop within the downtown area. The Blue Line connects to Mission Valley in the north, and to National City, Chula Vista, and Imperial Beach in the south; ending at the international border in San Ysidro. The 2005 opening of the Blue Line extension will provide a connection to San Diego State University. The Orange Line runs from Santee, El Cajon, La Mesa, and Lemon Grove in the northeast and terminates in the downtown.

Coaster Commuter Rail. The Coaster is a commuter rail service operated by the North County Transit District. The service connects the Oceanside Transit Center, Carlsbad Village, Carlsbad Poinsettia, Encinitas, Solana Beach, Sorrento Valley, the Old Town Transit Center, and downtown. It uses the historic Santa Fe Depot, located at Columbia and Broadway, as its downtown terminal.

Amtrak Intercity Rail. Amtrak currently provides nine daily intercity connections between downtown and Los Angeles and beyond, with local stops in Oceanside and Solana Beach.

Local/Express Buses. There are currently 28 bus routes serving downtown with wide service coverage and frequent service linking the downtown area with outlying communities. In addition, peak period express bus service links the downtown area with residential communities along both the I-8 and I-15 corridors.

Table 5.2-4 displays the number of existing daily transit trips and total daily person trips within (originating and/or destined to) the downtown area. Total person trips incorporate all travel modes including automobile, transit, walk and bicycle trips. As shown, over 20% of all downtown work trips currently take place by transit, with an overall transit mode share of 4.3% for all downtown person trips.

**TABLE 5.2-4
Existing Downtown Transit Mode Share**

TRIP PURPOSE	TRANSIT TRIPS	TOTAL PERSON TRIPS	TRANSIT MODE SHARE (%)
Work	27,800	132,650	20.9
Total	53,550	1,226,460	4.3

Source: SANDAG, February 2005

5.2.1.3 Non-motorized Transportation

The downtown environment includes a wide variety of land uses in close proximity providing numerous opportunities for non-motorized travel including walk, bicycle, and pedicab modes. Downtown residents, as well as employees and visitors, are able to accomplish many of their travel requirements without the need for an automobile.

Currently, key areas of pedestrian activity in downtown occur in and around Horton Plaza, the governmental/financial districts along B and C Streets, and throughout the Gaslamp Quarter. Broadway also serves as a significant pedestrian corridor, with the concentration of bus service along the street and interaction among the business and retail/commercial activities in the area.

Table 5.2-5 displays the number of existing daily non-vehicle trips and total daily person trips within the downtown area. As shown, over 15% of all downtown trips currently take place via non-motorized modes (walk, bicycle, and pedicab).

**TABLE 5.2-5
Projected Non-Motorized Trips**

TRIP PURPOSE	NON-MOTORIZED TRIPS	TOTAL PERSON TRIPS	NON-MOTORIZED MODE SHARE (%)
Work	9,060	132,650	6.8
Total	192,240	1,226,460	15.6

5.2.1.4 Existing Parking

Supply

As shown in Table 5.2-6, the total existing supply of parking in downtown is estimated at 56,880 spaces; of which, 69% of the inventory are available to the public. This estimate is based on an inventory completed by the CCDC in August 2003. The parking inventory summarized the number of parking spaces by parking type including on-street parking, public off-street, and private off-street. Public parking includes both on-street and off-street lots and structures which are readily available for public use. Private parking is restricted to specific property owners and/or lessees, and is typically associated with residential uses. Table 5.2-6 summarizes the results of the CCDC August 2003 parking inventory.

**TABLE 5.2-6
Current Inventory of Downtown Parking**

TYPE		NUMBER OF SPACES
Public Parking	On-Street Parking	6,990
	Off-Street Public Parking	34,230
	Total Public Parking	41,220
Private Parking	Off-Street Private Parking	15,660
Public and Private Parking Total		56,880

Source: CCDC, August 2003

Demand

The total estimated parking demand under current conditions in downtown is 57,824 spaces. This estimate was developed by applying representative parking demand ratios to existing downtown land uses. Table 5.2-7 displays a summary of existing downtown land uses and the estimated parking demand.

**TABLE 5.2-7
Current Downtown Parking Demand**

LAND USE	QUANTITY	PARKING DEMAND RATIO	TOTAL PARKING SPACES REQUIRED
Office	13,144,000 sf	2.1 / 1,000 sf	27,602
Retail	2,658,000 sf	2.3 / 1,000 sf	6,112
Hotel	8,800 rooms	0.5 / room	4,400
Residential	14,600 units	1.35 / unit	19,710
Total Current Parking Demand			57,824

Source: Wilson & Company, July 2005

Based upon a comparison of the existing supply versus the existing demand, a parking deficit of 944 spaces exists. Given the dynamics of the parking estimates (both on the supply and demand side), the comparisons above can reasonably be interpreted to indicate a relative balance in downtown-wide supply and demand under existing conditions, notwithstanding the localized parking shortages which can occur during major downtown [events](#).

5.2.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinance would result in a significant, direct environmental impact related to transportation if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

- Significance Criterion TRF-A.1** Cause the LOS on a roadway segment or intersection to drop below LOS E;
- Significance Criterion TRF-A.2** Cause the LOS on a freeway segment to drop below LOS E, or cause a ramp delay in excess of 15 minutes;
- Significance Criterion TRF-B** Cause the capacity and service capabilities of existing and planned transit services to be exceeded;
- Significance Criterion TRF-C** Substantially discourage use of non-motorized forms of transportation; or
- Significance Criterion TRF-D** Create an average demand for parking which would exceed the available average supply.

Cumulatively significant traffic impacts would result at locations where build-out of the proposed Downtown Community Plan would contribute to substandard (LOS F) traffic operations on facilities that currently operate at LOS F under existing conditions. These impacts are discussed in Chapter 6.0.

5.2.3 ENVIRONMENTAL IMPACTS

5.2.3.1 Methodology

This section outlines the key assumptions and methods employed to develop daily and peak hour travel forecasts as well as estimate LOS for the major downtown transportation facilities, including freeways, freeway ramps, and intersections.

Land Use Assumptions

For estimating the transportation impacts, the analysis used a buildout traffic volume that would be generated by a realistic rather than maximum buildout of the land use type and intensity possible under the proposed Plans and Ordinance.

The projected buildout under the Community Plan was derived by synthesizing information about existing conditions and development projects in the “pipeline” with potential future growth calculations including density bonus provisions in the proposed Plans and Ordinance. Potential growth was calculated, in part, from the application of assumed average intensities to vacant parcels and sites with infill potential. As indicated on page 3-26 of the Proposed Community Plan,

“Designation of a site for certain use does not necessarily mean that the site will be built/redeveloped with the designated use within the horizon of the Plan. Similarly, sites that are not anticipated to be redeveloped may actually be reused.” These assumptions were developed while taking into account maximum FAR allowed by the Community Plan, context and compatibility with existing development, and economic and other trends. Potential density bonuses achieved through State affordable housing regulations were not factored in. However, it is not anticipated that these bonus provisions would represent a substantial number of residential units.

The resulting buildout projection, which is approximately 80% of the worst-case maximum exclusive of State affordable housing bonus programs, provides a reasonable distribution of potential future growth with respect to allowable FAR ranges, land use types, and projected market potential. For the purposes of calculating buildout population, an average household size of 1.6 was assumed, with a housing unit occupancy rate of 95 percent. These assumptions were based on Census data and demographic trends in downtown.

The land use densities which were assumed for estimating buildout traffic volumes are illustrated in Table 5.2-8.

**TABLE 5.2-8
Proposed Downtown Community Plan Land Uses**

LAND USE TYPE	QUANTITY
Residential	53,100 units
Office	29,821,000 square feet
Retail	6,070,000 square feet
Hotel	20,000 rooms

Source: Downtown Community Plan, 2005

Proposed Roadway Network

As detailed in the proposed Community Plan, the following roadway classifications are assigned to downtown roadways.

Boulevards. Broad roadways that accommodate pedestrians and vehicular traffic. Provide access to commercial uses. Traffic volumes high, but speeds are moderate.

Green Streets. Streets that link parks and other downtown amenities. Enhanced landscaping, including double rows of trees and expanded sidewalk widths. Vehicular and transit access.

Residential Streets. Streets that traverse neighborhoods and have residential orientation. Maximized on-street parking, including diagonal parking. Vehicular traffic is low volume and low speed.

Main Streets. Serves neighborhood centers and other major activity zones. Lined with commercial activity. Low travel speeds.

Multi-Function Streets. Serves a variety of purposes and does not fall within any of the other classifications.

Figure 5.2-4 displays the proposed downtown street typology system under buildout of the Downtown Community Plan.

~~)Several roadway network improvements and modifications are proposed as part of the proposed Community Plan (Table 5.2-9).~~

~~Some of the more significant street modifications proposed by the Community Plan include the following:~~

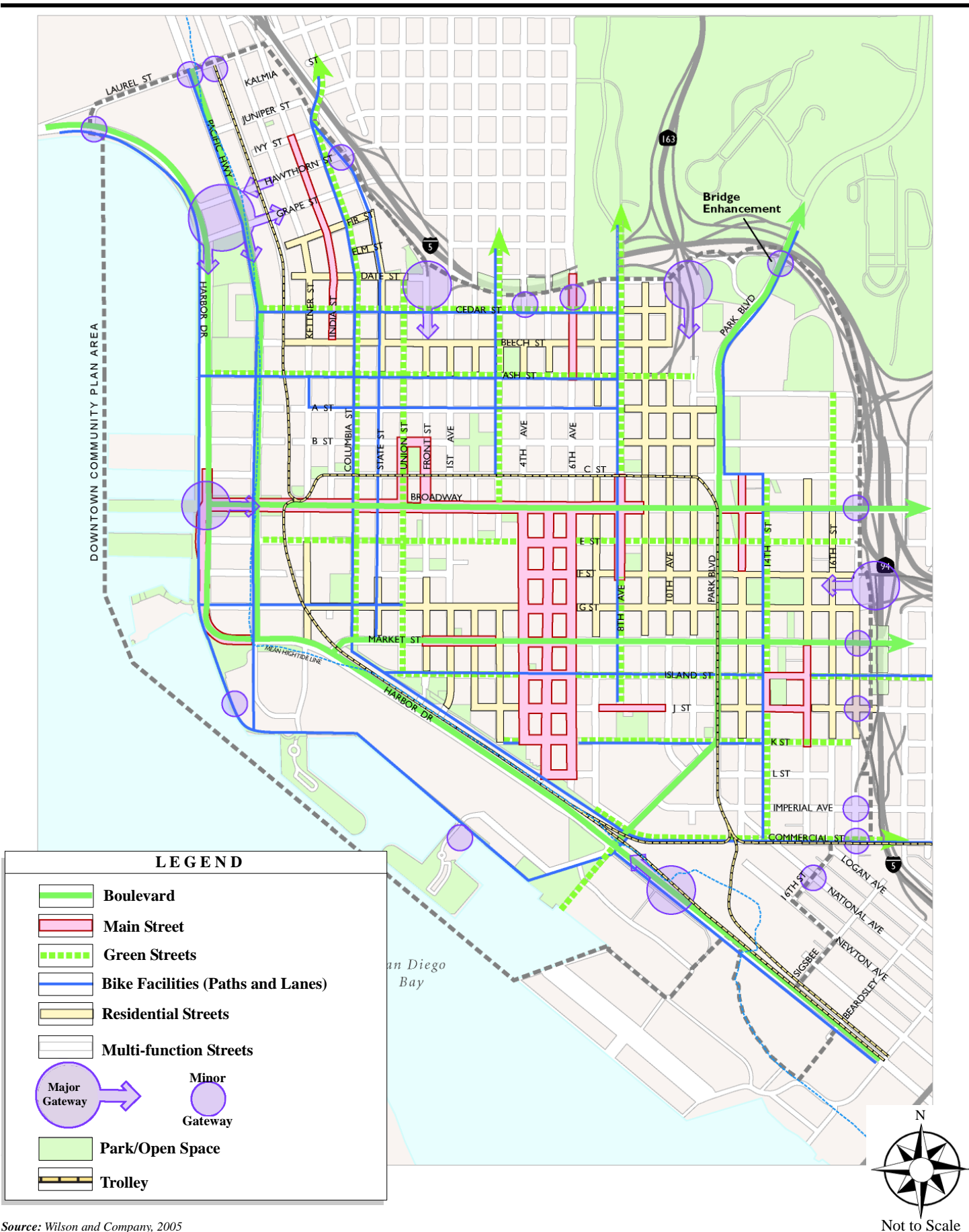
- ~~• Closure of the southbound I-5 off-ramp to Cedar Street and conversion of Cedar Street to two-way traffic from Front Street to Fifth Avenue;~~
- ~~• Conversion of Columbia Street from three lanes to two lanes during off-peak travel periods.~~
- ~~• Closure of C Street between Columbia Street and Park Boulevard for purposes of implementing a transit-only facility;~~
- ~~• Conversion of Sixth Avenue from one-way southbound (three lanes) to two-way (one lane each direction) from Elm Street to Ash Street;~~
- ~~• Conversion of Seventh Avenue, between Beech Street and B Street, from three lanes to two lanes (one-way northbound);~~
- ~~• Extension of Eighth Avenue north across I-5 and linking to Balboa Park. To the south, Eighth Avenue would be converted from three lanes to two lanes (one-way southbound) between Ash Street and G Street,;~~
- ~~• Conversion of Ninth Avenue, between Ash Street and Market Street, from three lanes to two lanes (one-way northbound); and~~
- ~~• Connection of A, B, C, E, F and G Streets between Harbor Drive and Pacific Highway.~~

Traffic Forecast Modeling Assumptions

The SANDAG Regional Transportation Model was utilized to prepare future year buildout traffic forecasts. The following major assumptions were incorporated into the computer modeling process.

Growth

Growth factors were derived by comparing modeled “existing” and modeled “future year” peak hour traffic. Growth factors from the modeling were then applied to existing peak hour traffic data to derive future year peak hour volumes.



Proposed Roadway Classifications _____ Figure 5.2-4

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Future Transit and Roadway Improvements

In anticipation of potential modifications of the downtown street system as part of the proposed Community Plan, the traffic analysis made specific assumptions for the purpose of modeling. These assumptions are identified in Table 5.2-9. It should be noted that while several of these assumptions were not ultimately proposed as part of the Community Plan, their inclusion in the analysis does not adversely affect the conclusions of the analysis. In fact, they assure that the analysis is based on a worst-case scenario.

In order to estimate the regional roadway improvements that would promote traffic flow in the future, the traffic analysis assumed that roadway improvements described in the Revenue-Constrained version of the Regional Transportation Plan (RTP) would be implemented. Although the recent reauthorization of Transnet theoretically allows for the implementation of the more extensive improvements contemplated by the MOBILITY 2030 version of the RTP, uncertainty regarding funding and the potential changes in priority prompted the use of the more conservative Revenue Constrained version for impact analysis.

The proposed Community Plan assumed future year transit improvements for the San Diego region and the downtown area consistent with the SANDAG Regional Transportation Plan (Revenue-Constrained Scenario). This assumes implementation of the following regional transit improvements:

- Extension of the Trolley through Mission Valley, including service to San Diego State University;
- Extension of the Trolley northbound along I-5, providing service to University of California, San Diego and University Towne Center via the Mid-Coast corridor;
- New and improved regional transit routes including BRT providing high speed and priority service throughout the region and downtown;
- Improved/new transit stations and centers; and
- Improved local and express bus service levels.

In addition to the regional transit improvements listed above, the proposed Community Plan includes a number of additional transit service enhancements focused on the downtown.

Downtown Bus Rapid Transit (BRT) Services. BRT is a transit service concept currently being studied and implemented by SANDAG across the region. It is a rubber-tire, rapid transit system designed to have the look and feel of light rail, offering high capacity service on dedicated lanes or city streets. Proposed BRT routes in the downtown area include use of B Street and C Street to access the downtown core as internal loops. The plan identifies the potential for converting C Street to also assume that a transit-only street lane would be implemented along C Street between Kettner Boulevard and Park Boulevard, requiring closure of the street to through traffic. However, further study would be conducted to determine the feasibility of this concept before implementation. Further study and refinement of the BRT routes in the downtown area are currently underway by CCDC and SANDAG.

TABLE 5.2-9
Proposed-Assumed Roadway Network Modifications

ROADWAY	SEGMENT	EXISTING NETWORK	<u>ASSUMED NETWORK</u>	PURPOSE / OBJECTIVES
Cedar Street	Front St. to Fifth Ave.	Mostly one-way, 2 and 3 lanes; with one two-way, 3-lane section (Eastbound)	Two-way, 2 lanes and removal of the off-ramp from I-5	<ul style="list-style-type: none"> Accommodate green street section Enhance connectivity in green street network Traffic calming Requires removal of the I-5 off-ramp to Cedar St.
A Street	Harbor Dr. to Pacific Highway	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity to waterfront.
B Street	Harbor Dr. to Pacific Highway	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity to waterfront.
C Street	Harbor Dr. to Pacific Highway	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity to waterfront.
	Columbia St. to Park Blvd.	Various: two-way, 2-lane; closed; one-way, 1-lane; one-way, 2-lane	Transit link only	<ul style="list-style-type: none"> Create consistency Closed to vehicular traffic Accommodate trolley, BRT, and/or downtown shuttles Complement westbound one-way traffic on B Street.
	Park Blvd. To I-5	One-way, 3-lane (Eastbound)	Two-way, 2-lane	<ul style="list-style-type: none"> Increase access around City College Traffic calming in College neighborhood, and north end of 13th Street neighborhood center Accommodate streetscape improvements
E Street	Harbor Dr. to Pacific Highway	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity to waterfront.
	State St. to Union St.	Two-way, 2-lane	Closed	<ul style="list-style-type: none"> Per Federal Courts expansion
	Park Blvd. to I-5	Various: one-way, 2-lane; two-way, 4-lane; two-way, 2-lane; one-way, 1-lane	One-way, 3-lane (Eastbound)	<ul style="list-style-type: none"> Create consistency with western portion of street Complement F/G couplet, to carry increased amounts of traffic
F Street	Harbor Dr. to Pacific Highway	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity to waterfront
G Street	Harbor Dr. to Pacific Highway	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity to waterfront
	Front St. to First Ave.	One-way, 3-lane (Eastbound)	Two-way, 3-lane	<ul style="list-style-type: none"> Create consistency with western portion of street

TABLE 5.2-9 (Continued)
Proposed Roadway Network Modifications

ROADWAY	SEGMENT	EXISTING NETWORK	PROPOSED PLAN NETWORK	PURPOSE / OBJECTIVES
L Street	14 th St. to 16 th St.	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> • Improve connectivity in Bayside create fine-grained street grid
Kettner Street	Cedar St. to Beech St.	One-way, 3-lane (Southbound)	One-way, 2-lane	<ul style="list-style-type: none"> • Accommodate residential street section • Traffic calming • Consistent with adjacent residential segment of Kettner Blvd., from Fir St. to Cedar St.
India Street	Ivy St. to Fir St.	One-way, 3-lane (Northbound)	One-way, 2-lane	<ul style="list-style-type: none"> • Accommodate neighborhood center section • Traffic calming • Consistent with adjacent neighborhood • Center segment of India St., from Fir St. to Beech St.
Columbia Street	Ivy St to Broadway	one-way, 3-lane (Southbound)	2-lane off-peak/ 3-lane peak	<ul style="list-style-type: none"> • Accommodate green street section • Off-peak traffic calming • Accommodate bikeway
Union	Broadway to F St.	One-way, 2-lane (Northbound)	Closed	<ul style="list-style-type: none"> • Per Federal Courts expansion
Second Avenue	Broadway to C St.	Two-way, 2-lane	Closed at C St.	<ul style="list-style-type: none"> • Extension of Civic Center Trolley Station to accommodate 4-car trains.
Third Avenue	G St. to Market St.	Two-way, 3-lane	Two-way, 2-lane	<ul style="list-style-type: none"> • Accommodate diagonal parking • Accommodate residential street section • Traffic calming • Consistent with two-way 2-lane traffic from Market St. to K St.
Sixth Avenue	I-5 to Ash St.	One-way, 3-lane (Southbound)	Two-way, 2-lane	<ul style="list-style-type: none"> • I-5 NB off-ramp at Sixth Ave currently provides free left-turn onto Sixth Ave; signal would have to be reconfigured • Accommodate neighborhood center street section • Traffic calming • Consistent with traffic north of I-5. • Provide retail-boosting north-bound turns from Ash St.
Seventh Avenue	Beech St. to Ash St.	One-way, 3-lane (Northbound)	Two-way, 2 lane	<ul style="list-style-type: none"> • Consistency with surrounding network.

TABLE 5.2-9 (Continued)
Proposed Roadway Network Modifications

ROADWAY	SEGMENT	EXISTING NETWORK	PROPOSED PLAN NETWORK	PURPOSE / OBJECTIVES
Seventh Avenue (cont'd.)	Ash St. to B St.	One-way, 3-lane (Northbound)	One-way, 2-lane	<ul style="list-style-type: none"> Accommodate residential street section Traffic calming Consistent with lanes on residential blocks from Date St. to Beech St.
	B St. to Broadway	One-way, 3-lane (Northbound)	Closed a C St.	<ul style="list-style-type: none"> Accommodate 4-car Trolleys
Eighth Avenue	Ash St. to Broadway	One-way, 3-lane (Southbound)	One-way, 2-lane	<ul style="list-style-type: none"> Accommodate green street section Accommodate bikeway Accommodate neighborhood center section Consistent with segment from Date St. to Ash St. Traffic calming Improve connectivity from A St. and B St.
	Broadway to G St.	One-way, 3-lane (Southbound)	One-way, 2-lane	<ul style="list-style-type: none"> Accommodate green street section Accommodate bikeway Accommodate neighborhood center section Consistent with lanes from Date St. to Ash St Traffic calming.
	Date to Elm	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> New connection to Balboa Park/ I-5 Lid
Ninth Avenue	Ash St. to Market St.	One-way, 3-lane (Northbound)	One-way, 2-lane	<ul style="list-style-type: none"> Accommodate residential street section Consistent with lanes from. Date St. to Ash St. Traffic calming.
13th Street	C St. to E St.	Two-way, 2-lane	Two-way, 3-lane	<ul style="list-style-type: none"> Per Park-to-Bay Link.
14th Street	E St. to Market St.	Two-way, 3-lane	Two-way, 2-lane	<ul style="list-style-type: none"> Accommodate green street section Accommodate bikeway. Consistent with configuration from C St. to E St.; Market St. to Imperial Ave. Traffic calming .
15th Street	K St. to Imperial Ave.	Closed	Two-way, 2-lane	<ul style="list-style-type: none"> Improve connectivity Create finer-grained street grid.
new grid	South of Harbor Dr., between Pacific Highway and Kettner St.	None	Grid of two-way, 2-lane streets extending to waterfront	<ul style="list-style-type: none"> Improve connectivity to waterfront Create access to redevelopment in police headquarters area

Source: CCDC *Downtown Community Plan*, 2005

Downtown Shuttles. The analysis assumes the development of intra-downtown shuttles connecting key activity nodes, as recommended in the proposed Community Plan. The downtown shuttle as proposed would connect downtown's neighborhoods, running in a loop along Ash Street, A Street, 13th Street, Market Street, and Kettner Boulevard.

Downtown Grid

Due to the anticipated need to add four-car trolleys to meet the increased demand, the traffic analysis assumed as a worst case scenario that Seventh Avenue would be closed at C Street. This would allow the extensions of the trolley platform without impeding traffic flow. While this closure is not proposed by the Community Plan, it was assumed to provide a conservative analysis of the downtown traffic flow with implementation of the proposed Plans and Ordinance. Additional traffic studies should be conducted before closing Seventh Avenue at C Street to examine potential impacts on surrounding businesses.

Parking

For the purposes of this assessment, baseline parking demand ratios used by the City of San Diego were assumed. The parking demand ratios assumed in this analysis and related demand estimates are illustrated in Table 5.2-10.

**TABLE 5.2-10
Parking Demand**

LAND USE	RATIO
Office	2.1 / 1,000 s.f.
Retail	2.3 / 1,000 s.f.
Residential	1.35 / dwelling unit
Hotel	0.5 / room

Source: Wilson & Company July, 2005

Peak Hour Intersection Analysis

Peak hour level of service at intersections was based on the SYNCHRO software (v.6) network simulation model. SYNCHRO is capable of accurately modeling the flow of traffic through a network of intersections, and accounting for the impacts of adjacent intersection operations. It is also capable of incorporating the impacts of adjacent at-grade rail crossings on intersection operations. SYNCHRO output is contained in volume 3.0.

5.2.3.2 Trip Generation

Based on the proposed land uses and the traffic modeling assumptions described earlier, build out of downtown under the proposed Community Plan is anticipated to generate a total of 2.7 million daily person trips which represents a 120% increase over the number of person trips currently taking place within downtown. This trip generation is based on the general land use designations of the Proposed Community Plan and does assume any specific trip generation from any specific property due to the

uncertainty associated with the ultimate type and intensity of use which may occur. Approximately 82% of the person trips are projected to be generated by non-residential land uses, a slightly lower percentage than existing (85%). A daily person trip represents a trip taken via various forms of transportation including private automobiles, trolleys, buses, trains, bicycle or on-foot.

The proposed TDR program, while not changing the overall magnitude of planned development in the downtown area and the associated total number of automobile trips generated each day, could result in different parcel-specific land use intensities than currently envisioned by the proposed Downtown Community Plan. Depending upon the actual transfer, this could change traffic flow patterns and related demands/impacts as analyzed and identified in the EIR. For the most part, the downtown grid system is effective in moving traffic, with the primary problem areas being the ramps to/from the freeway system. In most cases, a TDR would not be expected to create new and significantly different traffic impacts compared to those identified in this EIR. Notwithstanding, to ensure all impacts are properly identified, the potential effects of a proposed transfer would be evaluated as part of the Secondary Study process and subjected to more study if determined to have a potentially adverse impact on local traffic flow.

Of the total person trips, the proposed Community Plan would generate a total of 1,546,470 average daily automobile trips (ADT). This represents an increase of 112% over existing daily conditions. The peak hour period contribution of 33% would be similar to existing peak hour period conditions.

The anticipated vehicle trips would translate into 863,940 average vehicle miles traveled (VMT) which would represent an increase of 125% above existing levels. The anticipated VMT during peak periods would be 297,990 miles, represent about 35% of the total daily VMT, slightly lower than the current percentage of 40%.

Tables 5.2-11A and B provide a general illustration of the magnitude of the traffic increase that would occur with implementation of the proposed Community Plan. The segments for which volumes are estimated are located along the freeway area to provide a representation of the traffic volumes entering and exiting the downtown area.

5.2.3.3 Local Streets

Traffic flow on the grid streets within downtown is primarily a function of how well the intersections operate due to the frequency of intersections. Due the short segment distance between intersections, a separate LOS for street segments is not analyzed.

Impact TRF-A.1.1
Impacts on Grid Streets

The increased traffic volumes would result in significant congestion on portions of the downtown grid streets. With buildout of the Community Plan, 62 of the 275 intersections would operate at an unacceptable level of service (LOS F). Of the 62 intersections, all currently operate at an acceptable LOS in the AM peak hour and all but two operate at an acceptable level in the PM peak hour. Thus, significant direct impacts would occur at 60 intersections. Impacts to the other two are considered cumulatively significant and are discussed in Chapter 6.0. Table 5.2-12 displays the downtown study area intersections projected to operate at LOS F during the AM and/or PM peak hours along with average traffic delays. A brief description of the identified causes of the substandard intersection LOS is provided. For the most part, substandard intersection LOS is

associated with high volumes and limited capacity due to deficient intersection geometry and laneage.

As shown in Table 5.2-12 and Figure 5.2-5 15 intersections would operate at LOS F during both the AM and PM peak hours, six intersections would operate at LOS F only during the AM peak hour, and 41 intersections would operate at LOS F only during the PM peak hour.

TABLE 5.2-11A
Representative Changes in Traffic Volumes (East-West Streets)

	ROADWAY	SEGMENT	EXISTING	PROPOSED PLAN
1a	Laurel St.	Harbor Dr. to Pacific Hwy.	31,020	54,960
1b	Hawthorn St.	Columbia St. to State St.	25,220	41,940
1c	Grape St.	Columbia St. to State St.	28,300	51,820
Sub-Total			84,540	148,720
2a	Ash St.	Sixth Ave. to Seventh Ave.	10,150	14,210
2b	A St.	Sixth Ave. to Seventh Ave.	14,010	20,160
2c	B St.	Sixth Ave. to Seventh Ave.	11,070	19,900
Sub-Total			35,230	54,270
3a	C St.	15 th St. to 16 th St.	10,660	12,480
3b	Broadway	15 th St. to 16 th St.	8,250	9,680
3c	E St.	15 th St. to 16 th St.	4,860	6,240
3d	F St.	15 th St. to 16 th St.	16,840	31,370
3e	G St.	15 th St. to 16 th St.	16,950	32,960
3f	Market St.	15 th St. to 16 th St.	13,520	19,500
3g	Island Ave.	15 th St. to 16 th St.	2,810	17,600
3h	J St.	15 th St. to 16 th St.	2,930	12,340
3i	K St.	15 th St. to 16 th St.	1,420	3,780
3j	Imperial Ave	15 th St. to 16 th St.	5,000	12,130
3k	Commercial Ave.	15 th St. to 16 th St.	1,040	5,130
3l	National Ave.	Commercial Ave. to 16 th St.	2,750	17,730
Sub-Total			87,030	180,940
TOTAL (East-West)			206,800	383,930

Source: SANDAG; Wilson & Company, July 2005

**TABLE 5.2-11B
Representative Changes in Traffic Volumes (North-South Streets)**

	ROADWAY	SEGMENT	EXISTING	PROPOSED PLAN
1a	N. Harbor Dr.	Cedar St. to Beech St.	47,850	35,270
1b	Pacific Hwy.	Cedar St. to Beech St.	12,360	42,180
1c	Kettner Blvd.	Cedar St. to Beech St.	6,570	13,370
1d	India St.	Cedar St. to Beech St.	4,230	8,770
1e	State St.	Cedar St. to Beech St.	4,480	8,620
1f	Fir St. Ave.	Cedar St. to Beech St.	22,370	30,320
1g	Second Ave.	Cedar St. to Beech St.	4,170	7,400
1h	Third Ave.	Cedar St. to Beech St.	2,670	5,180
1i	Fourth Ave.	Cedar St. to Beech St.	14,690	21,400
1j	Fifth Ave.	Cedar St. to Beech St.	13,130	24,450
1k	Sixth Ave.	Cedar St. to Beech St.	12,350	18,980
Sub-Total			144,870	215,940
2a	Seventh Ave.	A St. to B St.	5,910	8,150
2b	Eighth Ave.	A St. to B St.	4,420	23,150
2c	Ninth Ave.	A St. to B St.	3,880	17,430
2d	Tenth Ave.	A St. to B St.	17,010	21,640
2e	11 th Ave.	A St. to B St.	14,140	18,860
2f	12 th Ave.	A St. to B St.	19,090	25,930
2g	16 th St.	Broadway to E St.	10,400	16,280
Sub-Total			74,850	131,440
TOTAL (East-West)			219,720	347,380

Source: SANDAG; Wilson & Company, July 2005

**TABLE 5.2-12
Impacted Intersections**

No.	INTERSECTION		LOS		CAUSE OF FAILURE	
	N/S Street	E/W Street	AM	PM	AM	PM
1	Pacific Highway	Laurel St.	E	F	N/A	RT Volumes, No Turn Lanes
2	Harbor Dr	Grape St.	B	F	N/A	NBT, NBR Volumes
3	Columbia St.	Grape St.	B	F	N/A	EBR Volume, No Turn Lane
4	State St.	Grape St.	A	F	N/A	NBR Volume
5	Fifth Ave.	Grape St.	A	F	N/A	EBL Volume
6	First Ave.	Elm St.	F	F ¹	NB Traffic heading to I-5 NB	NB Traffic heading to I-5 NB
7	Sixth Ave.	Elm St.	F	F	NB and WBL Volume	NB and WBL Volume
8	Fourth Ave.	Cedar St.	F	D	SB/WB Volume - No Turn Lanes	N/A
9	Sixth Ave.	Cedar St.	F	F	NB/SB Volume - No Turn Lanes	NB/SB Volume - No Turn Lanes
10	Park Blvd	I-5 SB On/Off	C	F	N/A	NBL Turning Volume
11	Front St.	Beech St.	F	F	SB/WB Volume - No Turn Lanes	SB/WB Volume - No Turn Lanes
12	Front St.	Ash St.	F	B	SBR Volume	N/A
13	First Ave.	Beech St.	F	F	Overall Volumes	Overall Volumes
14	Fourth Ave.	Beech St.	F	F	Overall Volumes	Overall Volumes
15	Fifth Ave.	Beech St.	F	F	Overall Volumes	Overall Volumes
16	Sixth Ave.	Beech St.	F	F	Overall Volumes, No Turn Lanes	Overall Volumes, No Turn Lanes
17	Sixth Ave.	Ash St.	F	F	SB Volume	SB Volume
18	Harbor Dr.	A St.	B	F	N/A	SBL Volume, No Turn Lane
19	Eighth Ave.	A St.	A	F	N/A	EBR, SBL Volumes
20	Ninth Ave.	A St.	A	F	N/A	EB Volume
21	Tenth Ave.	A St.	F	F	N/A	SB Traffic
22	Eleventh Ave.	A St.	F	F	NB Volume	NB Volume
23	Harbor Dr	B St.	B	F	N/A	SB Volume
24	Harbor Dr.	C St.	F	C	SB Volume, No Turn Lane	N/A
25	Ninth Ave.	B St.	B	F	N/A	NB Volume
26	16 th St.	B St.	F	F	WB Volume	N/A
27	15 th St.	C St.	F	F	N/A	EB Volume, No Turn Lane
28	16 th St.	C St.	F	F	Overall Volume, No Turn Lanes	Overall Volume, No Turn Lanes
29	State St.	Broadway	D	F	N/A	NB Volume
30	Eighth Ave.	Broadway	B	F	N/A	SB Volume
31	Ninth Ave.	Broadway	A	F	N/A	NB Volume
32	Harbor Dr.	E St.	C	F	N/A	SBL Volume, No Turn Lane
33	15th St.	F St.	F	B	WBR and SBR Volume	N/A
34	16th St.	F St.	F	F	WB and SB Volume, No Turn Lanes	WB and SB Volume, No Turn Lanes

**TABLE 5.2-12 (Continued)
Impacted Intersections**

No.	INTERSECTION		LOS		CAUSE OF FAILURE	
	N/S Street	E/W Street	AM	PM	AM	PM
35	State St.	G St.	C	F	N/A	NB/SB Volume, No Turn Lanes
36	Union St.	G St.	C	F	N/A	NB/SB Volume, No Turn Lanes
37	Eighth Ave.	G St.	B	F	N/A	SB Volume
38	Park Blvd.	G St.	B	F	N/A	EB Volume, No Turn Lanes
39	13th St.	G St.	B	F	N/A	EB Volume, No Turn Lanes
40	14th St.	G St.	A	F	N/A	Overall Volume, No Turn Lanes
41	16 th St.	G St.	A	F	N/A	EBT Volume
42	17th St.	G St.	A	F	N/A	EB Volume
43	16th St.	Market St.	A	F	N/A	NB Volume
44	19th St.	Market St.	B	F	N/A	NB Volume
45	13th St	Island St.	B	F	N/A	Overall Volumes, No Turn Lanes
46	Eighth Ave.	J St.	F	A	EBL Volume	N/A
47	13th Ave.	J St.	B	F	N/A	Overall Volume, No Turn Lanes
48	19th St.	J St.	B	F	N/A	NB Volume
49	13th St.	K St.	B	F ¹	N/A	Overall Volume, No Turn Lanes
50	14 th St.	K St.	A	F	N/A	Overall Volume, No Turn Lanes
51	16th St.	K St.	E	F	N/A	NB LT Volume
52	13th St.	L St.	F	F	Overall Volumes, No Turn Lanes	Overall Volume, No Turn Lanes
53	16th St.	L St.	F	F	Overall Volume, No Turn Lanes	Overall Volume, No Turn Lanes
54	13th St.	Imperial Ave.	B	F	N/A	NB/SB Volume, No Turn Lanes
55	16th St.	Imperial Ave.	F	F	N/A	Overall Volume, No Turn Lanes
56	19th St.	Imperial Ave.	B	F	N/A	Overall Volume, No Turn Lanes
57	Harbor Dr.	Hawthorn St.	F	C	WB Volume	N/A
58	Pacific Highway	Hawthorn St.	F	C	WB Volume	N/A
59	Kettner Blvd.	Hawthorn St.	F	A	WB Volume	N/A
60	India St.	Hawthorn St.	F	B	WB Volume	N/A
61	Columbia St.	Hawthorn St.	F	C	WB Volume	N/A
62	State St.	Hawthorn St.	F	C	WB Volume	N/A

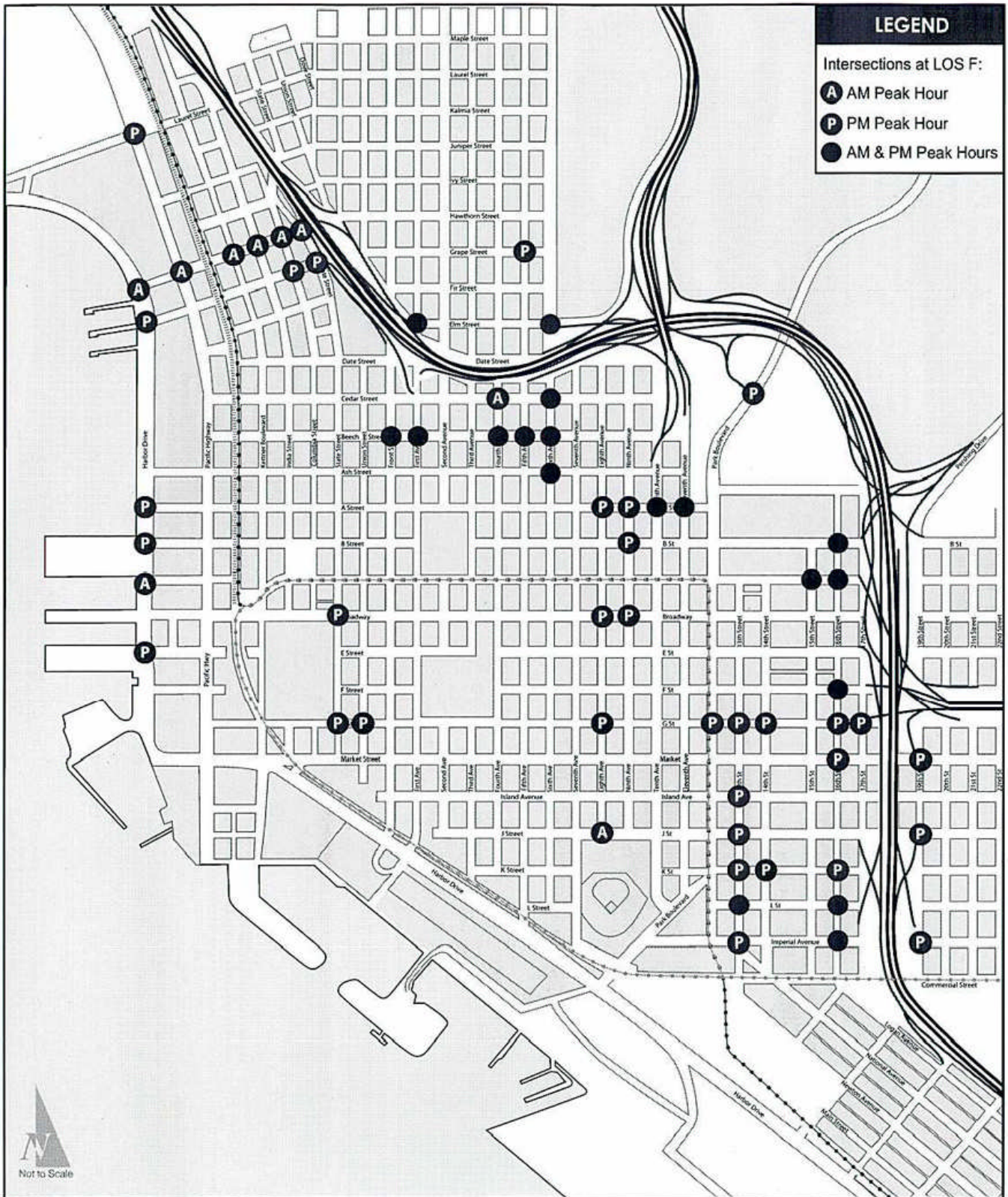
Source: Wilson & Company, 2005

¹ Already operating at LOS F in the existing condition

Notes:

Bold face type indicates significant direct impact.

NB = northbound SB = southbound WB = westbound EB = eastbound RT = right turn LT = left turn T = through
 NBR=northbound right turn SBR=southbound right turn



Source: Wilson and Company, 2005



Impacted Intersections _____ Figure 5.2-5

Impact TRF-A.1.2
Impacts on Surrounding Streets

The increased traffic volumes could result in significant congestion on major streets in the surrounding neighborhoods. Build-out of the proposed Downtown Community Plan will likely cause traffic volumes increases in the adjacent neighborhoods, both east and north of downtown.

Table 5.2-13 displays roadway type, forecast ADT traffic volumes, and resulting roadway Level of Service (LOS) on key arterials to the east and north of downtown under existing and build-out of the proposed Downtown Community Plan. As illustrated in Table 5.2-13, all of the segments which would be at LOS F at Buildout of the proposed Plan are already operating at LOS F. Only the segment of Imperial Avenue, east of 28th Street would change from acceptable LOS E to unacceptable with buildout. Impacts to street segments already operating at LOS F would be cumulatively significant and are discussed in Chapter 6.0.

In addition to roadway segments, the following six intersections in the surrounding communities are identified in Table 5.2-12 as operating at an unacceptable level of service:

- First Avenue and Elm Street;
- Fifth Avenue and Grape Street;
- Sixth Avenue and Elm Street;
- 19th Street and J Street;
- 19th Street and Market Street; and
- 19th Street and Imperial Avenue.

In order to promote traffic flow downtown, the Community Plan establishes the following goals and policies.

Goal 7.1-G-1: Develop street typology based on functional and urban design considerations, emphasizing connections and linkages, pedestrian and cyclist comfort, transit movement and compatibility with adjacent uses.

Goal 7.1-G-2: Maintain, reestablish and enhance the street grid, to promote flexibility of movement, preserve and/or open view corridors, and retain the historic scale of the streets.

Policy 7.1-P-1: Implement the street typology shown in Figure 7-1, ~~in the cross sections~~ and described in Box 7-1 of the Community Plan when carrying out streetscape improvements.

Policy 7.1-P-2: Prohibit and discourage any interruption of the street grid.

Policy 7.1-P-3: Forge new connections and view corridors as larger sites are redeveloped, opening rights of way at the waterfront, through the Civic Center, and along Cedar Street, among others. Require full vehicle and pedestrian access in new connections except where precluded by existing plans and projects.

Table 5.2-13
Proposed Downtown Community Plan Impact on Surrounding Roadways

STREET	SEGMENT	STREET CLASSIFICATION	EXISTING		PROPOSED PLAN	
			Volume	LOS	Volume	LOS
Broadway	East of 19 th Street	4-Lane Major	4,800	A	10,600	A
	East of 25 th Street	4-Lane Major	3,700	A	5,850	A
	East of 28 th Street	4-Lane Major	3,300	A	6,860	A
Market Street	East of 19 th Street	4-Lane Major	10,000	A	14,030	A
	East of 25 th Street	4-Lane Major	7,900	A	15,900	B
	East of 28 th Street	4-Lane Major	8,400	A	16,260	B
Imperial Avenue	East of 19 th Street	2-Lane Collector (With Continuous Left Turn Lane)	6,900	B	11,950	D
	East of 25 th Street	2-Lane Local	8,400	F	12,600	F¹
	East of 28 th Street	2-Lane Collector	6,900	E	10,820	F
Commercial Street	East of 19 th Street	2-Lane Local	1,900	A	6,320	D
	East of 25 th Street	2-Lane Local	1,790	A	2,740	B
	East of 28 th Street	2-Lane Local	1,200	A	1,550	B
National Avenue	South of Imperial Ave	4-Lane Collector	2,500	A	12,100	B
	South of Cesar Chavez Parkway	4-Lane Collector	4,100	A	5,800	A
	South of Sampson Street	4-Lane Collector	9,100	A	11,100	B
Harbor Drive	South of Park Boulevard	4-Lane Major	14,300	A	23,760	C
	South of Cesar Chavez Parkway	4-Lane Major	11,000	A	25,100	C
	South of Sampson Street	4-Lane Major	11,500	A	24,430	C
Cesar Chavez Parkway	North of Harbor Drive	2-Lane Major	8,100	C	11,500	D
	North of National Avenue	4-Lane Major	11,200	A	15,600	B
25 th Street	North of Imperial Avenue	4-Lane Collector	9,200	A	15,100	C
	North of Market Street	4-Lane Collector	11,900	B	15,250	C
	North of Broadway	4-Lane Collector	10,200	B	14,800	C
28 th Street	North of Harbor Drive	2-Lane Local	22,800	F	26,500	F¹
	North of National Avenue	2-Lane Local	7,600	F	8,860	F¹
	North of Imperial Avenue	2-Lane Local	8,400	F	9,880	F¹
	North of Market Street	2-Lane Local	9,100	F	11,750	F¹
	North of Broadway	2-Lane Local	9,900	F	12,500	F¹
Pershing Drive	North of Florida Drive	4-Lane Major	8,500	A	11,840	A
Florida Drive	North of Pershing Drive	4-Lane Major	22,900	C	32,300	D

¹ Already operating at LOS F in the existing condition

Note: Bold face type indicates significant direct impact

Source: Wilson & Company, July 2005

In addition, the Community Plan encourages Transportation Demand Management to reduce reliance on the automobile. Related goals and policies include:

- Goal 7.5-G-1: Encourage transportation demand management strategies to minimize traffic contributions from new and existing development.
- Goal 7.5-G-2: Cooperate with regional transportation planning and demand management programs, and with local agencies for joint use arrangements of transportation and parking facilities during evenings, weekends, and holidays.
- Policy 7.4-P-1: Encourage TDM approaches and various SANDAG programs to:
 - Rideshare and carpool in all levels of government with offices and facilities downtown as well as other major downtown employers.
 - Make available designated preferential, conveniently located car/vanpool parking areas.
 - Provide transit reimbursement and other benefits to other users of non-motorized travel.
 - Establish a car/vanpool matching service that could use mechanisms such as sign-ups at individual buildings, or via electronic mail or internet website.
 - Continue SANDAG’s guaranteed ride home for workers who carpool.
 - Work with public and private entities to encourage car share programs in downtown.
 - Provide flextime and telecommuting opportunities to employees.

In addition, the Section 103.1911(n) of the proposed PDO establishes incentives for commercial and hotel uses to implement TDM measures.

5.2.3.4 Freeway System Impact

Impact TRF-A.2.1
Impact on Freeways

Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps.

Freeway Segments

Due to these high traffic volumes, all nine freeway segments in the downtown study area would operate at substandard LOS F under buildout of the Community Plan during either the AM and/or PM peak hours (Table 5.2-14). As indicated earlier, three of these segments are already operating at LOS F in one or both of the peak hours. Impacts to these segments are considered cumulatively significant as discussed in Chapter 6.0.

**TABLE 5.2-14
Freeway Segment Peak Hour LOS at Buildout**

FACILITY	SEGMENT		DAILY ADT	RAMP DIRECTION	LOS	
	FROM	TO			AM	PM
I-5	SR-75	J St.	249,600	NB	F	D
				SB	C	F
	J St.	SR-94	248,000	NB	F	D
				SB	C	F
	SR-94	Pershing Dr.	265,000	NB	F	D
				SB	D	F ¹
	Pershing Dr.	SR-163	295,700	NB	F	E
				SB	F	F ¹
	SR-163	Sixth Ave.	291,000	NB	F	E
				SB	C	F
	Sixth Ave.	First Ave.	308,400	NB	F	F
				SB	E	F
	First Ave.	Hawthorne St.	254,600	NB	F	F
				SB	F	F
SR-163	I-5	Washington St.	131,100	NB	C	F ¹
				SB	F ¹	D
SR-94	17 th St.	28 th St.	153,600	NB	A	F
				SB	F	B

1 Already operating at LOS F in the existing condition

Source: SANDAG; Wilson & Company; July 2005

Freeway Ramps

As shown in Table 5.2-15 and Figure 5.2-6, eight on-ramps would operate at substandard LOS F under buildout of the proposed Community Plan during the AM and/or PM peak hours. Four of these on-ramps are currently operating at LOS F. Impacts to these segments are considered cumulatively significant as discussed in Chapter 6.0.

As illustrated in Table 5.2-15, six off-ramps would operate at substandard LOS F under buildout of the proposed Community Plan during the AM and/or PM peak hours. Of these, the off-ramp (I-5 at Cedar Street) currently operates as LOS F but is assumed to be eliminated at buildout in accordance with the proposed Community Plan.

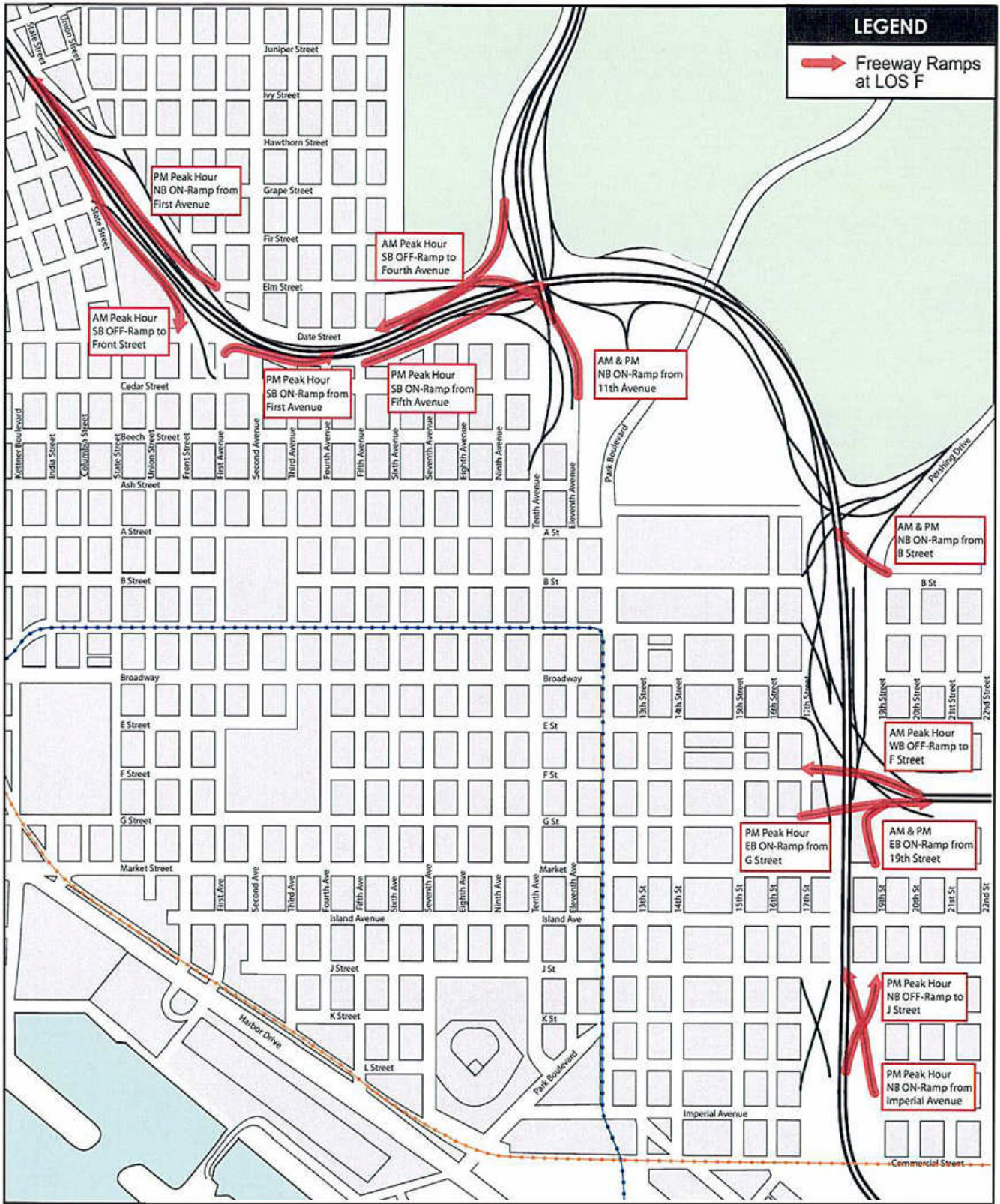
**TABLE 5.2-15
Freeway Ramp Peak Hour LOS at Buildout**

	RAMP		VOLUME/ CAPACITY RATIO		LOS	
	FROM	TO	AM	PM	AM	PM
NB On-Ramps	19 th St.	NB I-5	0.75	1.08	C	F
	B St.	NB I-5	1.39	1.42	F ¹	F
	11 th Ave.	NB I-5 / NB SR-163	1.93	1.76	F ¹	F ¹
	First Ave.	NB I-5	2.63	2.58	F	F ¹
SB On-Ramps	Grape St.	SB I-5	1.67	3.39	F	F ¹
	First Ave.	SB I-5	1.00	1.33	E	F
	Fifth Ave.	SB I-5	0.58	1.33	B	F
	Park Blvd.	SB I-5	0.47	0.79	B	C
	C St.	SB I-5	0.80	0.85	C	D
	E St.	SB I-5	0.77	0.89	C	D
	J St.	SB I-5	0.77	0.58	C	B
EB On-Ramps	G St.	EB SR-94	0.29	1.11	A	F
	19 th St.	EB SR-94	1.02	2.27	F	F
NB Off-Ramps	NB I-5	J St.	0.92	2.48	D	F
	NB I-5	B St.	0.55	1.00	B	E
	NB I-5	Sixth Ave.	0.91	1.00	D	E
SB Off-Ramps	SB I-5	Cedar St.	NA ¹	NA ¹	NA ²	NA ²
	SB I-5	Front St.	1.78	0.97	F	E
	SB I-5/SB SR-163	Tenth Ave.	0.97	0.97	E	E
	SB I-5	B St.	0.81	0.46	C	B
	SB I-5	17 th St.	0.90	0.89	D	D
	SR-163	Fourth Ave.	1.04	0.92	F	D
	SR-163	Ash St.	0.95	0.92	E	D
	SR-163	Park Blvd.	0.66	0.42	C	B
WB Off Ramps	SR-94	F St.	1.14	0.81	F	D

¹ Already operating at LOS F in the existing condition.

² Levels of Service are not available because the model assumed elimination of this ramp at buildout.

Source: SANDAG, 2005; Wilson & Company



Source: Wilson and Company, 2005

Impacted Freeway Ramp Segments _____ Figure 5.2-6

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The increase in residential development in the downtown area as currently occurring and as will further occur under the proposed Downtown Community Plan has the potential to increase the “reverse commute”. The normal commute is characterized by the downtown serving as an employment center with workers commuting from outlying suburban residential land uses. Under this scenario, the work/peak hour commute is inbound to the downtown in the morning and outbound in the evening. With increased downtown residential development, outbound trips from the downtown in the morning and inbound in the evening are anticipated to increase, a reverse of the normal commuting pattern. Implications from a transportation perspective include increased demands on traditionally non-peak directional transit routes (e.g. northbound Coaster in the AM and southbound in the PM) and increasing demands on freeway on-/off-ramps (downtown freeway on-ramps in the AM and downtown off-ramps in the PM.). The overall effects of an increasing reverse commute will be beneficial in balancing peak hour demands on key freeway ramps serving the downtown.

In order to promote solutions for freeway congestion, the following policy is included in the proposed Community Plan:

Policy 7.1-P-4: Work with appropriate transportation agencies to implement freeway improvements in and near downtown.

Impact TRF-A.2.2

Elimination of Cedar Street Off-ramp

Elimination of the Cedar Street off-ramp could adversely impact the freeway system and connecting surface streets. As noted, one of the street modifications proposed by the Downtown Community Plan is the closure of the southbound I-5 off-ramp to Cedar Street and conversion of

Cedar Street to two-way traffic. Closure of the Cedar Street I-5 freeway off-ramp would cause an overall increase in traffic on other off-ramps serving the downtown area, particularly the off-ramp at Front Street and Tenth Avenue. Since a number of these ramps are projected to operate at substandard LOS F under build-out of proposed Downtown Community Plan, and since the closure of the Cedar Street off-ramp will cause additional use of these identified substandard ramps, the closure of the Cedar Street off-ramp from southbound I-5 is also identified as a direct project-related significant impact.

Table 5.2-16 displays analysis of the metered freeway on-ramps under buildout of the proposed Downtown Community Plan. It was assumed that all freeway on-ramps would be metered under future buildout conditions. All of the metered ramps would be operating at an unacceptable amount of delay (over 15 minutes) in the AM and/or PM peak hours.

Traffic queues at these ramps would likely extend beyond the on-ramps themselves and potentially impact traffic operations at nearby intersections.

5.2.3.5 Transit Impacts

As indicated in Table 5.2-17, 24% of all work trips would be expected to use transit; a total of 6% of all daily person trips would utilize transit. The total daily ridership would represent an increase of about 98,000 transit trips or 185% over existing conditions. The total work trips would represent an increase of about 130% when compared with existing conditions.

**TABLE 5.2-16
I-5 Metered On-Ramp Conditions At Buildout**

FACILITY		DELAY (MINUTES)	
FROM	To	AM	PM
19 th St.	NB I-5	<15	>25
B St.	NB I-5	<15	>25
Eleventh Ave.	NB I-5	15 - 25	15 - 25
Eleventh Ave.	NB SR-163	15 - 25	15 - 25
First Ave.	NB I-5	>25	>25
Grape St.	SB I-5	>25	>25
First Ave.	SB I-5	>25	15 - 25
Fifth Ave.	SB I-5	0	15 - 25
Park Blvd.	SB I-5	0	0
C St.	SB I-5	15-25	15 - 25
E St.	SB I-5	<15	15 - 25
J St.	SB I-5	<15	0
19 th St.	EB SR-94	15 - 25	>25
G St.	EB SR-94	>25	0

Bold face type indicates unacceptable level of delay.

Source: Wilson & Company; 2005

**TABLE 5.2-17
Projected Transit Ridership Proposed Community Plan**

TRIP PURPOSE	TRANSIT TRIPS	TOTAL PERSON TRIPS	TRANSIT MODE SHARE
Work	64,300	265,800	24.2%
Total	151,600	2,706,000	5.6%

Source: SANDAG, February 2005

Although development of downtown under the proposed Community Plan would increase the demand for transit service including the Trolley and bus service, SANDAG, which is responsible for long-range planning for transit, indicates that existing and planned transit services would have the capacity to meet the increase demand. In addition, the Community Plan contains goals and policies which would promote adequate transit service including:

- Goal 7.3-G-1: Provide land uses to support a flexible, fast, frequent, and safe transit system that provides connections within downtown and beyond.

Goal 7.3-G-2:	Increase transit use among downtown residents, workers, and visitors.
Policy 7.3-P-1:	Locate the highest intensity of development in or near trolley corridors to maximize adjacency of people, activity, and transit accessibility.
Policy 7.3-P-2:	Work with other agencies to support planned street improvements to accommodate transit.
Policy 7.3-P-3:	Coordinate with the transit agency and other appropriate organizations to implement: <ul style="list-style-type: none"> • Internal shuttle service for local trips, connecting key downtown locations with the wider transit network, and using smaller, cleaner vehicles for flexible neighborhood trips. • BRT service, improving the commuter and long-distance transit network with state-of-the-art technology to provide more frequent and faster trips. • Bus service modifications to improve service, and to increase transit accessibility when the internal shuttle and BRT services begin.
Policy 7.3-P-5:	Enhance streetscapes within transit corridors to increase attractiveness for users and promote shared transit, pedestrian, and cyclist use.
Policy 7.3-P-6:	Encourage SANDAG to develop real time information and signage systems for all downtown transit options.
Policy 7.3-P-7:	Coordinate transit station design with the transit agency to ensure inviting, enjoyable places, with shade, public art, landscaping, and memorable design features reflective of the surrounding environment.
Policy 7.3-P-8:	Cooperate with the transit agency on public programs and campaigns to increase transit agency on public programs and campaigns to increase transit use for various types of trips – work, shopping, entertainment, etc.
Policy 7.3-P-9:	Coordinate with regional rail and transit planners to monitor intra-city passenger and freight concepts and potential impacts on downtown.

5.2.3.5 Non-Motorized Circulation and Access Facilities

With growth and development of downtown, pedestrian and bicycle activity would greatly increase throughout the entire downtown area. The additional residential development would provide for greater activity throughout all hours of the day in many areas of the downtown currently lacking such activity.

Table 5.2-18 displays projected non-motorized (walk, bicycle and pedicab) trips in the downtown area under buildout of the proposed Community Plan. Non-motorized trips would represent over 20% of all trips, compared to 15% under existing conditions.

**TABLE 5.2-18
Projected Non-Motorized Trips Proposed
Community Plan Buildout Conditions**

TRIP PURPOSE	NON-MOTORIZED TRIPS	TOTAL PERSON TRIPS	NON-MOTORIZED MODE SHARE
Work	36,700	265,800	13.8%
Total	563,400	2,706,000	20.8%

Source: SANDAG, February 2005

Although sidewalks and signal timing would be designed in accordance with City of San Diego standards to safely accommodate pedestrian activities, the re-striping of additional travel lanes would in many cases create an undesirable walking and biking environment which could discourage use of non-motorized forms of transportation. For example, a crosswalk having to traverse any of the following roadway conditions could adversely affect pedestrians:

- More than four lanes at any intersection (excepting boulevards);
- More than two travel lanes on residential streets, or pedestrian crossings in roadways with more than three lanes;
- More than three travel lanes on multi-function streets, or pedestrian crossings in roadways with more than three travel lanes; or
- Dual right-turn lanes.

Intersection design techniques can be used to reduce the adverse impact on pedestrian and bicycle activities. Examples include: prohibiting right turns on red lights, signage and creating “bulbs” at intersections to reduce the distance pedestrians must travel to cross streets. In addition, the proposed Plan includes a variety of aspects designed to accommodate pedestrian and bicycle activities. Pedestrian Priority Zones are identified where a variety of land use types (neighborhood centers, Main Streets, the Civic/core, and areas around major transit stops) are likely to have increased concentrations of pedestrians. Other key pedestrian features of the proposed Community Plan include:

- Enhanced sidewalks along Broadway;
- Improvement of C Street;
- Reinforcement of the role of Park Boulevard as a key pedestrian link; and
- Provide a pedestrian connection through the civic center on B Street between First and Third Avenues.

The proposed Community Plan includes the following goals and policies relating to pedestrian and bicycle travel:

- Goal 7.2-G-1: Develop a cohesive and attractive walking and bicycle system within downtown that provides links within the area and to surrounding neighborhoods.
- Goal 7.2-G-2: Facilitate development of mixed-use neighborhoods, with open spaces, services, and retail within convenient walking distance of residents, to maximize opportunities for walking.
- Policy 7.2-P-1: Create the system of bike facilities shown in Figure 7-1 of the Community Plan, and encourage regional links such as the San Diego Bayshore Bikeway.
- Policy 7.2-P-2: Use traffic-calming measures to control speeds on all freeway couplets—First/Second Avenues, Tenth/Eleventh Avenues, F/G Streets, Fourth/Fifth Avenues— while optimizing traffic volumes during peak hour.
- Policy 7.2-P-3: Require bike racks and locking systems in all residential projects, multi-tenant retail and office projects, and government and institutional uses.
- Policy 7.2-P-4: In Pedestrian Priority Zones;
- Undertake strategic streetscape improvements (such as sidewalk widening, bulbouts, enhanced lighting and signage);
 - Lengthen traffic signal walk times for pedestrians, and explore feasibility of “all walk” signalization at intersections with heavy pedestrian flow; and
 - Accept lower levels of automobile traffic level of service.

5.2.3.7 Parking

Predicting the number of parking spaces that will be available at buildout is difficult because of the number of related variables. One important variable is the number of public surface parking lots expected as buildout occurs. It is assumed that most of the existing surface parking lots would be displaced by development.

The number of private parking spaces that would be ultimately provided by future development represents another variable. Although ~~Section 103.1911 of~~ the proposed PDO would establish minimum parking ratios for new development, these ratios would not satisfy the total demand for parking spaces. For example, office uses generate a demand in excess of 2.1 spaces per 1,000 square feet while the PDO would only require parking at a ratio of 1.5 spaces per 1,000 square feet. Also, residential occupants often have more than one car. On the other hand, it is possible that some developers may choose to exceed the minimum parking requirements.

A third variable relates to the number of public parking garages that the private and/or public sector may construct to meet parking demand downtown. Such facilities have already been constructed downtown. Examples of private facilities include the Parking Palace; public facilities include “Park-It-On-Market”, ~~Columbia Street Parking Garage~~, Padres Parkade and the Community Concourse garage.

As shown in Table 5.2-19 the total estimated parking demand generated by the future downtown growth as envisioned by the proposed Plan is estimated at approximately 100,445 spaces. This is over and above the estimated current demand of 57,824 spaces, and results in a total downtown parking demand of 158,269 spaces.

**TABLE 5.2-19
Parking Demand vs. Supply at Buildout**

LAND USE	PLANNED GROWTH	PARKING PURSUANT TO PDO		ANTICIPATED DEMAND ¹	PARKING SHORTFALL
		RATIO	SUPPLY		
Office	16,677,000	1.5 space/1,000 sf	22,514 ²	35,022	-12,508
Retail	3,412,000	1.0 space/1,000 sf	682 ³	7,848	-7,166
Hotel	11,200	0.3 spaces/room	3,360	5,600	-2,240
Residential	38,500	1.0 space/unit	38,500	51,975	-13,475
		Future	65,056	100,445	-35,389
		Existing	56,880	57,824	-944
		Future + Existing	121,936	158,269	-36,333

¹ Based on demand ratios from Table 5.2-7.

² Office development less than 50,000 square feet would be excluded which is estimate to represent about 10% of total.

³ Retail development less than 30,000 square feet would be excluded which is estimate to represent about 80% of total.

Source: Wilson & Company, July 2005

The proposed PDO parking requirements would result in an estimated additional 65,056 parking spaces with future downtown growth and development. This compares with an estimated future growth related demand of 100,445 spaces, resulting in an estimated shortfall of 35,389 spaces or about 35%.

In order to promote adequate parking, the proposed Plan identifies the following goals and policies relating to parking:

- Goal 7.4-G-1: Promote quality of life and business viability by allowing the provision of parking to serve growing needs, while avoiding excessive supplies that discourage transit ridership and disrupt urban fabric.
- Goal 7.4-G-2: Site and design new parking structures to accommodate parking needs from multiple land uses to the extent possible and allow shared parking where possible.
- Goal 7.4-G-3: Distribute new public garages throughout downtown, in locations contributing to efficient circulation, and convenient and proximate to eventual destinations.
- Policy 7.4-P-1: Require a certain portion of on-site motorcycle and bicycle parking in addition to automobile spaces.

- Policy 7.4-P-2: Emphasize shared parking approaches, including:
- Development of parking facilities that serve multiple uses, to enable efficient use of space over the course of the day;
 - Parking under new parks that are full-block or larger in size, where not limited by geologic or other constraints; and
 - Enhanced on-street parking through restriping streets where appropriate.
- Policy 7.4-P-3: Allow off-site and/or shared parking arrangements where appropriate to maximize efficient use of parking resources.
- Policy 7.4-P-4: Work with developers of high-intensity developments unable to accommodate parking on site to allow development/use of parking under public parks, where appropriate and feasible.
- Policy 7.4-P-5: Work with the Port to provide public parking in the Waterfront/Marina area, and with the City, County and other agencies in Civic/Core.
- Policy 7.4-P-6: Ensure that all public parking structures maximize the potential for subterranean parking and incorporate other uses at higher floors where feasible. Explore the use of technological advancements to improve cost/parking efficiencies in new public garages.
- Policy 7.4-P-7: Maximize the efficiency of street parking by managing metered time limits to correspond with daily activity patterns.

Impact TRF-D.1
Excessive Parking
Demand

Buildout of downtown could create a significant parking impact due to the potential for demand to exceed supply. As noted earlier, parking ratios established by the PDO would be inadequate to assure that the full demand for parking created by new development is met. In addition, there

is no guarantee that private or public parking structures would be provided to meet the unfulfilled demand.

The potential for parking shortages in the downtown, as previously noted, could result in additional parking in the adjacent neighborhoods, both east and north of I-5. Currently, parking in the adjacent neighborhoods occurs, for the most part, by parkers desiring to avoid the costs of parking in the more central downtown core areas. This generally requires an extensive walk to the primary destinations, which tends to discourage this behavior for all but for a minority of downtown parkers. In the future and with the identified potential for parking shortages in the downtown area, a greater share of parkers could seek parking in the adjacent neighborhoods due to parking supply shortages as well as economic reasons.

The extent of parking in the adjacent neighborhoods will be a function of both the cost and availability of downtown parking as well as the specific uses developed in the adjacent sections of the downtown area. A number of public and private actions may be taken to reduce or avoid the potential parking shortages, but since these actions cannot be assured at this point in time, the

potential for downtown parking shortages is considered a potentially significant impact. In a similar manner, although the extent and magnitude of parking in the adjacent neighborhoods that would occur with build-out of the proposed Downtown Community Plan is difficult estimate, the potential exists, and is therefore identified as a significant project-related impact.

5.2.4 MITIGATION MEASURES

Impact TRF-A.1.1 Impact on Grid Streets

In addition to the roadway segment changes included in the proposed Community Plan, as indicated in Table 5.2-20, a variety of intersection improvements are available to reduce impacts to the grid streets; each of these improvements in comparison with the existing condition are schematically represented in Appendix C of the traffic study. The traffic study identified these potential improvements in an effort to determine the likelihood that the downtown grid could handle buildout traffic. As indicated Table 5.2-20, the preliminary conclusion is that intersection improvements can be accommodated within existing rights of ways to maintain an acceptable level of service on all but possibly 12. However, it should be noted that final design would be required at each of the intersections to determine the appropriateness and feasibility of improvements designed to accommodate anticipated traffic. Furthermore, the traffic consequences of implementing these improvements should be considered prior to implementation. In addition, as indicated earlier, conflicts with pedestrian/bicycle activities could affect the feasibility and/or desirability of proposed intersection improvements.

Based on the preliminary evaluation completed for Table 5.2-20, the following intersections could operate at an unacceptable level of service in the buildout condition due to constraints (e.g. insufficient right of way or pedestrian limitations) associated with implementing potential improvements for those intersections~~the absence of feasible mitigation measures~~ (see Figure 5.2-7):

- Columbia Street/Grape Street;
- Sixth Avenue/Cedar Street (assuming conversion of Sixth Avenue to two-way street);
- First Avenue/Beech Street;
- Sixth Avenue/Beech Street (assuming conversion of Sixth Avenue to two-way street);
- Sixth Avenue/Ash Street (assuming conversion of Sixth Avenue to two-way street);
- Ninth Avenue/A Street;
- Tenth Avenue/A Street;
- Eleventh Avenue/A Street;
- 15th Street/F Street;
- 16th Street/F Street;
- 13th Street/G Street; and
- Pacific Highway/Hawthorn Street.

**TABLE 5.2-20
Potential Intersection Improvements**

INTERSECTION			LOS		REQUIRED MITIGATION	FEASIBLE?
NO.	N/S STREET	E/W STREET	AM	PM		
1	Pacific Highway	Laurel St	E	F	Separate NB RT	Y
2	Harbor Dr	Grape St	B	F	Add NB Shared Thru-Right	Y
3	Columbia St	Grape St	B	F	Add EB T; Separate EB RT	N
4	State St	Grape St	A	F	Add EB T	Y
5	Fifth Ave	Grape St	A	F	Separate EB LT	Y
6	First Ave	Elm St	F	F	Convert NB Thru-Left to NB left only	Y
7	Sixth Ave	Elm St	F	F	Provide 2 WB LT, 2 WB Thru, 1 WB RT; Provide NB/SB @ 2 Lanes with Shared Turns	Y
8	Fourth Ave	Cedar St	F	D	Add SB LT, WB LT	Y
9	Sixth Ave	Cedar St	F	F	Separate WB LT and EB LT; Provide NB @ 2 Thru Lanes w/Shared Turns; Provide SB LT, 2 SB Thru, SB RT	N ¹
10	Park Blvd	I-5 SB On/Off	C	F	Add NB LT	Y
11	Front St	Beech St	F	F	Add SB T, WB T, EB T	Y
12	Front St	Ash St	F	B	Add SB RT	Y
13	First Ave	Beech St	F	F	Add NB T, WB T, EB T; Separate NB RT	N
14	Fourth Ave	Beech St	F	F	Add WB T, EB T	Y
15	Fifth Ave	Beech St	F	F	Add WB T, EB T	Y
16	Sixth Ave	Beech St	F	F	Add WB T, EB T; Provide NB @ 2 Lanes w/Shared Turns; Provide SB @ 2 Thru Lanes w/Shared Left and Separate Right	N ¹
17	Sixth Ave	Ash St	F	F	Provide 2 SB RT and 2 SB T	N ¹
18	Harbor Dr	A St	B	F	Provide SB LT	Y
19	Eighth Ave	A St	A	F	Add SB LT	Y
20	Ninth Ave	A St	A	F	Separate EB LT; Provide 2 NB T, NB Thru-right, NB RT	N
21	10 th Ave	A St	F	F	Add 2 EB T, Separate EB RT; Add SB T, Separate SB LT	N
22	11 th Ave	A St	F	F	Separate EB LT; Add NB T, Separate NB RT	N
23	Harbor Dr	B St	B	F	Provide SB LT	Y
24	Harbor Dr	C St	F	C	Provide SB LT	Y

**TABLE 5.2-20 (Continued)
Potential Intersection Improvements**

INTERSECTION			LOS		REQUIRED MITIGATION	FEASIBLE?
NO.	N/S STREET	E/W STREET	AM	PM		
25	Ninth Ave.	B St.	B	F	Provide 3 NB T w/ Shared Left	Y
26	16 th St.	B St.	F	F	Separate NB LT; Add WB T, Separate WB LT	Y
27	15 th St.	C St.	F	F	Provide 2 EB T w/Shared Turns	Y
28	16 th St.	C St.	F	F	Provide 2 EB T w/Shared Right, Separate EB LT, WB LT; Add NB T, Separate NB LT, SB LT	Y
29	State St.	Broadway	D	F	Separate NB LT	Y
30	Eighth Ave.	Broadway	B	F	Provide 3 SB T w/ Shared Turns	Y
31	Ninth Ave.	Broadway	A	F	Provide 3 NB T w/ Shared Turns	Y
32	Harbor Dr.	E St.	C	F	Provide SB LT	Y
33	15 th St.	F St.	F	B	Separate WB LT, WB RT	N
34	16 th St.	F St.	F	F	Separate NB LT, SB LT; Add WB T, Separate WB LT, WB RT	N
35	State St.	G St.	C	F	Separate NB LT, SB LT	Y
36	Union St.	G St.	C	F	Separate NB LT, SB LT	Y
37	Eighth Ave.	G St.	B	F	Add SB T	Y
38	Park Blvd.	G St.	B	F	Add EB T	Y
39	13 th St.	G St.	B	F	Add EB T, Separate EB LT; SB LT	N
40	14 th St.	G St.	A	F	Add EB T; Separate SB LT, NB RT	Y
41	16 th St.	G St.	A	F	Add EB T	Y
42	17 th St.	G St.	A	F	Add EB T	Y
43	16 th St.	Market St.	A	F	Separate NB LT, NB RT	Y
44	19 th St.	Market St.	B	F	Convert NB LT to Shared NB Thru-Left	Y
45	13 th St.	Island St.	B	F	Separate NB LT, SB LT	Y
46	Eighth Ave.	J St.	F	A	Separate EB LT	Y
47	13 th St.	J St.	B	F	Separate SB LT, NB LT	Y
48	19 th St.	J St.	B	F	Add NB T	Y
49	13 th St.	K St.	B	F	Separate SB LT, NB LT	Y

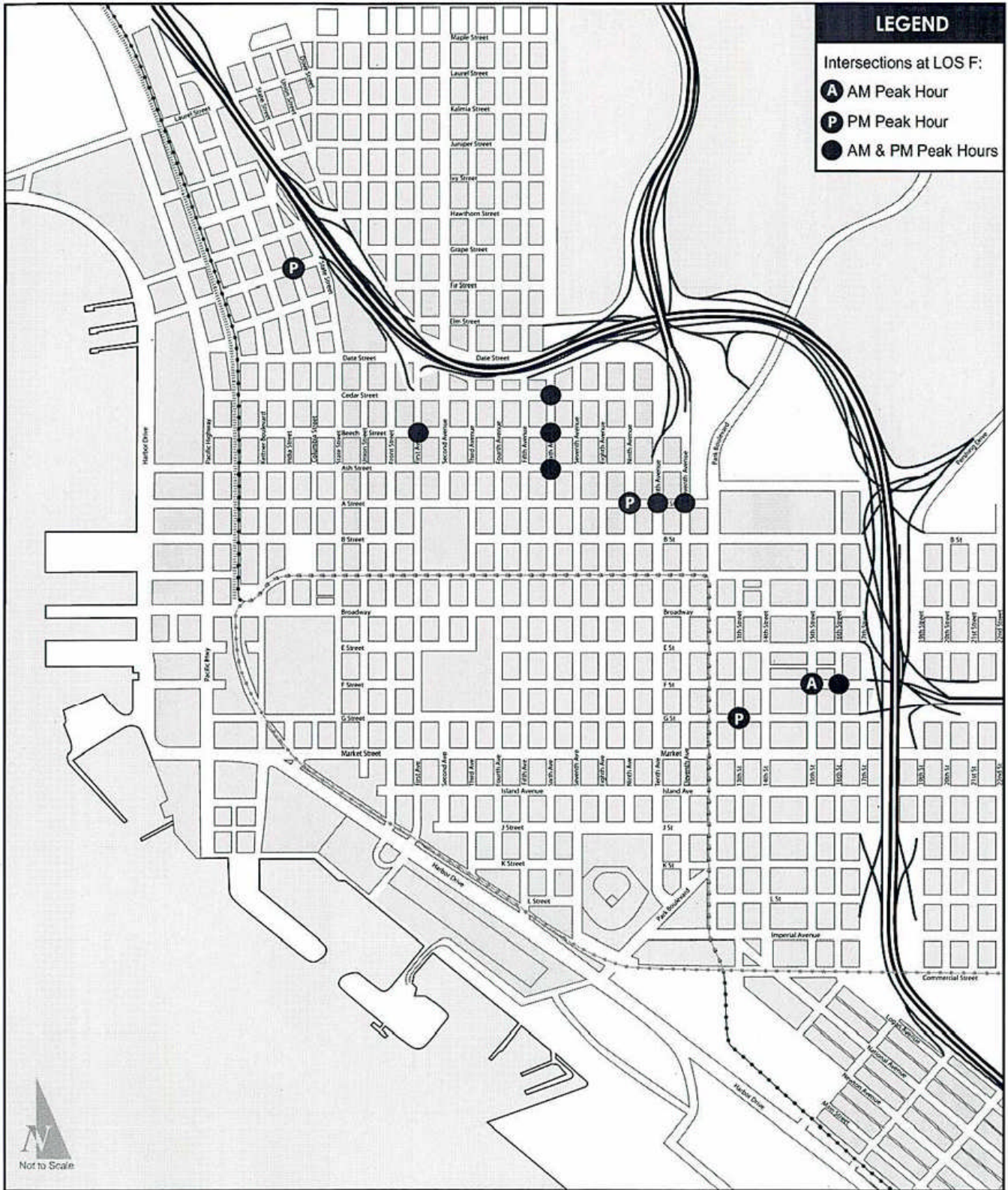
TABLE 5.2-20 (Continued)
Potential Intersection Improvements

INTERSECTION			LOS		REQUIRED MITIGATION	FEASIBLE?
NO.	N/S STREET	E/W STREET	AM	PM		
50	14 th St.	K St.	A	F	Separate EB LT, WB LT, SB LT, NB LT	Y
51	16 th St.	K St.	E	F	Separate SB LT, NB LT	Y
52	13 th St.	L St.	F	F	Provide 2 NB T, NB RT; Provide EB LT, EB RT, Provide SB Thru-Left	Y
53	16 th St.	L St.	F	F	Separate EB LT, WB LT, SB LT, NB LT	Y
54	13 th St.	Imperial Ave.	B	F	Provide NB LT, NB T, NB Thru-Right; Provide SB LT, SB T, SB Thru-Right	Y
55	16 th St.	Imperial Ave.	F	F	Separate NB LT, SB LT	Y
56	19 th St.	Imperial Ave.	B	F	Separate EB LT, Add EB LT	Y
57	Harbor Dr.	Hawthorn St.	F	C	Add Shared WB Left-Right	Y
58	Pacific Highway	Hawthorn St.	F	C	Add WB T, Separate WB LT	N
59	Kettner Blvd.	Hawthorn St.	F	A	Add WB T	Y
60	India St.	Hawthorn St.	F	B	Add WB T	Y
61	Columbia St.	Hawthorn St.	F	C	Add WB T	Y
62	State St.	Hawthorn St.	F	C	Add WB T	Y

¹ These intersections would only be unmitigated if Sixth Avenue is converted to a two-way street between Ash and Elm Streets, as contemplated in an earlier version of the proposed Community Plan. This proposal is no longer included in the current proposed Community Plan.

Source: Wilson & Company, March 2005

Note: NB = northbound SB = southbound WB = westbound EB = eastbound
RT = right turn LT = left turn T = through



Source: Wilson and Company, 2005



Unmitigable Intersections _____ Figure 5.2-7

It should be noted that the earlier version of the proposed Community Plan, upon which the traffic study was based, anticipated converting Sixth Avenue from a one-way to a two-way street between Ash and Elm streets. The current version of the proposed Community Plan is no longer proposing this change due to the adverse impacts identified during the traffic study. Assuming that Sixth Avenue would remain a one-way street between Elm and Ash streets, the unmitigable impacts identified in Table 5.2-20 at the intersections of Sixth Avenue with Ash, Beech and Cedar streets would be eliminated. Thus, under the current proposed Plan, up to nine intersections impacted at buildout are expected to be unavoidably impacted.

The timing associated with implementation of improvements identified in Tables 5.2-20 and 21 is difficult to predict at the programmatic level. In order to determine when improvements are required and the appropriate design of the improvements, the following mitigation measure would be implemented.

Mitigation Measure TRF-A.1.1-1: At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall conduct a downtown-wide evaluation of the ability of the grid street system to accommodate traffic within downtown as well as the following roadway segment in the surrounding neighborhood: Imperial Avenue (between 25th Street and of 28th Street). The need for roadway improvements shall be based upon standards established by CCDC, in cooperation with the City Engineer. In completing these studies, the potential improvements identified in Appendix C of the traffic study and Tables 5.2-20 and 21 of the EIR will be reviewed to determine whether these or other actions are required to improve traffic flow along affected roadway corridors. As necessary, potential improvements shall also be determined for the identified roadway segments within the surrounding neighborhoods. In selecting improvements, CCDC shall review the effect the improvement may have on pedestrian or bicycle activities whenever pedestrians must traverse any of the following roadway conditions:

- Five or more lanes at any intersection (excepting Boulevards);
- Three or more travel lanes on residential streets, or crossing roadways with four or more lanes;
- Four or more travel lanes on multi-function streets, or crossing roadways with four or more travel lanes; or
- Dual right-turn lanes.

Following the completion of each five-year monitoring event, CCDC shall incorporate needed roadway improvements into its Capital Improvement Program (CIP) or identify another implementation strategy.

In order to determine if the roadway improvements included in the current five-year CIP, or the equivalent, are sufficient to accommodate developments, a traffic study would be required for large projects. The threshold to be used for determining the need for a traffic study shall reflect the traffic volume threshold used in the Congestion Management Program (CMP). The CMP stipulates that any activity forecasted to generate 2,400 or more daily trips (200 or more equivalent peak hour trips).

**TABLE 5.2-21
Potential Roadway Segment Improvements**

ROADWAY	FROM	TO	EXISTING	PROPOSED PLAN	POTENTIAL MODIFICATION
Grape St.	Harbor Dr.	State St.	3-lane EB 1-way, with parking	No Change	4-lane EB 1-way, no parking
Hawthorn St.	Harbor Dr.	State St.	3-lane WB 1-way, with parking	No Change	4-lanes WB 1-way, no parking
Cedar St.	Fourth Ave.	Sixth Ave.	Mostly One-way, 2 and 3 lanes, with one two-way section	2-lane 2-way, with parking; Removal of the southbound off-ramp from I-5	2-lane 2-way, with continuous left turn lane and parking; removal of southbound off-ramp from I-5
Beech St.	Front St.	Sixth Ave.	2-lane 2-way, with parking	No Change	4-lanes 2-way, no parking
C St.	Park Blvd.	I-5	3-lane EB 1-way, with parking	2-lane 2-way, with parking	3-lane 2-way (2-lane EB, 1-lane WB), with parking
G St.	Park Blvd.	17th St.	3-lane EB 1-way, with parking	No Change	4-lane EB 1-way, no parking, during peak periods
Imperial Ave.	Park Blvd.	19 th St.	4-lane 2-way, no parking	No Change	4-lane 2-way, with continuous left turn lane, no parking
Fifth Ave.	Elm St.	Ash St.	3-lane NB 1-way, with parking	No Change	4-lane NB 1-way, no parking, during peak periods
Sixth Ave.	Elm St.	Ash St.	3-lane SB 1-way, with parking	2-lane 2-way, with parking [†] <u>No Change</u>	3-lane SB 1-way, with parking
Eighth Ave.	Ash St.	G St.	3-lane SB 1-way, with parking	2-lane 1-way SB, with parking <u>No Change</u>	3-lane 1-way SB, with parking
Ninth Ave.	Ash St.	Market St.	3-lane NB 1-way, with parking	2-lane 1-way NB, with parking <u>No Change</u>	3-lane 1-way NB, with parking
19 th St.	Imperial Ave.	SR-94	2-3 lanes 1-way NB	No Change	3-lane NB 1-way, with parking

[†]-This change is no longer contained in the proposed Community Plan.

Source: Wilson & Company, 2005

TABLE 5.2-21
Proposed Roadway Segment Improvements

<u>ROADWAY</u>	<u>SEGMENT</u>	<u>PROPOSED IMPROVEMENT</u>
<u>Grape Street</u>	<u>Harbor Dr. to State Street</u>	<u>4-lane EB 1-way, no parking</u>
<u>Hawthorn Street</u>	<u>Harbor Dr. to State Street</u>	<u>4-lane WB 1-way, no parking</u>
<u>Cedar Street¹</u>	<u>Fourth Avenue to Sixth Avenue</u>	<u>2-lane, 2-way, with continuous left turn lane and parking; removal of southbound off-ramp from I-5</u>
<u>Cedar Street¹</u>	<u>Front Street to Fifth Avenue</u>	<u>Two-way, 2 lanes and removal of the off-ramp from I-5</u>
<u>Beech Street</u>	<u>Front Street to Sixth Avenue</u>	<u>4-lane, 2-way, no parking</u>
<u>A Street</u>	<u>Harbor Dr. to Pacific Highway</u>	<u>Two-way, 2-lane</u>
<u>B Street</u>	<u>Harbor Dr. to Pacific Highway</u>	<u>Two-way, 2-lane</u>
<u>C Street¹</u>	<u>Park Blvd. to I-5</u>	<u>3-lane, 2-way (2 lane EB, 1 lane WB), with parking</u>
<u>C Street</u>	<u>Columbia Street to Park Blvd.</u>	<u>Transit link only</u>
<u>E Street</u>	<u>Harbor Dr. to Pacific Highway</u>	<u>Two-way, 2-lane</u>
<u>E Street</u>	<u>State Street to Union Street</u>	<u>Closed</u>
<u>E Street¹</u>	<u>Park Blvd. to I-5</u>	<u>One-way, 3-lane (Eastbound)</u>
<u>F Street</u>	<u>Harbor Dr. to Pacific Highway</u>	<u>Two-way, 2-lane</u>
<u>G Street</u>	<u>Park Blvd. to 17th Street</u>	<u>4-lane EB 1-way, no parking, during peak periods</u>
<u>G Street¹</u>	<u>Harbor Dr. to Pacific Highway</u>	<u>Two-way, 2-lane</u>
	<u>Front Street to First Avenue</u>	<u>Two-way, 3-lane</u>
<u>L Street</u>	<u>14th Street to 16th Street</u>	<u>Two-way, 2-lane</u>
<u>Kettner Street</u>	<u>Cedar Street to Beech Street</u>	<u>One-way, 2-lane</u>
<u>Imperial Avenue</u>	<u>Park Blvd. to 19th Street</u>	<u>4-lane 2-way, with continuous left turn lane, no parking</u>
<u>India Street¹</u>	<u>Ivy Street to Fir Street</u>	<u>One-way, 2-lane</u>
<u>Columbia Street¹</u>	<u>Ivy St to Broadway</u>	<u>2-lane off-peak/ 3-lane peak</u>
<u>Union</u>	<u>Broadway to F Street</u>	<u>Closed</u>
<u>Second Avenue¹</u>	<u>Broadway to C Street</u>	<u>Closed at C Street</u>
<u>Third Avenue</u>	<u>G Street to Market Street</u>	<u>Two-way, 2-lane</u>
<u>Fifth Avenue</u>	<u>Elm Street to Ash Street</u>	<u>4-lane NB 1-way, no parking, during peak periods</u>
<u>Seventh Avenue¹</u>	<u>Beech Street to Ash Street</u>	<u>Two-way, 2 lane</u>
<u>Seventh Avenue¹</u>	<u>Ash Street to B Street</u>	<u>One-way, 2-lane</u>
<u>Seventh Avenue¹</u>	<u>B Street to Broadway</u>	<u>Study Closure at C Street</u>
<u>Eighth Avenue</u>	<u>Date to Elm</u>	<u>Two-way, 2-lane</u>
<u>13th Street</u>	<u>C Street to E Street</u>	<u>Two-way, 3-lane</u>
<u>14th Street</u>	<u>E Street to Market Street</u>	<u>Two-way, 2-lane</u>

TABLE 5.2-21
Proposed Roadway Segment Improvements

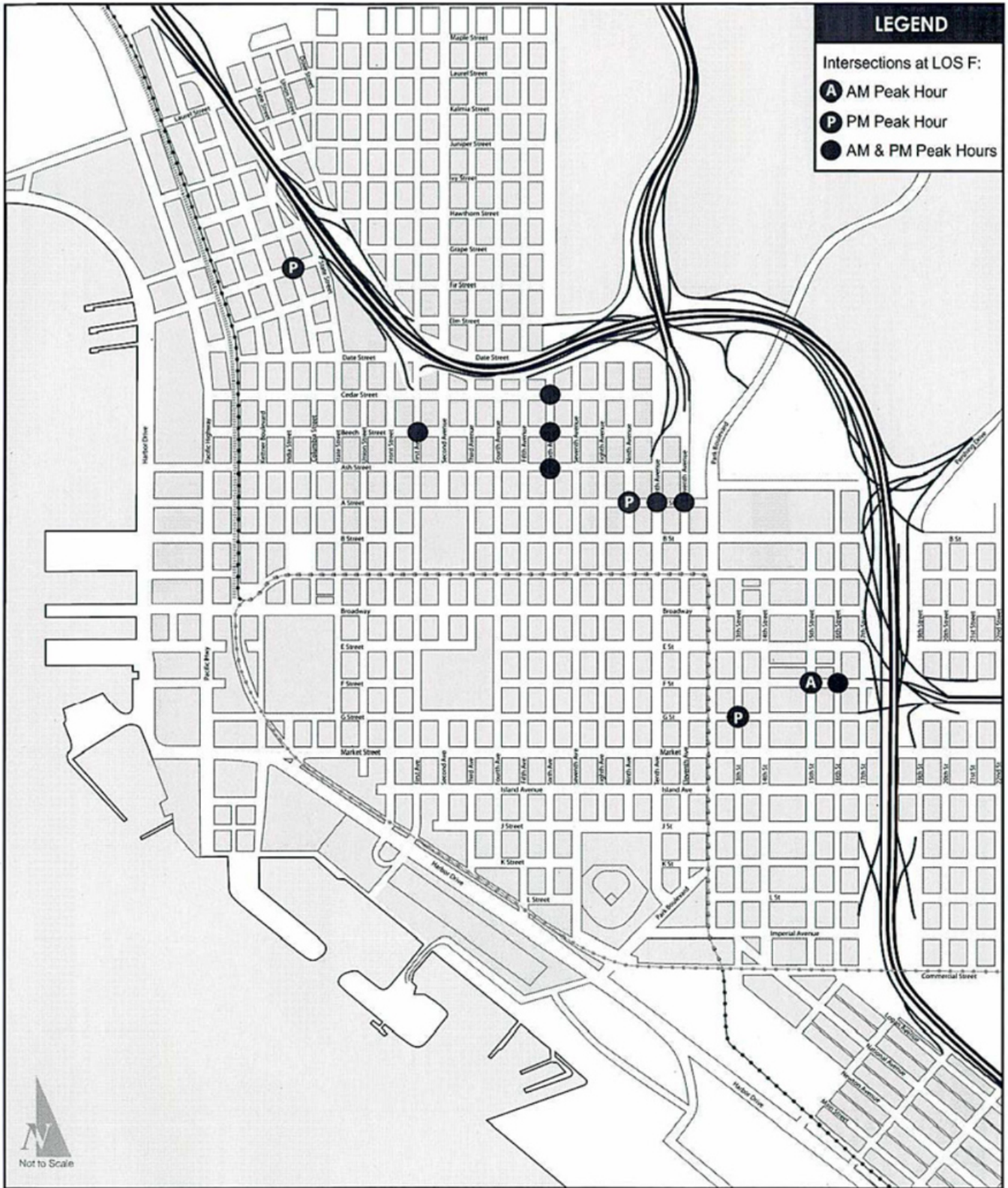
<u>ROADWAY</u>	<u>SEGMENT</u>	<u>PROPOSED IMPROVEMENT</u>
<u>15th Street</u>	<u>K Street to Imperial Avenue</u>	<u>Two-way, 2-lane</u>
<u>19th Street</u>	<u>Imperial Avenue to SR-94</u>	<u>3-lane NB 1-way, with parking</u>
<u>new grid¹</u>	<u>South of Harbor Dr., between Pacific Highway and Kettner Street</u>	<u>Grid of two-way, 2-lane streets extending to waterfront</u>

¹ Indicates proposed improvement which requires additional evaluation.

Mitigation Measure TRF-A.1.1-2: Prior to approval of any development which would generate a sufficient number of trips to qualify as a large project under the Congestion Management Program (i.e. more than 2,400 daily trips, or 200 trips during a peak hour period), a traffic study shall be completed as part of the Secondary Study process. The traffic study shall be prepared in accordance with City’s Traffic Impact Study Manual. If the traffic study indicates that roadways substantially affected by the project would operate at LOS F with the addition of project traffic, the traffic study shall identify improvements to grid street segments and/or intersections which would be required within the next five years to achieve an acceptable LOS or reduce congestion, to the extent feasible. If the needed improvements are already included in CCDC’s CIP, or the equivalent, no further action shall be required. If the any of the required improvements are not included in the CIP, or not expected within five years of project completion, CCDC shall amend the CIP, within one year of project approval, to include the required improvements and assure that they will be implemented within five years of project completion. At CCDC’s discretion, the developer may be assessed a pro-rated share of the cost of improvements.

Mitigation Measure TRF-A.1.1-3: Upon adoption of the Community Plan, CCDC and the City shall update the Centre City Public Facilities Financing Plan (PFFP) to include a transportation element to be completed within six (6) months. The update to the Centre City PFFP required by this mitigation measure shall include the following:

- a) The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities;
- b) The PFFP update will specify transportation improvements as identified on Figure 7.2 of the Community Plan and further described on Table 5.2-21 and Figure 5.2-8 of this FEIR;
- c) The PFFP update will specifically include capital improvements to the downtown transit network as identified on page 7-10 and Figure 7-4 of the Community Plan and further described in Table 5.2-22 of this FEIR;



Source: Wilson and Company, 2005



Unmitigable Intersections _____ Figure 5.2-8

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TABLE 5.2-22
Proposed Local Transit Improvements

<u>No.</u>	<u>IMPROVEMENT</u>	<u>DESCRIPTION</u>
1	<u>C Street/Park Boulevard/Bayside Trolley Corridor Improvements</u>	<ul style="list-style-type: none"> - <u>Advanced Traffic Signal Management System</u> - <u>Expand/upgrade Civic Center Station to accommodate four-car trains</u> - <u>Other station improvements to accommodate four-car trains</u> - <u>Station modifications to accommodate low-floor vehicles</u> - <u>Station shelters, hardscape, and landscape improvements</u> - <u>Upgraded track work</u>
2	<u>Downtown Stations for Early Action BRT/Rapid Bus Services</u>	<ul style="list-style-type: none"> - <u>Upgraded shelters/hardscaping./landscaping/passenger information</u>
3	<u>Downtown Periphery Bus Transit Centers</u>	<ul style="list-style-type: none"> - <u>Transfer stations at west and east ends of Broadway to facilitate bus/trolley transfers (minimizes Broadway bus volumes)</u>
4	<u>Transit and Bus Rapid Transit (BRT) Priority Measures</u>	<ul style="list-style-type: none"> - <u>Signal priority treatments/queue jump lanes/transit lanes on key downtown transit streets to provide peak hour and priority access</u>
5	<u>Santa Fe Depot/American Plaza Station & Pedestrian Improvements</u>	<ul style="list-style-type: none"> - <u>Enhanced station platforms and pedestrian connections between Santa Fe Depot and America Plaza Trolley stations to facilitate transfers between trolley lines</u>
6	<u>Twelfth & Imperial Station and Track Improvements</u>	<ul style="list-style-type: none"> - <u>Upgraded station to accommodate increased ridership and track improvements to provide Bayside to South Bay connectivity</u>
7	<u>Additional Trolley Vehicles</u>	<ul style="list-style-type: none"> - <u>Additional trolley vehicles to handle downtown growth (would be procured over time to match population and employment growth)</u>
8	<u>Downtown Shuttle/Circulator Vehicles</u>	<ul style="list-style-type: none"> - <u>Dedicated fleet of small vehicles for downtown routes</u>
9	<u>Downtown Transit Improvement Study, (including Subway Study)</u>	<ul style="list-style-type: none"> - <u>Continuation of Comprehensive Downtown Transit Study work for BRT routing</u> - <u>Feasibility study for downtown trolley subway, including assessment engineering, environmental and capital costs</u>

- d) For this mitigation measure, the PFFP update will not include freeway improvements, freeway ramps and will not now or in the future include transit operation or maintenance improvements as these are specifically prohibited in Government Code 66000, which are addressed in Mitigation Measure TRF-A.2.1-2 below;
- e) The PFFP update will set forth a timeline and other agreed-upon relevant criteria for implementation of each improvement identified in items (b) and (c) above;
- f) The PFFP update will identify the total estimated costs for each improvement in items (b) and (c) above as provided for by CCDC and reviewed and confirmed by the City's Transportation Planning and Facilities Financing Section of the Planning Department;
- g) The PFFP update will include the establishment of a fair-share contribution from downtown development for improvement in items b) and c) above, through a Developer Impact Fee or secure, local alternative funding sources, in a manner that will comply with applicable law;
- h) Prior to adoption by the City of San Diego Council, the PFFP will be sent to the Entities for their review and comment;
- i) CCDC and the Facilities Financing Section of the Planning Department shall seek adoption of the PFFP update at a public hearing before the San Diego City Council within six months after adoption of the Community Plan Update. As extension not to exceed three (3) months shall be granted upon mutual consent of the Entities.

The failure or refusal of any Entity other than CCDC or the City, to cooperate in the implementation of this mitigation measure, shall not constitute a failure of CCDC or the City to implement this mitigation measure; however, the City and CCDC shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.

Impact TRF-A.1.2 Impacts on Surrounding Streets

Implementation of Mitigation Measure TRF-A.1.1-1 would provide mitigation for surrounding street impacts.

Impact TRF-A.2.1 Impacts on Freeways

The proposed Community Plan would contribute to projected substandard traffic conditions on study area freeway segments (I-5, SR-163 and SR-94) and ramps serving the downtown area. Poor operations on the freeway mainlines are caused by high forecast traffic volumes and merge/diverse conflicts at the various on- and off-ramp locations. As a contributing factor to the forecast travel demands on the study area freeway facilities, the proposed Community Plan would result in significant traffic impacts to these facilities.

As noted previously, the traffic analysis was conducted assuming the various roadway network assumptions included in the "revenue-constrained" funding scenario of the SANDAG RTP. This

was intended at the time of the analysis to represent an appropriate worst-case scenario. Since passage of the Transnet funding program in November 2004, the SANDAG RTP “Mobility” scenario becomes the operative plan for regional transportation planning. This scenario includes implementation of High Occupancy Vehicle (HOV) lanes on I-5 through the downtown area as well as on SR 94 serving downtown to/from the east. These improvements would, in part, improve the capacity of the freeway system and resulting traffic operations, but would not specifically address freeway ramp operations and associated access requirements for the downtown area.

Previous SANDAG studies of the freeway system and the ramps serving the downtown area (Central I-5 Corridor Study; Freeway Deficiency Plan, December 2003) identified potential freeway improvements that would address projected longer range deficiencies. These improvements included additional through lanes on I-5, supported by new auxiliary lanes and a modified system of ramps serving the downtown area. This study also confirmed that no feasible and acceptable improvement options are available to address projected deficiencies on SR-163, north of downtown due to the demonstrated public over maintaining the aesthetic qualities of this highway through Balboa Park. SANDAG, Caltrans and CCDC have recommended further study of the freeway improvement proposals identified by the Central I-5 Corridor Study to ensure proper consideration of all potential community and environmental impacts.

In addition, each of the ramps serving downtown were evaluated in the course of the traffic study to determine the feasibility of adding the additional lanes needed to accommodate buildout traffic. According to Table 4.14 of the Traffic Study, the feasibility of adding any additional lanes to these ramps is extremely limited. In general, the addition of lanes to the ramps is restricted by two primary factors. First, the freeway and/or ramp facilities cannot accommodate either additional merging movements or the necessary entrance/exit lane configuration. Second, the on-street network cannot accommodate either the additional lane(s) feeding or exiting the ramp.

Due to the uncertainty associated with implementing freeway improvements and limitations on increasing ramp capacity, the freeway impacts associated with the proposed Community Plan would remain significant and unmitigated. However, in an effort to promote securing the appropriate freeway improvements, the following mitigation measures would be implemented.

Mitigation Measure TRF-A.2.1-1: Upon adoption of the Community Plan, CCDC shall initiate a multi-jurisdictional effort to develop a detailed, enforceable plan [the Plan] that will identify transportation improvements that would reduce congestion on I-5 through downtown, as well as identify funding sources including federal, state, regional and local funding and which may also include fair share contributions by development as well as other mechanisms based on a nexus study. The process and Plan required by this mitigation measure shall include the following.

- a) The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, Caltrans, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities.
- b) The Plan will specifically identify physical and operational improvements to I-5, other freeways, relevant arterial roads and transit facilities [the Improvements], that are focused on specific transportation impacts created by downtown development, and will also identify the specific responsibilities of each Entity for the construction, maintenance and financing for each

Improvement. The Plan may also identify other improvements necessary to address regional transportation needs, but for purposes of this mitigation measure, the Improvements included in the Plan need only be designed to mitigate the impacts created by downtown development.

- c) The Plan will set forth a timeline and other agreed-upon relevant criteria for implementation of each Improvement.
- d) The Plan will identify the total estimated costs for each such Improvement, including construction, maintenance and operational costs [the Total Costs], and the responsibility of each Entity for both implementation and funding for such Total Costs.
- e) The Plan will include the parameters for any fair-share or development impact fee programs (or the like) to be implemented, that would require private and/or public developers to contribute to the Total Costs, in a manner that will comply with applicable law.
- f) In developing the Plan, the Entities shall also consider ways in which the Improvements can be coordinated with existing local and regional transportation and facilities financing plans and programs, in order to avoid duplication of effort and expenditure; however, the existence of such other plans and programs shall not relieve the Entities of their collective obligation to develop and implement the Plan as set forth in this mitigation measure. Nothing in the Plan shall be construed as relieving any Entity (or any other entity) from its independent responsibility (if any) for the planning, funding, construction, maintenance or operation of any transportation improvement.
- g) Upon adoption of the Plan by the City Council, SANDAG, MTS and Caltrans will also seek endorsement of same through their government structures.
- h) CCDC shall seek adoption of the Plan at a public hearing before the City Council within one year of the initiation of the multi-jurisdictional effort to develop the Plan. CCDC shall report in writing, and at a public hearing before the City Council and SANDAG (if SANDAG agrees to place such a report on its agenda), regarding the progress made to develop the Plan, within six months of the first meeting of the entities. Thereafter, CCDC shall report to the City Council at least annually regarding the progress of the Plan, for a period of not less than five years, which may be extended at the request of the City Council.
- i) The Plan shall also expressly include each Entity's pledge that it will cooperate with CCDC in making the required reports to the Agency, including the presence and participation of a responsible representative of the Entity at all public hearings called for the purpose of reviewing the progress of development and implementation of the Plan.
- j) The PFFP shall be amended to include any projects in the Plan that CCDC and the City Council determine are appropriate for inclusion in the PFFP. The amendment to the PFFP to accommodate such appropriate improvements shall be processed for adoption at the time the Plan is submitted for adoption to the City Council.

The failure or refusal of any Entity other than CCDC or the City to cooperate in the implementation of this mitigation measure shall not constitute a failure of CCDC or the City to implement this

mitigation measure; however, the CCDC and City shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.

Further, if the City Council or Redevelopment Agency finds that (1) any of the Entities fails or has failed to cooperate in the development or implementation of this Plan, or (2) there is insufficient funding for implementation of the improvements in accord with the Plan, or (3) development downtown has significantly outpaced the development of infrastructure needed to support the development, the Council/Agency shall thereafter review the status of the Plan and its improvements, to determine whether substantial evidence shows that any of the conditions listed in Public Resources Code section 21166 and Guidelines section 15162 exist, so that additional environmental documentation would be required. In any event, the annual progress report delivered by CCDC pursuant to this mitigation measure shall include an evaluation of whether any of these conditions exist.

Impact TRF-A.2.2 Elimination of Cedar Street Offramp

Implementation of the following mitigation measure would reduce potential impact of eliminating the Cedar Street off-ramp but not to below a level of significance due to the uncertainty associated with the conclusions of the evaluation required by the mitigation measure.

Mitigation Measure TRF A.2.2-1: Prior to elimination of the Cedar Street off-ramp from I-5, a traffic study shall be done by CCDC in consultation with the City of San Diego and Caltrans to determine the potential effects associated with elimination of the off-ramp and the conversion of Cedar Street from one- to two-way. The report shall also identify roadway modifications that would minimize potential impacts on local surface streets and I-5.

Surrounding Roadways

Implementation of roadway improvements such as restriping and/or widening may be able to reduce cumulative impacts on surrounding roadways. Subsequent monitoring required by Mitigation Measure TRF-A.1.1-1 would determine appropriate improvements.

Transit

Fair share contributions from downtown development pursuant to Table 5.2-22 and Mitigation Measure TRF- A.1.1-3 will assist SANDAG in meeting As SANDAG expects to be able to meet the demand for transit resulting from the proposed Plan. As a result, no mitigation measures are required for transit.

Non-Motorized Transportation

Consideration of pedestrian and bicycle activities, as required by Mitigation Measure TRF A.1-1 would provide adequate mitigation for potential impacts associated with roadway improvements.

Impact TRF-D.1 Excessive Parking Demand

The proposed PDO would establish parking standards which would assure that future development provides for its minimum demand for parking.

As the downtown develops and a parking shortfall develops, construction of new publicly-owned parking facilities could fill the shortage. Parking garages could be centrally located in key activity nodes or located on peripheral areas served by shuttle bus services. Typical multi-level parking structures in the downtown area could provide 600-700 parking spaces each, with larger facilities providing over 1,000 spaces.

In addition to constructing additional parking supply, successful implementation of parking demand measures could offset the need for new parking. Many elements will need to be considered in the development of a parking management strategy for the downtown. While the intent would not be to specify the components of a comprehensive parking management strategy for the downtown area, some example measures could include:

- Provide incentives for shared parking for developments with mixed uses to encourage joint development and improve utilization of parking facilities;
- Enhance coordination between parking and transit services, including encouraging commuters to park at remote and fringe locations and utilize downtown transit services;
- Implement car sharing programs to eliminate and reduce the need for an individual to have a personal car available for travel.

In order to minimize parking impacts downtown and within surrounding residential areas, CCDC shall assess the availability of parking with the demand generated by downtown development. The study area shall include downtown as well as amount of parking generated by downtown development which is occurring in residential areas within a quarter-mile radius of downtown. This would be achieved through implementation of the following mitigation measure and carry-out programs to reduce impacts in accordance with the following mitigation measure.

Mitigation Measure TRF-D.1-1: At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall evaluate the parking supply and demand within the downtown area as well as assess the amount of parking generated by downtown development in residential areas within a quarter-mile radius of downtown. The evaluations will include an inventory of the number of public and private parking spaces available for public parking within downtown and the residential neighborhoods within a quarter-mile radius of downtown. The evaluation shall determine the current as well as anticipated parking supply and demand during the ensuing five-year period. Based on the evaluation, Upon adoption of the proposed Community Plan, CCDC will conduct an initial inventory to establish a baseline for determining additional impacts from downtown development. During the subsequent 5 year assessments, CCDC shall determine if the discrepancy between demand and supply impact has increased to a level which warrants ameliorative actions which may include but not be limited to: (1) constructing new public parking, (2) implementing specific shared parking programs with private parking facilities, (3) implementing parking meter programs that respond to changes in the parking demand which occur during a 24-

hour period and/or (4) implementing residential permit parking programs. Any actions identified during the parking evaluation shall be incorporated into CCDC's and include parking facilities determined to be required in its Capital Improvement Program, if appropriate, -or carried out through some other form of enforcement such as amending Planned District Ordinances or other regulatory programs dealing with parking.~~other implementation program.~~

5.2.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impact TRF-A.1.1 Impact on Grid Streets

Level of Significance After Mitigation: Significant

The increase in traffic with the proposed Community Plan would create daily traffic volumes which would exceed the capacity of 62 intersections given their current configuration. Preliminary analysis indicates that improvements can be made at 50 of these intersections which would maintain an acceptable level of service. Up to 12 intersections may not be able to be improved to provide an adequate level of service due to constraints imposed by adjacent land use. In addition, conflicts with pedestrian or bicycle activities could override the traffic benefits of some of the preliminary solutions for intersection improvements. Thus, impacts to grid streets are considered significant and unmitigable.

Impact TRF-A.1.2 Impact on Surrounding Streets

Level of Significance After Mitigation: Significant

The increase in traffic with the proposed Community Plan would create daily traffic volumes which would cause an existing, acceptable level of service to become unacceptable. Implementation of roadway improvements such as restriping and/or widening may be able to reduce cumulative impacts on surrounding roadways. Subsequent monitoring required by Mitigation Measure TRF-A.1.1-1 and traffic studies required by Mitigation Measure A.1.1-2 would determine appropriate improvements. As no specific information exists at this time regarding potential improvements or guarantees exists that improvements would be implemented, the impacts are considered potentially significant and unmitigable.

Impact TRF-A.2.1 Impact on Freeways

Level of Significance After Mitigation: Significant

Traffic volumes in the buildout condition would significantly impact nine freeway segments and 14 freeway ramps. Impacts to the freeway system are considered significant and unmitigable for several reasons. First, CCDC and the City of San Diego do not have jurisdiction to improve the freeway system. Second, adjacent land uses severely constrain the ability of Caltrans to implement major modifications to the freeway system. Nevertheless, the commitment imposed upon CCDC (Mitigation Measure A.2.1-1) to initiate a multi-agency study to define improvements and financing for the downtown freeway system would help toward finding solutions.

Impact TRF-A.2.2 Elimination of Cedar Street Off-ramp**Level of Significance After Mitigation: Significant**

The potential effect of eliminating the Cedar Street off-ramp are unknown. Although the study required by Mitigation Measure TRF-A.2.2-1 could potentially reduce the potential impacts on surface streets and I-5, insufficient information exists to determine if the potential impact could be reduced to below a level of significance.

Impact TRF-D.1 Excessive Parking Demand**Level of Significance After Mitigation: Significant**

The demand for parking at buildout would exceed the amount of parking supply that would be created solely from conforming to the parking requirements of the proposed PDO. Implementation of Mitigation Measure TRF-D.1-1 would require periodic review of the parking supply and a determination by CCDC of what, if any, actions could be undertaken to reduce excessive demand including but not be limited to: (1) constructing new public parking, (2) implementing specific shared parking programs with private parking facilities, (3) implementing parking meter programs that respond to changes in the parking demand which occur during a 24-hour period and/or (4) implementing residential permit parking programs. Any actions identified during the parking evaluation would be incorporated into CCDC's Capital Improvement Program, if appropriate, or carried out through some other form of enforcement such as amending Planned District Ordinances or other regulatory programs dealing with parking. However, despite these actions, there would be no guarantee that the full parking demand would be met. Potential shortages of parking could be mitigated by mandating the construction of public parking facilities to meet the parking demand which is unmet by the PDO parking requirements. However, this mitigation measure is not proposed for several reasons. Unrestrained parking availability would be contrary to the goal of promoting alternative forms of transportation to and from as well as within downtown. The inability to find convenient parking encourages commuters and retail patrons to take transit. Increased use of transit is critical to reducing mobile-source air emissions attributed to private automobiles and reducing traffic congestion on local and regional roadways. Correlating the location of public parking with the demand would also be difficult to achieve due to the lack of assurance that suitable property would be available to construct the necessary parking facilities. Lastly, funding sources for public parking structures would likely be uncertain. Thus, the impact of buildout out of the proposed Plans and Ordinance on parking is considered significant and unmitigable.

5.3 ~~CULTURAL~~ HISTORICAL RESOURCES

5.3.1 EXISTING CONDITIONS

The following discussion summarizes the ~~cultural resources study~~historical resources report for the downtown planning area prepared by Marie Burke Lia, Attorney at Law, as a consultant to CCDC. The complete report is contained in Appendix 2.3 of the technical appendices.

The following discussion is divided between historical and archaeological resources. In accordance with Section 143.0210 of the City's Land Development Code as defined in Chapter 11, historical resources include:

- Designated historical resources;
- Historical buildings;
- Historical districts;
- Historical landscapes; and
- Historical objects.

Archaeological resources include:

- Important archaeological sites; and
- Traditional cultural properties.

5.3.1.1 Historic Buildings/Structures

Methodology

As the oldest part of metropolitan San Diego outside of Old Town, the downtown planning area contains a large and well-documented collection of historic buildings and structures. These historic buildings/structures have been extensively reviewed and inventoried to identify potential eligibility for federal, state and local designation. Within the past four years, four surveys have been conducted to address various historical themes within the downtown planning area, and much of this activity has emphasized the East Village District. These four surveys were prepared by various consultants to CCDC. The first survey was an update of the 1988-89 Historic Site Inventory of Centre City that was prepared for the 1992 expansion of the Centre City Redevelopment Area. This update focused on the Core and East Village Districts of the downtown planning area, districts which had not been addressed by the Historical Resources Board subsequent to the distribution of the 1988-89 Inventory. The second survey was a new survey of properties more than 45 years of age within these districts, which had not been previously addressed. The third survey was required by a Settlement Agreement from the Ballpark litigation and required the evaluation of a potential Warehouse District within the downtown planning area. The fourth survey was initiated by CCDC to understand the historical contributions made by African/Americans to the downtown planning area. As a result of this extensive survey activity, the historic buildings/structures database for downtown is thorough and includes the entire Centre City Redevelopment Project area.

Basis for Establishing Historical Value

The determination of significance for historic buildings/structures in this EIR is based upon the criteria utilized by the National Register of Historic Places (National Register), California Register of Historical Resources (California Register) and City of San Diego's Register of Designated Historical Structures-Historical Resources Register (San Diego Register).

Federal Criteria

Authorized by the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470 et seq.), the National Register is the official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture. Preservation goals for National, California and City of San Diego Register-listed properties are described in Table 5.3-1.

**TABLE 5.3-1
Historical Designations and Preservation Goals**

HISTORICAL DESIGNATION/STATUS	PRESERVATION GOAL
National Register-Listed	Retention onsite; any improvements, renovation, rehabilitation, and/or adaptive reuse shall be consistent with the Secretary of Interior' Standards and Guidelines. Buildings/structures contributing to a National Register District have the same protection status as individually listed structures.
National Register-Eligible	Determine eligibility <u>Evaluate and encourage listing</u> through the State Office of Historic Preservation or the National Park Service. Buildings/ structures thus determined eligible have the same protection status as individually listed National Register buildings/ structures. If determined not eligible, determine eligibility for the San Diego Register and, if designated, provide San Diego Register protection.
California Register-Listed/Eligible	Retention onsite; any improvements, renovation, rehabilitation, and/or adaptive reuse should be consistent with the Secretary of Interior' Standards and Guidelines. Structures contributing to a California Register District have the same protection status as individually listed structures.
San Diego Register- of Designated <u>Historical Resources</u> ¹	<u>Whenever possible, retain resource onsite. Partial retention, relocation or demolition of a resource shall only be permitted through applicable City procedures. Depending on feasibility, retain on-site, retain significant portions onsite, relocate or document prior to demolition (listed in order of preference).</u> Buildings/structures contributing to a Local Register District have the same protection status as individually listed buildings/structures.

¹ Buildings/structures that are potentially eligible for listing must be taken to the City of San Diego Historical Resources Board for designation.

Source: CCDC, Downtown Community Plan, 2005.

Based on the National Register criteria, significant properties are districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- That are associated with events that have made a significant contribution to the broad patterns of our history;
- That are associated with the lives of persons significant in our past;
- That embody the distinct characteristics of a type, period, or method of construction, or that represent the workmanship of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- That has yielded, or may be likely to yield, information important in prehistory or history.

A property achieving significance within the last 50 years is eligible for the National Register only if it is of exceptional importance. Usually, properties eligible for, or listed on, the National Register are more than 50 years of age.

State Criteria

Similar to the National Register, the California Register is the authoritative guide in California used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial and adverse change [California Public Resources Code Sec. 5024.1(a)]. The California Register includes properties formally determined eligible for, or listed on, the National Register, State Historical Landmarks, State Historical Points of Interest, and nominated sites determined to be significant by the State Historical Resources Commission. Preservation goals for California Register-listed properties are described in Table 5.3-1.

Local Criteria

The City of San Diego Historical Resources Board is established by the City Council as an advisory board to identify, designate and preserve the historical resources of the City; to review and make a recommendation to the appropriate decision making authority on applications for permits and other matters relating to the demolition, destruction, substantial alteration, removal or relocation of designated historical resources; to establish criteria and provide for a Historical Resources Inventory of properties within the boundaries of the City; and to recommend to the City Council and Planning Commission procedures to facilitate the use of the Historical Resources Inventory results in the City's Planning process.

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be placed on the City's Register of Designated Historical Resources ~~designated~~ by the Historical Resources Board if it meets any of the following criteria:

- Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- Is identified with persons or events significant in local, state or national history;
- Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;
- Is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible for listing by the State Historic Preservation Office for listing on the State Register of Historic Resources; or,
- Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

Preservation goals for San Diego Register-designated properties are described in Table 5.3-1.

Local Regulatory Controls

The San Diego Municipal Code contains three ~~ordinances~~ regulations intended to preserve and protect historical resources to the greatest extent feasible. These ~~ordinances~~ regulations, which are contained in the Land Development Code: ~~The first~~ requires a Site Development Permit for any development proposed for a site where a historical resource is present, or for a site within a historical district, unless such proposal is exempt as based on consistency with the Secretary of the Interior's Standards (SDMC 126.0501 et seq. and 143.0201 et seq.); ~~The second~~ requires implementation of the CEQA and the State CEQA Guidelines for all proposed projects affecting "historical resources" as such resources are defined within that Act (SDMC 128.0101 et seq.); and ~~The third~~ requires that development affecting designated historical resources or historical districts provide full mitigation for the impact to the resource (SDMC 143.0251). In addition, Section 142.0670(b)(1) and (2) of the Land Development Code requires that specific street improvements be constructed to preserve historic design elements in specific neighborhoods. This includes the location, width, elevation, scoring pattern, texture, color and material to the satisfaction of the City Engineer. Concrete sidewalk stamps must be sawcut and replaced in-place or close proximity to the original location.

Historic Buildings/Structures-Historical Resources within the Project Area

For the purpose of this EIR, all of the above-referenced documentation of potentially designated and identified historic buildings/structures in the downtown planning area has been reviewed and evaluated. In the course of this review, five levels were developed to understand the current status of various categories of historic or potentially historic buildings/structures within the downtown planning area. Inventoried historic and potentially historic buildings/structures in the downtown planning area are listed in Table 5.3-2 and shown in Figure 5.3-1. Table 5.3-2 does not include buildings identified in potential historic districts. Although all National Register listed

**TABLE 5.3-2
Inventoried Historic Resources within the
Downtown Community Plan Area**

ADDRESS	RESOURCE NAME
National Register Listed	
1. 868 Fourth Avenue	Balboa Theater
2. 733 Eighth Avenue	Eagles Hall
3. 702 Ash Street	El Cortez Hotel
4. 326 Broadway	U.S. Grant Hotel
5. 1202 Kettner Blvd.	McClintock Warehouse
6. 233 A Street	Medico-Dental Building
7. 105 West F Street	Panama Hotel
8. 1600 Pacific Highway	San Diego Civic Center
9. 530 Broadway	San Diego Trust & Savings
10. 1050 Kettner Blvd.	Santa Fe Depot
11. 123 Broadway	Spreckels Theater Building
12. 325 West F Street	U.S. Courthouse
13. 815 E Street	U.S. Post Office
14. 1014 Fifth Ave/602 Broadway	Walker Scott Owl Drug
15. Various	Gaslamp Quarter Historic District
National Register Eligible	
16. 500 West Broadway	Armed Services YMCA
17. 301 West Market	Pacific Soap Factory
18. 903 Kettner	SDG&E Substation B
19. G at California Street	Plaza de Pantoja
20. 720 Fourth Avenue	Golden West Hotel
21. 339 West Broadway	Hotel San Diego
22. 1572 Second Avenue	Anton Mayrhofer Residence
23. 509 Twelfth Avenue	Bay View Hotel
24. 1620 Sixth Avenue	Bradley-Woolman Funeral Church
25. 330-336 C Street	California Theater
26. 350 Cedar Street	Elks Club Lodge
27. 1568 Ninth Avenue	John Ginty Residence
28. 420-424 Ash Street	J.C. Hearne Surgical Hospital
29. 1654-1668 State Street	Our Lady of the Rosary Church
30. 1535 Third Avenue	St. Joseph's Cathedral
31. 1362 Fourth Avenue	San Diego Gas & Electric

TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS	RESOURCE NAME
National Register Eligible (Continued)	
32. 1245 Island Avenue	Sheldon Residence
33. 540 Third Avenue	Plants & Fireproofing Building
34. 500 Third Avenue	Ying On Benevolent Assn. Building
35. 426-428 Third Avenue	Chinese Benevolent Assn. Building
<u>Local San Diego</u> Register Listed	
36. 1250 Sixth Avenue	San Diego Athletic Club
37. 625 Broadway	John D. Spreckels Building
38. 402 Island Avenue	Davis-Horton House
39. Broadway at Fourth Ave.	Horton Plaza and Fountain
40. 325 Island Avenue	Brooklyn (Kahle) Hotel
41. 1157 Columbia Street	San Diego Steam Laundry
42. 325 Island Avenue	Horton Grand Hotel
43. 765 Tenth Avenue	Buckner Hotel
44. Second Avenue and Ash Street	Kiessig Corner
45. 215 Seventh Avenue	Western Metal Building
46. 611 Island Avenue	Klauber Wagenheim Building
47. 305 Eighth Avenue	Showley Bros. Candy Factory
48. 715 J Street	Simon Levi Building
49. 861 Sixth Avenue	Timken Building
50. 330 Eighth Avenue	Levi Wholesale Grocery
51. Various (20+ buildings)	Asian/Pacific Historic District
52. 427 C Street	Marston Department Store
53. 1301 Fifth Avenue	Sanford Hotel
54. 1702 India Street	Bernadini Building
55. 1572 Columbia Street	Fire Station #6
56. 1665 Union Street	Shaffer Residence
57. 1658 Front Street	Clawson Jones Rental
58. 205 West Date	Silverhorn/Hord Residence
59. 820 West Ash	Parron Hall
60. 2260 Columbia Street	Foster-Kleiser Building
61. 1917 India Street	Fintzelberg Commercial Building
62. 1702 Kettner Blvd	Electrical Products Co.

TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS	RESOURCE NAME
Local San Diego Register Listed (Continued)	
63. 1703 India Street	DeFalco's Grocery
64. 1731 India Street	Tait's Meat Market
65. 1743 India Street	Auto Body Company
66. 1747 India Street	Muller Grocery
67. 2400 India Street	McDonough Cleaners
68. 800 West Ivy	Adams-Henry Company
69. 2308 Kettner Blvd	San Diego Macaroni Co.
70. 1557 Columbia	Ballatore's Residence
71. 1762 Columbia	St. Anne's Clinic
72. 1764 Columbia	Tait Rentals
73. 532 West Grape	Vue de L'Eau
74. 648 West Hawthorne	Fiesta Apartments
75. 1907 Kettner Blvd	Pray Rentals
76. 1620 State Street	Ordway Residence
77. 1632 State Street	Cook Residence
78. 1642 State Street	Spaeth Rental
79. 1644 State Street	Spaeth Residence
80. 1610 Union Street	Millard Rental
81. 1620 Union Street	Cassidy Home
82. 1642 Union Street	Kutchin Home
83. 1654 Union Street	French Rental
84. 354 Eleventh Avenue	Carnation/Qualitee Dairy
85. 230 West Cedar	Rawson Residence
86. 317 Ash Street	First Church Christ Science
87. 1468 First Avenue	San Diego Nurses Club
88. 1545 Second Avenue	Wilsonia Hotel
89. 1502 Sixth Avenue	Dr. Peper Residence
90. 1609 Eighth Avenue	Alexandria Apartments
91. 1604 Seventh Avenue	Mills Residence
92. 1471 Eighth Avenue	Kroenert Residence
93. 629 J Street	Julian Produce Company
94. 726 West Beech	Star Builders Company

TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS	RESOURCE NAME
Local San Diego Register Listed (Continued)	
95. 400 Eighth Avenue	Fire Station #4
96. 900 E Street	Guymon-Fletcher-Lovett Building
97. 906 Tenth Avenue	First Baptist Church
98. 21 16 th Street	Residence
99. 33 16 th Street	Residence
100. 53 16 th Street	Residence
101. 525 C Street	Scripps Building
102. 1041 Fifth Avenue	Jessop & Sons Building
103. 371 Eighth Avenue	Shieffer & Sons Warehouse
104. 1290 J Street	Rosario Hall
105. 808 J Street	Wellman Peck/TR Produce
106. 421 17 th Street	Evans Home
107. 911 Sixth Avenue	Leland Hotel
108. 721 14 th Street	Daggett Residence
109. 719 14 th Street	Murray Apartments
110. 171 14 th Street	Wonder Bread Building
111. 602 Broadway	Fletcher-Salmons Building
112. 500 Broadway	First National Bank
113. 1312 Twelfth Avenue	Riviera Apartment Hotel
114. 501 Seventh Avenue	Clermont/Coast Hotel
115. 81 buildings located on Fourth Avenue, Fifth Avenue, Sixth Avenue, Broadway, F Street, Market Street, and J Street	Gaslamp Quarter Historic District
116. 614 Fifth Avenue	Backesto Block Building
117. 813 Fifth Avenue	Hubbell Building
118. 809 Fifth Avenue	Marston Building
119. 611 Fifth Avenue	McGurck Block
120. 526-46 Market Street	I.O.O.F. Building
121. 432 F Street	Keating Building
122. 825-31 Fifth Avenue	Nesmith-Greely Building
123. 835-45 Fifth Avenue	Louis-Bank of Commerce
124. 631-33 Fifth Avenue	Yuma Building

TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS	RESOURCE NAME
Local San Diego Register Listed (Continued)	
125. Fifth Avenue and E Street	First National Bank
126. 750 Fifth Avenue	Spencer Ogden Building
127. 722-28 Fifth Avenue	Llewelyn Building
128. 660 Fifth Avenue	Cole Block
129. 560 Fourth Avenue	The Royal Pie Bakery
130. 552 Fifth Avenue	The Marin Hotel
131. 17 buildings located on Sixth Avenue, Fifth Avenue, Fourth Avenue, Third Avenue, and Market Street	Asian/Pacific Thematic District
132. 526 Third Avenue	Chinese Consolidated Benevolent Society Building
133. 502 Third Avenue	Ying-On Merchants and Labor Benevolent Association Building
134. 611-617 B Street	Southern Hotel
135. 927-945 Broadway	Frances Apartments
136. 428 C Street	Kress Department Store
137. 619 C Street/1071 Sixth Avenue	Burnham Building
138. 640 C Street	Hamilton Fine Foods
139. 801-819 C Street	Rowe Market Building
140. 827 C Street	Hotel Churchill
141. 914 C Street	Pacific Telephone & Telegraph
142. 926-928 C Street	Remington Rand Company Building
143. 1012 C Street	YWCA Building
144. 1037-1041 Fourth Avenue	Waldorf Hotel/Plaza Hotel
145. 950 Ninth Avenue	Carnegie Apartments
146. 1018 Ninth Avenue	Ed Fletcher Real Estate Office
147. 901 Tenth Avenue	Ameila Apartments
148. 930 Tenth Avenue	First Baptist Church Annex
149. 1045 Tenth Avenue	Fraze-Kurtz Paint & Annex
150. 1151-1159 Tenth Avenue	Harwood Tichenor Rental Property
151. 1229 Tenth Avenue	Elkins Apartments
152. 1130-1134 Eleventh Avenue	Lesinsky House
153. 820 E Street	San Diego City Library
154. 1027 Sixth Avenue	San Diego Federal

TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS	RESOURCE NAME
<u>Local San Diego Register Listed (Continued)</u>	
155. 1401 J Street	Carter Hotel
156. 1125-1133 Sixth Avenue	Vegetarian Cafeteria
157. 612-640 F Street	Maryland Hotel
158. 447 Ninth Avenue	Hiatt Family House
159. 200 Sixth Avenue	National City & Otay Railroad
160. 1460 Island Avenue	Electric Laundry Company Bldg.
161. 102-150 West Broadway	Pickwick Hotel
162. <u>701 16th Street</u>	<u>Snowflake Bakery</u>
163. <u>701 Island Avenue</u>	<u>Bledsoe Furniture Company</u>
164. <u>704 J Street</u>	<u>Western Wholesale Drugs</u>
165. <u>941 Eleventh Avenue</u>	<u>Hamilton Apartments</u>
166. <u>341-343 13th Street</u>	<u>Mexican Presbyterian Church</u>
<u>Local San Diego Register Eligible</u>	
167. 1531-1541 Broadway	Parcel No. 534-352-04
168. 1640 Broadway	Parcel No. 534-224-04
169. 109-113 C Street	Parcel No. 533-516-10
170. 1317 C Street	Parcel No. 534-205-02
171. 1321 C Street	Parcel No. 534-205-02
172. 1333 C Street	Parcel No. 534-205-03
173. 1343-1345 C Street	Parcel No. 534-205-12
174. 1425 C Street	Parcel No. 534-204-06
175. 901-923 E Street	Parcel No. 534-336-01
176. 1035 E Street	Parcel No. 534-335-09
177. 1045 E Street	Parcel No. 534-335-09
178. 1327-1335 E Street	Parcel No. 534-345-10
179. 1401-1429 E Street	Parcel No. 534-344-01
180. 1508-1544 E Street	Parcel No. 534-352-02 & 03
181. 741 F Street	Parcel No. 535-102-10
182. 801-821 F Street	Parcel No. 535-103-01
183. 1328-1344 F Street	Parcel No. 534-345-12
184. 1451-1453 F Street	Parcel No. 535-171-01
185. 1455 F Street	Parcel No. 535-171-09

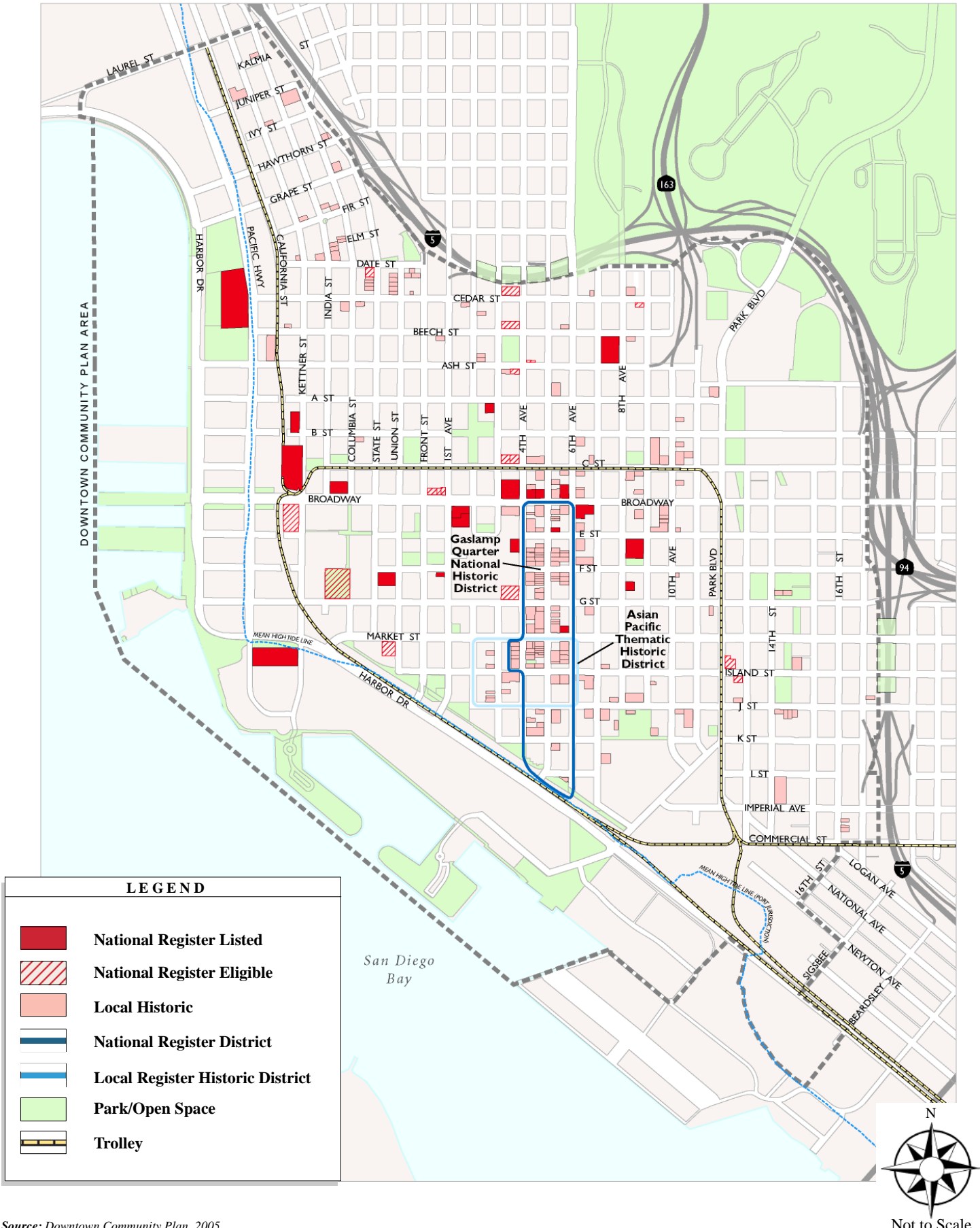
TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS	RESOURCE NAME
<u>San Diego Register Local-Eligible (Continued)</u>	
186. 1610-1620 F Street	Parcel No. 534-360-12
187. 643-655 G Street	Parcel No. 535-106-11
188. 675 G Street	Parcel No. 535-106-11
189. 903-915 Island	Parcel No. 535-126-01
185.701 Island Avenue	Parcel No. 535-115-04
189.190. 1619-1625 Island Avenue	Parcel No. 535-393-13
187.704 J Street	Parcel No. 535-115-04
191. 1335 J Street	Parcel No. 535-372-15
192. 1479 J Street	Parcel No. 535-396-04
193. 1619 J Street	Parcel No. 535-394-01
194. 1615 K Street	Parcel No. 535-383-01
195. 726-732 Market Street	Parcel No. 535-105-07
196. 1101 Market Street	Parcel No. 535-123-10
197. 1425-1431 Market Street	Parcel No. 535-153-14
198. 1704-1710 Market Street	Parcel No. 535-190-02
199. 1488 Market Street	Parcel No. 535-161-04
200. 1715 Market Street	Parcel No. 535-190-08
201. 705 Sixth Avenue	Parcel No. 535-101-03
202. 701 Seventh Avenue	Parcel No. 535-102-06
203. 615 Eighth Avenue	Parcel No. 535-104-03
204. 701-729 Eighth Avenue	Parcel No. 535-103-04
205. 660 Tenth Avenue	Parcel No. 535-136-01
206. 734 Tenth Avenue	Parcel No. 535-131-05
207. 743-733 Tenth Avenue	Parcel No. 535-132-04
208. 650 Eleventh Avenue	Parcel No. 535-135-09
209. 727-733 Eleventh Avenue	Parcel No. 535-133-15
210. 741 Eleventh Avenue	Parcel No. 535-133-03
211. 760-770 Eleventh Avenue	Parcel No. 535-132-07
209.941 Eleventh Avenue	Parcel No. 534-333-02
212. 509 Twelfth Avenue	Parcel No. 535-151-05
213. 999 Twelfth Avenue	Parcel No. 534-341-10
214. 1025 Twelfth Avenue	Parcel No. 534-206-03

TABLE 5.3-2 (Continued)
Inventoried Historic Resources within the
Downtown Community Plan Area

ADDRESS		RESOURCE NAME
<u>Local San Diego Register Eligible (Continued)</u>		
215.	1166 Twelfth Avenue	Parcel No. 534-193-10
	214.353-357 13th Avenue	Parcel No. 535-372-03
216.	416 13 th Street	Parcel No. 535-156-06
217.	454 13 th Street	Parcel No. 535-156-08
218.	360 15 th Street	Parcel No. 535-396-04
219.	648 15 th Street	Parcel No. 535-174-04
220.	1037 15 th Street	Parcel No. 534-225-04
221.	39 16 th Street	Parcel No. 535-623-04
222.	255 16 th Street	Parcel No. 535-383-02
	222.701-16th Street	Parcel No. 535-180-01
223.	716 16 th Street	Parcel No. 535-172-06
224.	815 16 th Street	Parcel No. 534-360-12
225.	349-363 17 th Street	Parcel No. 535-406-01
226.	420-424 17 th Street	Parcel No. 535-393-08
227.	430 17 th Street	Parcel No. 535-393-09
228.	454 17 th Street	Parcel No. 535-393-11
229.	470 17 th Street	Parcel No. 535-393-13
230.	505 17 th Street	Parcel No. 535-190-14
231.	508 17 th Street	Parcel No. 535-164-03
232.	512 17 th Street	Parcel No. 535-164-03
233.	515 17 th Street	Parcel No. 535-190-13
234.	518 17 th Street	Parcel No. 535-164-03
235.	525 17 th Street	Parcel No. 535-190-41
236.	531 17 th Street	Parcel No. 535-190-40
237.	532-534 17 th Street	Parcel No. 535-164-04
238.	768 17 th Street	Parcel No. 535-180-05
239.	914 17 th Street	Parcel No. 534-360-07

Source: Marie Lia, Historical Resources Report for the Centre City Community Plan Update, 2005



Source: Downtown Community Plan, 2005

Designated Architectural Resources _____ Figure 5.3-1

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buildings/structures are also automatically listed on the California Register, Table 5.3-2 lists them once under the National Register category.

Category 1: National Register and/or California Register-Listed Buildings/Structures

The first and highest category consists of buildings/structures listed on the National Register and/or California Register, or contributing to a National Register Historical District. Within the downtown planning area, 14 individual buildings/structures are listed on the National Register and California Register. In addition, the Gaslamp Quarter was listed as a National Register Historic District in 1980. At the time of the Gaslamp Quarter's listing, 86 buildings/structures were identified as potential contributors. Since then, 38 buildings/structures have been formally designated as contributors to the District and five have been demolished, leaving a total of 81 identified or potential contributors. The potential contributors are presumed to be contributors to the District for purposes of development and environmental review. All identified contributors to the Gaslamp Quarter National Register Historic district are also contributors to a Local Historical District.

Category 2: National Register and/or California Register-Eligible Buildings/Structures

This category includes buildings/structures determined eligible for the National Register and/or California Register, but not yet listed. The Keeper of the Register has determined that 6 properties within the downtown planning area, but outside of the Gaslamp Quarter, are eligible. The State Office of Historic Preservation has determined that a total of 11 properties outside the Gaslamp Quarter are eligible for the National Register, and various Historic Site Inventories have identified three additional properties that may be eligible for the National Register.

Category 3: San Diego Register-Designated Buildings/Structures

Outside of the Gaslamp Quarter, but within the downtown planning area, 125 individual properties are listed on the San Diego Register. This total includes three categories of sites: (1) those designated prior to 1990, (2) those within three of the five Districts that were the subject of the 1988-89 Historic Sites Inventory and were subsequently designated, and (3) those within the 1998 Ballpark Inventory that were subsequently designated. The three 1988-89 Inventory Districts were Little Italy, Cortez and Core. At hearings held in 1990, 1999 and 2004, these District Inventories were reviewed by the Historical Resources Board and specific sites were designated. Other sites were not-designated and thus cleared for redevelopment. However, the designation of 6 sites within the Core District has been appealed to the City Council, and the designation consideration of 1 additional Core site has been continued.

Another 17 buildings/structures have been identified as contributors to the Asian/Pacific Thematic Historic District [established by adoption of the Asian Pacific Thematic Historic District Master Plan in 1995](#). All of these buildings/structures constitute designated historical resources. Within thematic districts, individual buildings/structures that represent the historic theme within the specified boundaries are considered contributors, but buildings/structures that do not represent the historic theme are not restricted, unless otherwise listed.

Category 4: San Diego Register Potentially Eligible Buildings/Structures

This category includes two types of buildings/structures identified in the Historic Site Inventories as potentially eligible for local designation that have not been reviewed by the Historical Resources Board. These buildings/structures are located in the East Village District. Between 2001 and 2004, CCDC updated the 1988-89 Inventory for this district. The Historical Resources Board staff and their consultants have reviewed these sites and included 70 of them, with eligibility recommendations, in a document entitled “East Village Combined Surveys” that was formally submitted to the Historical Resources Board in January of 2005. These 70 buildings/structures, referred to as Updates, are the first type identified as potentially eligible.

The second type of potentially eligible buildings/structures are referred to as “Over 45s” and includes those buildings/structures identified in the 2001 photographic survey as more than 45 years of age. The intent of the survey was to identify buildings/structures which had not been included in previous inventories, but which appeared to be more than 45 years of age, ~~the CEQA cutoff for potential historical significance.~~ This photographic survey identified 152 sites. Between 2001 and 2004, a review process conducted by Historical Resources Board Staff and their consultants and CCDC Staff and their consultants, with public input, reduced the number of buildings/structures identified in the photographic survey to nine within the Core District (which were addressed, as described above, in 2004) and 14 within the East Village District.

The above-referenced “East Village Combined Surveys” that were submitted to the Historical Resources Board in January of 2005 included 70 “Updates,” East Village District building/structures from the 1988-89 Inventory; one “Over 45” continued Core building/structure; and 14 “Over 45s” East Village District building/structures for a total of 85 properties. Historical Resources Board staff is recommending designation of 69 of these 85 buildings/structures. Subsequent proceedings have reduced this total to 81 properties. Individual property owners will be entitled to bring their properties forward, seeking designation or non-designation, if and when they determine such action is appropriate.

Category 5: Potential Contributors to Proposed Historical Districts

In 1999, a Settlement Agreement was entered into by parties to litigation over the new Ballpark to be constructed in the East Village District. That Agreement required the evaluation of a potential Warehouse District within Centre City in accordance with national, state and local criteria. Upon completion of that evaluation, Save Our Heritage Organization (SOHO) and the National Trust for Historic Preservation (NTHP) are charged with the determination as to whether a potential warehouse district, qualifying for listing on any register, exists and, if so, the responsibility to direct that a district nomination be prepared. The recently completed “Historic Assessment Report for a Proposed Warehouse Thematic District,” prepared by Heritage Architecture & Planning, will serve as this evaluation. The report identified 59 structures as potential contributors to a San Diego Register Warehouse Thematic Historic District. The boundaries of the proposed District are the railroad easement along Harbor Drive and Commercial Avenue as the southern boundary, the west side of Fourth Avenue as the western boundary, mid-block between Market and Island Avenue as the northern boundary, and the east side of 15th Street as the eastern boundary. It is possible that the designation of such a Warehouse Thematic Historic District, will be considered by the Historical Resources Board in 2005.

In 2002, CCDC awarded a contract to document the history of African-Americans within a study area that encompassed the East Village, Gaslamp Quarter, Marina and southern Core Districts to Mooney & Associates. The purpose of the study was to examine the buildings, environment and cultural landscape of the study area within the context of African-American history and culture. The recently released “Downtown San Diego African-American Heritage Study” identifies 17 standing buildings/structures that have significant association with the contributions and experiences of African-Americans in the downtown planning area between 1806 and 1960. The study also identifies 21 locations of former buildings, or non-standing resources, that were also significant in the history of this community and its members. The boundaries of this potential thematic historic district are Pacific Highway on the west, Broadway on the north, 15th Street on the east, and Harbor Drive on the south. It is possible that the designation of such an African-American Historic Thematic District will be considered by the Historical Resources Board in 2005.

In summation, a total of 411 structures have received some form of historic recognition. A breakdown by category follows:

National Register Individually-Listed Buildings/Structures	14
National Register District-Listed or Potential Contributors	81
National Register-Eligible Buildings/Structures	20
San Diego Register-Listed Buildings/Structures	125
San Diego Register Asian/Pacific Thematic Historic District Contributors	17
San Diego Register Potentially Eligible Buildings/Structures	78
San Diego Register Potential Warehouse District Contributors	59
San Diego Register Potential African-American District Contributors	<u>17</u>
Total Number of Potential Historical Properties	411

It should also be noted, that new information may result in additions to or deletions from the San Diego Register.

5.3.1.2 Archaeological Resources

Methodology

Several recent summaries discuss the archaeological resources of San Diego County and provide a reasonable background for understanding the prehistory and history of the downtown planning area. Prehistoric native populations are known to have inhabited and used the area. Over the years, native peoples were attracted to the coast by the abundance of various resources, including shellfish and other marine food sources. However, the historic settlement patterns and growth of San Diego led to the destruction or obscurity of much of the prehistoric record.

In published notes discussing San Diego as it existed in the 1920’s, pioneering San Diego Museum of Man archaeologist Malcolm Rogers noted that prior to the beginning of the museum’s archaeological survey, no excavations had been conducted as the City was built. He also noted that most of the materials in the museum’s collections were accumulated through the donation of accidental finds by citizens. Much of the area from “Old Town” south through the downtown planning area and along San Diego Bay had been developed for so long that most of the Native

American sites had been destroyed. However, in the past 20 years, investigations performed in the downtown area have identified the existence of prehistoric archaeological resources.

The Pueblo of San Diego was founded in 1769 and originally settled in the “Old Town” area. By 1850, however, the Americanization of San Diego began to develop. San Diego grew slowly over the next decade and began the development of a “New Town” closer to the bay. Alonzo Horton’s development of New San Diego (modern downtown) in 1867 began to swing the community focus away from “Old Town.” Historic archaeological resources uncovered in the downtown planning area represent the remains of downtown San Diego’s historic past and early urban development after 1848. Such remains include the foundations of public, private and commercial buildings; industrial features; privies, wells, and trash pits; and artifact scatters. Typical artifacts include bottles, ceramic dinnerware, personal items, household objects, hardware, and food remains. For the purpose of this discussion, an archaeological resource may include buried historic, as well as prehistoric, resources.

Local Regulatory Controls

As with historic buildings/structures, the San Diego Municipal Code contains three ~~ordinances~~ regulations-specific provisions intended to preserve and protect historical resources to the greatest extent feasible. ~~These ordinances regulations, which are contained in the Land Development Code. The first requires a~~ Site Development Permit is required for any development proposed for a site where a historical resource is present, or for a site within a historical district, unless such proposal is exempt as based on consistency with the Secretary of the Interior’s Standards (SDMC 126.0501 et seq. and 143.0201 et seq.). ~~The second requires implementation of the CEQA and the State CEQA Guidelines must be implemented for all proposed projects affecting “historical resources” as such resources are defined within that Act CEQA (SDMC 128.0101 et seq.). The third requires that~~ dDevelopment affecting designated historical resources or historical districts must provide full mitigation for the impact to the resource (SDMC 143.0251).

Human Remains

There are no historic cemeteries in the downtown planning area. In addition, no historic burials have been previously recorded in the downtown planning area. During downtown San Diego’s early history, people were interred in Cavalry Cemetery (located in Mission Hills above “Old Town”) and Mt. Hope Cemetery. Similarly, no prehistoric burials or cremations have been reported from the downtown planning area either. A 5,200 year old burial of a Native American woman, however, was recovered in 1990 during construction monitoring at the AT&SF Crosby Street Rail Yard, adjacent to the downtown planning area. Procedures for the treatment-disposition of human remains are set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5).

5.3.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to cultural-historical (historical and archaeological) resources if the goals, policies, objectives, or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion CULHIST-A Cause a substantial adverse change in a historical resource that is listed on, or determined to be eligible for listing on, the National Register or the California Register; listed on the San Diego Register; or that meets any of the following criteria:

- Is closely associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is closely associated with the lives of persons important in California and/or San Diego's past;
- Embodies the distinctive characteristics of a commonly-recognized type, period, region, or method of construction, or represents the work of any important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history; or

Significance Criterion CULHIST-B Cause an adverse change in an important archaeological site or disturb any human remains, including those interred outside of formal cemeteries.

5.3.3 ENVIRONMENTAL IMPACTS

5.3.3.1 Historical Resources (CULHIST-A)

Impact CULHIST-A.1
Impacts to Historical
Resources

The demolition or substantial alteration of a resource listed on, or formally determined eligible for, the National Register or California Register, including contributors to National Register or California Register Historic Districts; or listed on the San Diego Register, including contributors to San Diego Register Historic Districts; or that meet the CEQA criteria for historical resources would represent a significant direct impact. Future development within downtown pursuant to the proposed Downtown Community Plan could have a significant impact on historical resources. Although the impact cannot be accurately predicted on a plan-wide basis, impacts to historical resources may include substantial alteration, relocation, or demolition.

Although future development in accordance with the Downtown Community Plan could have a significant impact on historical resources, adoption of the Plan would not, in and of itself, have a significant impact. In fact, the emphasis placed by the Downtown Community Plan on conserving and integrating historical resources into downtown redevelopment would reduce impacts to historical resources that may have otherwise occurred with redevelopment.

With respect to historic conservation, the Downtown Community Plan would primarily rely on the regulatory process for conserving historic properties established by the Land Development Code and the preservation incentives provided properties listed on the National Register, California Register or

San Diego Register. In addition, the Downtown Community Plan would include the following goals and policies:

Goals

Goal 9.1-G-1: Protect ~~significant~~ historic resources to communicate downtown's heritage.

Goal 9.1-G-2: Encourage the rehabilitation and reuse of designated historic properties.

Policies

Policy 9.1-P-1: Maintain review procedures for projects potentially affecting National Register, California Register and San Diego Register properties and districts.

Policy 9.1-P-2: Offer incentives to encourage rehabilitation and reuse of historic properties, including floor area bonuses and exceptions to parking requirements.

Policy 9.1-P-3: Assist in the rehabilitation of historic properties through five on-going programs:

- Rehabilitation loans and grants,
- Low- and moderate-income housing loans and grants,
- Off-site public improvements,
- Façade improvements, and
- Grants and funds.

~~The Downtown Community Plan anticipates the loss of some properties listed on the City of San Diego Register in order to accommodate growth and population goals.~~ For City of San Diego Register properties, the Downtown Community Plan envisions that downtown's history would be ~~propagated~~ preserved through a combination of ~~rehabilitated~~ preserved buildings, historic districts, portions of older buildings integrated into new projects, emphasis on downtown's historic public realm, and on-going architectural and cultural history interpretive programs. Goals and policies in the Downtown Community Plan relating to the integration of downtown's heritage during redevelopment include:

Goals

Goal 9.2-G-1: Integrate designated historic resources into the downtown fabric while achieving policies for significant development and population intensification.

Goal 9.2-G-2: Preserve and enhance downtown's historic public realm in redevelopment planning.

Goal 9.2-G-3: Keep history alive through interpretive programs.

Policies

- Policy 9.2-P-1: ~~Where feasible and not in conflict with achievement of development and population intensity policies,~~ Incorporate elements of buildings in new projects to impart heritage.
- Policy 9.2-P-2: Partner with business, community, cultural, and historic organizations associated with designated historical districts to prepare and implement interpretive programs, such as walking and audio tours or a “story pole,” permanent displays and signage, information pamphlets, banners, and special events celebrating downtown’s history.
- Policy 9.2-P-3: Promote the adaptive reuse of intact buildings (designated or not) and/or significant elements, as a cultural and sustainability goal.
- Policy 9.2-P-4: Encourage the historic interpretation of various cultural resources as they are established over time, including but not limited to Asian-Pacific, African-American, warehouse buildings, etc.

~~Section 103.1907(d)(1) of t~~The proposed PDO would reinforce the incentives for preserving historic structures by exempting the area of historic buildings incorporated into new development from the allowed FAR. ~~Section 103.1909(1) of t~~The proposed PDO would encourage preservation of historic structures. ~~Section 103.1917 of t~~The proposed PDO establishes a specific review process for historic structures which are proposed to be altered by new development.

The intensity incentives contained in Chapter 3.2 of the proposed Downtown Community Plan would also encourage the preservation of historical resources. The Plan would allow the gross floor area of a National Register or California Register listed or eligible resource, or a San Diego Register listed resource, to be excluded from the calculation of the total FAR, so long as the resource is rehabilitated and not adversely affected by the proposed development. In this way, a developer can realize the full development potential of the underlying land use designation.

In addition to the Downtown Community Plan’s goals and policies for historic preservation, historical resource protections are provided by the Land Development Code and CEQA, which require an extensive regulatory process to avoid adverse impacts to designated historical resources to the extent feasible (described in Chapter 5.3.1.1). These provisions have resulted in redevelopment trends that creatively incorporate historic elements or entire structures into new developments. For instance, the historic Western Metal Building was incorporated into the Padres ballpark. The Candy Factory and historic elements of the Kvaas Construction Building were integrated into the developments of East Village Square, and the facades of the historic Station B will be rehabilitated and used in a new multi-story residential development in the Columbia neighborhood. Therefore, the enforcement of local, state and federal regulations aids in ensuring the conservation of significant historical resources.

5.3.3.2 Archaeological Resources (**CULHIST-B**)

Impact **CULHIST-B.1**
Impacts to
Archaeological Resources

If important archaeological sites occur at redevelopment sites, construction activities, such as grading and excavation, could result in significant impacts. Archaeological resources may be difficult to detect prior to construction activities, as they are located underground. In

the downtown planning area, archaeological resources have been found within inches of the ground surface. Therefore, the potential to affect important archaeological sites exists if a redevelopment activity requires even minimal grading and/or excavation. The likelihood of encountering archaeological resources is greatest on redevelopment sites that have been minimally excavated in the past (e.g., vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements; etc.).

Once encountered, historic artifacts associated with the archaeological feature or deposit would be documented in place, analyzed in a laboratory setting and prepared for curation in accordance with the City of San Diego's Historical Resources Guidelines (April 2001) and the State Office of Historical Preservation's Guidelines for the Curation of Archaeological Collections (1993). A Collection Management Plan would be required for projects which result in a substantial collection of historical artifacts and must address the management and research goals of the project, the types of materials to be collected and curated, and a sampling strategy that is acceptable to CCDC.

Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing the archaeological resources has been removed. In addition, building demolition and surface clearance could result in impacts to archaeological resources.

While there are no formal cemeteries or recorded burials downtown, prehistoric burials are possible. Consequently, the potential for encountering human remains during construction of redevelopment activities is considered low. Nevertheless, impacts to human remains as a result of the proposed Plan may occur.

5.3.4 MITIGATION MEASURES

Impact **HISTCUL-A.1** Impact to Historical Resources

~~Mitigation Measure **CULHIST-A.1-1**: Prior to issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, CCDC shall determine whether the affected building/structure meets any of the following criteria: (1) National Register Listed or formally determined recommended eligible, (2) California Register Listed or formally determined eligible, (3) San Diego Register Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. If the building/structure has been previously determined not to meet any of these four criteria, no additional action will be required. If the building/structure has been formally determined eligible for the San Diego Register by Historical Resources Board (HRB) staff, the building/structure will be referred to the Historical Resources Board for designation consideration. If no formal determination has been made under any of these four criteria, the applicant shall submit the following for review by CCDC staff: (1) Photographs of the site, including each building façade, with the street address clearly visible, details of windows, siding and eaves; and streetscape views; (2) Records of building permits which affected the exterior of the structure; and (3) A copy of the Assessor's Building Record from the County of San Diego. On the basis of this review, CCDC staff will determine whether to refer the property to the HRB staff for possible designation consideration. If,~~

~~after evaluation of the information, the HRB staff declines to refer the building/structure to the HRB, or if, after referral, the HRB declines to designate the building/structure, no further action is required.~~

~~For historic resources which are 45 years of age or older and which have not been evaluated for local, state and federal historic significance, CCDC shall consult with HRB to determine whether the resource is significant pursuant to CEQA.~~

For ~~structures-resources~~ that have been formally determined to be significant under federal, state, ~~or~~ local criteria, the following actions shall be carried out under direction of CCDC in consultation with HRB, as appropriate.

- **National Register-Listed/Eligible, California Register-Listed/Eligible**

~~**StructuresResources:** Structures-Resources listed on or formally determined eligible for the National Register or California Register and structures identified as contributing structures within a National or California Register District, shall be retained onsite and any improvements, renovation, rehabilitation and/or adaptive reuse of the historical property shall ensure its preservation according to the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings and Guidelines for Rehabilitation of Historic Buildings.~~

- **San Diego Register-Listed-Structures Resources:** ~~Structures-Resources listed on the San Diego Register shall be retained onsite to the extent feasible.~~ Any development that proposes to remove or significantly alter one of these historical structures shall comply with Chapter 14, Article 3, Division 2 of the San Diego Municipal Code which regulates Historical Resources.

~~For structures designated under local Criteria C or D, prepare an analysis to the satisfaction of the Agency that retention of the historical structure or substantial portions of the historical structure, such as its facade, and incorporation into the proposed development is infeasible. For structures designated under local Criteria A or B, prepare an analysis to the satisfaction of the Agency that retention of the historical structure or substantial portions of the historical structure, such as its facade, would not represent the grounds for which the structure was found to qualify for the local register. Such analysis shall be reviewed and commented on by the HRB staff.~~

~~Provide for relocation and preservation of the historical structure at a site and in a manner acceptable to the Agency, unless such relocation and preservation are proven infeasible to the satisfaction of the Agency, after consideration of the HRB staff's review and comments on the issue. Such relocation effort shall include making the structure available to any known interested, responsible party under procedures to be established by the Agency. Any adaptive reuse of a locally designated historical structure shall ensure its preservation according to applicable guidelines; and,~~

~~In the event that the Agency finds that the historical structure cannot be feasibly retained onsite or relocated, the applicant/developer shall provide for documentation of the historical structure before it is removed from the development site, including but not limited to photographic documentation of the exterior and interior of the~~

~~structure, and “as built” drawings of the structure according to the standards of the Historic American Building Survey (HABS). Such historical documentation shall be provided to the Agency and the HRB before a demolition permit is issued by the City for the structure.~~

Mitigation Measure HIST-A.1-2: If the potential exists for direct and/or indirect impacts to retained or relocated designated historical resources, the following measures shall be implemented.

I. Prior to Permit Issuance

A. Construction Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for historical monitoring during demolition and/or stabilization have been noted on the appropriate construction documents.
 - a. Demolition and/or sStabilization work can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits.
 - b. Physical description, including the year and type of structure, and extent of demolition and/or stabilization shall be noted on the plans.

B. Submittal of Treatment Plan for Retained Historic Resources

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Applicant shall submit a Treatment Plan to CCDC for review and approval that includes measures for protecting any historic buildings and/or building components during construction related activities (e.g. removal of non-historic features, demolition of adjacent structures, subsurface structural support, etc.). The Treatment Plan shall be shown as notes on all construction documents (i.e. Grading, Demolition and/or Building Plans).

C. Letters of Qualification have been submitted to CCDC

1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the historical monitoring program (i.e., Architectural Historian, Historic Architect and/or Historian), as defined in the City of San Diego Historical Resources Guidelines (HRG).
2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the historical monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Documentation Program (DP)

1. Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to CCDC for review and approval and shall include the following:
 - a. Photo Documentation
 - (1) Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions,

window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.

(2) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).

b. Required drawings

(1) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.

(2) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).

2. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical Monitoring program with the Construction Manager and/or Grading Contractor.

a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Historical Monitoring Plan (HMP)

a. Prior to the start of any work that requires monitoring, the PI shall submit an Historical Monitoring Plan which describes how the monitoring would be accomplished for approval by CCDC. The HMP shall include an Historical Monitoring Exhibit (HME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.

b. The HME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

c. Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.

d. The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request

shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

C. Implementation of Approved Treatment Plan for Historic Resources

1. Implementation of the approved Treatment Plan for the protection of Historic Resources within the project site may not begin prior to the completion of the Documentation Program as defined above.
2. The Historian and/or Architectural Historian shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historic resource to photo document the Treatment Plan process.
3. The Historian and/or Architectural Historian shall document activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to CCDC.
4. Prior to the start of any construction related activities, the applicant shall provide verification to CCDC that all historic resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report.
5. CCDC will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed.

D. Verification of approval of a Historical Commemorative Program (HCP), if applicable

1. The applicant shall submit documentation to CCDC for concurrent review and approval by HRB for a site-specific HCP, if mitigation for impacts to a designated resource is based on association with an important person, event or community history and the building would not be retained on-site.
2. CCDC shall provide a letter to the applicant approving or denying the proposal prior to the first preconstruction meeting and/or issuance of any construction permit. However, should CCDC grant conditional approval of the proposal, construction may be allowed to proceed, but the Certificate of Occupancy may not be issued until the historical commemorative program is approved.
3. Prior to the issuance of any Certificate of Occupancy, the applicant shall provide verification to CCDC that the HCP has been implemented in accordance with the approved program. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of photo documentation or appropriate reporting program.
4. CCDC will provide written verification to the RE or BI after the site visit indicating that the Certificate of Occupancy can issued.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to historical resources as identified on the HME. The

Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.

2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY incidents involving the historical resource. The RE shall forward copies to CCDC.
3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition arises which could effect the historical resource being retained on-site or adjacent to the construction site.

B. Notification Process

1. In the event of damage to a historical resource retained on-site or adjacent to the project site, the Historical Monitor shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI) .
2. The PI shall immediately notify CCDC by phone of the incident, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination/Evaluation of Impacts to a Historical Resource

1. The PI shall evaluate the incident relative to the historical resource.
 - a. The PI shall immediately notify CCDC by phone to discuss the incident and shall also submit a letter to CCDC indicating whether additional mitigation is required.
 - b. If impacts to the historical resource are significant, the PI shall submit a proposal for mitigation and obtain written approval from CCDC. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.
 - c. If impacts to the historical resource are not considered significant, the PI shall submit a letter to CCDC indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Night Work

A. If night work is included in the contract

1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
 - a. No Impacts/Incidents

In the event that no historical resources were impacted during night work, the PI shall record the information on the CSV and submit to CCDC via fax by 9am the following morning, if possible.
 - b. Potentially Significant Impacts

If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed.

- c. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 2. The RE, or BI, as appropriate, shall notify CCDC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring,
 - a. The preconstruction Treatment Plan and Documentation Plan (photos and measured drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report.
 - b. The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the resource. Updated forms shall be submitted to the South Coastal Information Center with the Final Monitoring Report.
2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.
4. CCDC shall provide written verification to the PI of the approved report.
5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC.

Mitigation Measure HIST-A.1-3: If a Designated Local Register historical resource would be demolished, the following measure shall be implemented.

I. Prior to Issuance of a Demolition Permit

- A. A Documentation Program (DP) shall be submitted to CCDC for review and approval and shall include the following:
 1. Photo Documentation
 - a. Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments,

decorative hardware. Photographs shall be of archival quality and easily reproducible.

b. Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).

2. Required drawings

a. Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.

b. One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).

B. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.

C. In addition to the Documentation Program, the Applicant shall comply with any other conditions contained in the Site Development Permit, as approved through the City's Historic Regulations contained in Chapter 14, Article 3, Division 2, which shall include, but not be limited to, one or more of a list of actions prepared and adopted by the HRB for demolition of the Local Register Resources.

Impact HIST-B.1 Impacts Archaeological Resources

Mitigation Measure HIST-B.1-1: If the potential exists for archaeological resources, the following measures shall be implemented.

I. Prior to Permit Issuance

A Construction Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for Archaeological Monitoring and Native American monitoring, if applicable, have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to CCDC

1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to CCDC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to CCDC requesting a reduction to the 1/4 mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Archaeologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Archaeological Monitoring Plan (AMP)
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Plan (AMP) which describes how the monitoring would be accomplished for approval by CCDC. The AMP shall include an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
 - c. Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.
 - d. The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during soil remediation and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to CCDC.
3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI and Native American representative, if applicable, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant, the PI shall submit a letter to CCDC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and the following procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, CCDC, and the PI, if the Monitor is not qualified as a PI.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, shall determine the need for a field examination to determine the provenience.
3. If a field examination is not warranted, the Medical Examiner shall determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains are determined to be Native American

1. The Medical Examiner shall notify the Native American Heritage Commission (NAHC). By law, only the Medical Examiner can make this call.
2. The NAHC shall contact the PI within 24 hours or sooner, after Medical Examiner has completed coordination.
3. NAHC shall identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information..
4. The PI shall coordinate with the MLD for additional consultation.
5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 24 hours after being notified by the Commission; OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.

D. If Human Remains are not Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with CCDC, the applicant/landowner and the Museum of Man.

V. Night WorkA. If night work is included in the contract

1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night work, the PI shall record the information on the CSVR and submit to CCDC via fax by 9am the following morning, if possible.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify CCDC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring,

a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

b. Recording sites with State of California Department of Parks and Recreation
The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.

4. CCDC shall provide written verification to the PI of the approved report.

5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts and Submittal of Collections Management Plan, if applicable

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 3. The PI shall submit a Collections Management Plan to CCDC for review and approval for any project which results in a substantial collection of historical artifacts.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with CCDC and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.
- D. Final Monitoring Report(s)
1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.
 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution.

~~**Mitigation Measure CUL-B.1-1:** Prior to issuance of any permit that could directly affect an archaeological resource, CCDC shall require the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with pre-historic Native American activities.~~

~~Step 1-Initial Evaluation~~

~~An initial evaluation for the potential of significant subsurface archaeological resources shall be prepared to the satisfaction of CCDC Staff as part of a Secondary Study for any activity which involves excavation or building demolition. The person completing the initial review shall be approved by CCDC staff. The initial evaluation shall consist minimally of a review of the following historical sources: The 1876 Bird's Eye View of San Diego, all Sanborn Fire Insurance Company maps, appropriate city directories that correspond to identified historical properties, and a records search at the South Coastal Information Center that is limited to the property boundaries. Historical and existing land uses shall also be reviewed to assess the potential for significant prehistoric and historic archaeological resources to be present.~~

~~No further action is required if the initial evaluation demonstrates there is no potential for subsurface resources. The results of this research shall be summarized in the Secondary Study.~~

Step 2 Testing

~~A testing program is required if the evaluation demonstrates that there is a potential for subsurface resources. The test program shall be made during the hazardous materials remediation or following the removal of any structure or surface covering which may be underlain by potential resources. The removal of these structures shall be conducted in a manner which minimizes disturbance of underlying soil. This shall entail a separate phase of investigations from any mitigation monitoring during construction.~~

~~The testing program shall be performed by a qualified Historical Archaeologist meeting the qualifications specified in Appendix B of the San Diego Land Development Code, Historical Resources Guidelines. The Historical Archaeologist must be approved by CCDC staff prior to commencement. Before commencing the testing, a treatment plan shall be submitted for CCDC approval that reviews the initial evaluation results and includes a research design. The research design shall include a discussion of field methods, research questions against which discoveries shall be evaluated for significance, collection strategy, laboratory and analytical approaches, and curation arrangements. All tasks shall be in conformity with best practices in the field of historic urban archaeology. A recommended approach for historic urban sites is at a minimum to remove fills and debris along interior lot lines or other areas indicated on Sanborn maps.~~

~~Security measures such as a locked fence or surveillance shall be taken to prevent looting or vandalism of archaeological resources as soon as demolition is complete or paved surfaces are removed. These measures shall be maintained during archaeological field investigations. It is recommended that exposed features be covered with steel plates or fill dirt when not being investigated.~~

~~The results of the testing phase shall be submitted in writing to CCDC and shall include the research design, testing results, significance evaluation, and recommendations for further treatment. Final determination of significance shall be made in consultation with CCDC Staff, and with the Native American community, if the finds are prehistoric. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. If no significant resources are found but results of the initial evaluation and testing phase indicate there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required. If significant resources are discovered during the testing program, then data recovery shall be undertaken prior to construction. CCDC Staff must concur with evaluation results before the next steps can proceed.~~

Step 3 Data Recovery

~~For any site determined to be significant, a Research Design and Data Recovery Program shall be prepared, approved by CCDC Staff, and carried out to mitigate impacts before any activity which could potentially disturb significant resources. The archaeologist shall notify CCDC of the date upon which data recovery will commence 10 working days in advance.~~

~~All cultural materials collected shall be cleaned, catalogued and permanently curated with an appropriate institution. All artifacts shall be analyzed to identify function and chronology as they relate to the history of the area. Faunal material shall be identified as to species and specialty studies~~

~~shall be completed, as appropriate. All newly discovered archaeological sites shall be recorded with the South Coastal Information Center at San Diego State University. Any human bones and associated grave goods of Native American origin shall, upon consultation, be turned over to the appropriate Native American group for reburial, in accordance with state regulations.~~

~~A draft Data Recovery Report shall be submitted to CCDC within twelve months of the commencement of the data recovery. Data Recovery Reports shall describe the research design or questions, historic context of the finds, field results, analysis of artifacts, and conclusions. Appropriate figures, maps and tables shall accompany the text. The report shall also include a catalogue of all finds and a description of curation arrangements at an approved facility. Finalization of draft reports shall be subject to CCDC Staff review.~~

~~Step 4—Monitoring~~

~~When important archaeological sites are suspected to be present on a project site but their presence cannot be confirmed prior to construction or demolition due to obstructions or spatially limited testing and data recovery, the applicant shall prepare and implement an archaeological monitoring program as a condition of development approval to the satisfaction of CCDC Staff, according to the financial considerations identified in Public Resources Code §21083.2, f. The archaeological monitoring program shall include the following provisions and components:~~

- ~~○The archaeological monitor shall be approved by CCDC Staff prior to any disturbance of the subject property.~~
- ~~○The archaeological monitor shall attend preconstruction meetings to review the monitoring program procedures with the construction manager.~~
- ~~○The monitor shall be present full-time during grading below street level until native soils are reached.~~
- ~~○When requested by the archaeological monitor, the applicant's contractor shall divert, direct or temporarily halt ground disturbance activities on the area of discovery to allow evaluation of potentially important archaeological sites. The archaeologist shall immediately notify CCDC Staff of such findings at the time of discovery. The significance of the discovered resources shall be determined by the archaeological monitor, in consultation with CCDC Staff, and the Native American community, if the finds are prehistoric. CCDC Staff must concur with the evaluation before grading activities may resume. For significant archaeological resources, data recovery procedures shall conform to those described in Step 3. The initial evaluation report, testing report, or research design from prior data recovery efforts may be used to guide site evaluations and data recovery following monitoring discoveries.~~
- ~~○A report describing the monitoring and results shall be submitted to CCDC within 30 days of the completion of monitoring. Proof of curation of artifacts shall be submitted to CCDC within 30 days of the completion of the curation.~~

- ~~oThe archaeologist shall complete the appropriate California Department of Park and Recreation site forms for any significant or potentially significant resources, and submit them to the South Coastal Information Center.~~

5.3.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impact **CULHIST-A.1** Impacts to Historical Resources

Level of Significance After Mitigation: Significant

Preservation, rehabilitation or adaptive reuse of National Register-listed/eligible historical structures or California Register-listed/eligible structures, consistent with the Secretary of the Interior's Standards and Guidelines, would reduce impacts to said historical structures to below a level of significance. ~~For San Diego Register Listed resources, where retention or relocation is determined infeasible pursuant to the City's Historic Resource Regulations as implemented through the City's Site Development Permit process, a Documentation Program (DP) shall be prepared and implemented pursuant to Mitigation Measure HIST A.1-3. While it is anticipated that the majority of the San Diego Register Resources would be retained or relocated, the potential exists for San Diego Register Listed resources to be demolished. It is considered speculative to determine whether implementation of Mitigation Measure A.1-3 would be able to reduce impacts to those resources to below a level of significance. Therefore, impacts to San Diego Register Listed are considered potentially significant and unmitigated. With respect to San Diego Register Listed Structures, if these actions are demonstrated, pursuant to a Site Development Permit, to be infeasible and the resource would be substantially altered, relocated or demolished in order to accommodate the site's redevelopment, documentation of the resource prior to its substantial alteration, relocation or demolition may or may not be sufficient to reduce the impacts to below a level of significance. Thus, in some circumstances, impacts to historical resources would be significant and unmitigated and, in other circumstances, impacts would be significant, but mitigated.~~

Impact **CULHIST-B.1** Impacts to Archaeological Resources

Level of Significance After Mitigation: Significant

~~Construction of projects within the Downtown development area could result in potentially significant adverse effects to unknown subsurface prehistoric or historic archaeological resources. Since the potential for an archaeological deposit cannot be confirmed unless structures are removed and subsurface excavation is conducted, monitoring pursuant to Mitigation Measure HIST-B.1-1 would be required during demolition of existing structures and foundations, as well as during all grading and excavation activities on a project site. In addition, should an archaeological deposit and/or feature be encountered during construction activities an Archaeological Data Recovery Program (ADRP) would be implemented to reduce direct impacts. However, because the nature and extent of impacts associated with future projects cannot be predicted at this time, implementation of an ADRP may or may not be sufficient to reduce the impacts to below a level of significance. Thus, while impacts are expected to be fully mitigated by implementation of Mitigation Measure HIST-B.1-1, isolated instances may exist where full mitigation cannot be achieved even with an extensive data recovery program. As a result, it is necessary to conclude that archaeological impacts may be significant.~~

~~Development encroachment into an important archaeological site consistent with the Land Development Code, with preservation through avoidance of the remaining portion of the important archaeological site to the extent feasible and implementation of a Research Design and Data Recovery Program for the portion that would be lost due to encroachment, would reduce impacts to important archaeological sites to below a level of significance. However, if preservation is infeasible and the resource would be lost, implementation of a Research Design and Data Recovery Program prior to destruction may or may not be sufficient to reduce the impacts to below a level of significance. Similarly, since the discovery of an important archaeological site during construction monitoring would preclude preservation of a portion of the site, implementation of a Research Design and Data Recovery Program may or may not be sufficient to reduce the impacts to below a level of significance. Thus, in some circumstances, impacts to important archaeological sites will be considered significant and unmitigated.~~

5.4 PUBLIC FACILITIES AND SERVICES

5.4.1 EXISTING CONDITIONS

5.4.1.1 Schools

Information regarding downtown-area schools was provided by written correspondence from the Instructional Facilities Planning Department of San Diego City Schools (refer to Appendix 2.4).

The downtown planning area is located within the jurisdiction of San Diego City Schools. Washington Elementary (K-5) and San Diego High School Educational Complex (9-12) are currently the only public schools located downtown. Washington Elementary is located in Little Italy and San Diego High School Educational Complex is located in East Village. Perkins Elementary (K-5), Sherman Elementary (K-5), Roosevelt Middle School (6-8), and Memorial Junior High (6-9) serve parts of the downtown planning area, though they are not located within its boundaries. The locations of the public schools serving the downtown planning area are shown in Figure 5.4-1.

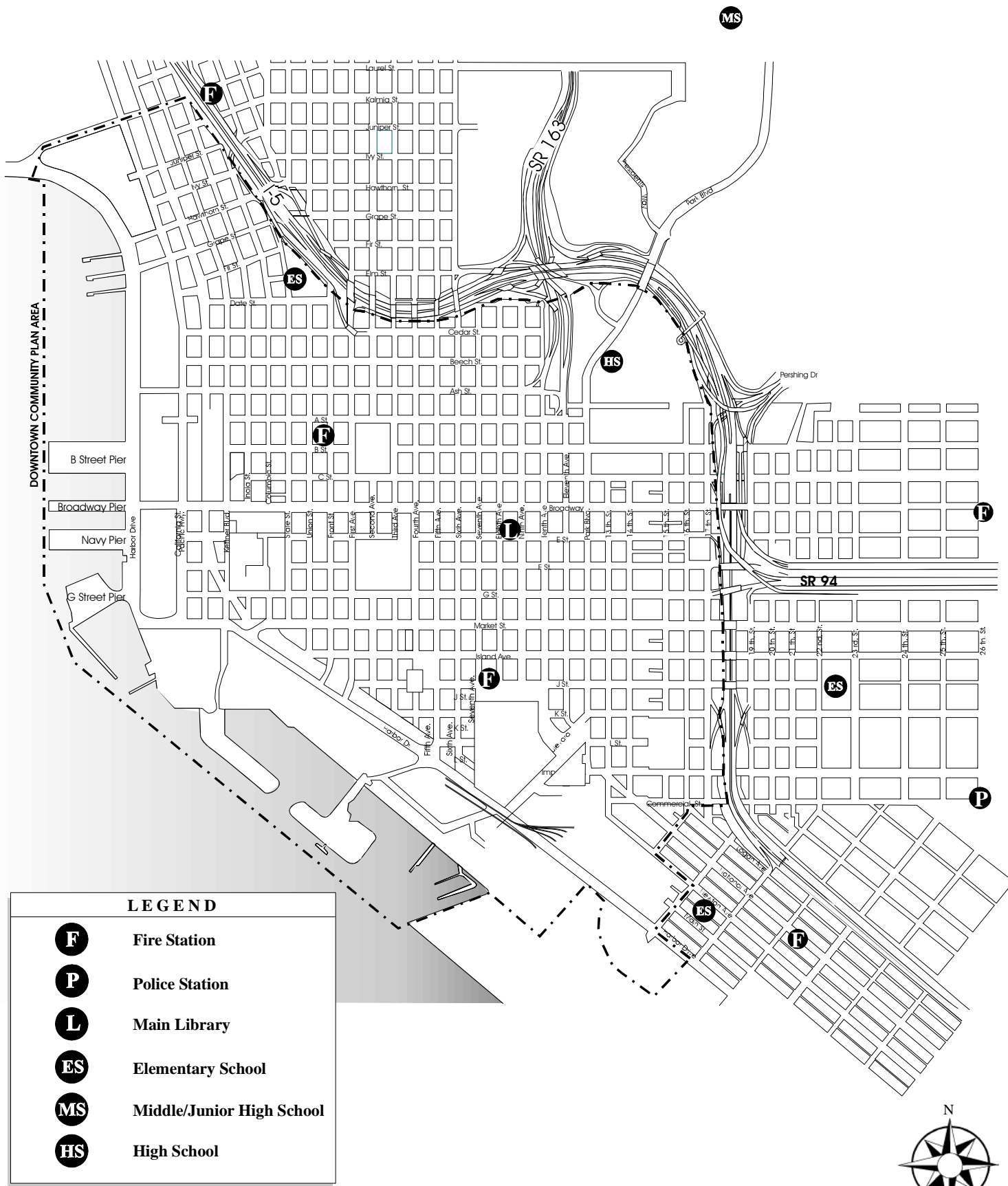
Garfield High School was not included in the analysis because it is a continuation school that draws students from throughout the district. Students are referred there by counselors at their previous school, so unlike the other schools serving the downtown planning area, admission to Garfield is not based on one's address.

The capacity of the public schools serving the downtown planning area and the current enrollment are provided in Table 5.4-1. As indicated in the table, all schools are currently within their design capacity.

TABLE 5.4-1
School Enrollment and Capacity

SCHOOL	ENROLLMENT OCTOBER 2004	2004-2005 CAPACITY
Perkins Elementary School	400	564
Sherman Elementary School	630	1051
Washington Elementary School	291	414
Roosevelt Middle School	1052	1404
Memorial Junior High School	1491	1626
San Diego High School	2861	2871

Source: San Diego City Schools, Instructional Facilities Planning Department. 2005



Source: ProjectDesign Consultants, 1/13/2005



Existing Downtown Public Service Facilities _____ Figure 5.4-1

5.4.1.2 Libraries

Information regarding downtown-area libraries was provided by written correspondence from the San Diego Public Library (Appendix 2.4) and the City of San Diego website.

Downtown is located within the San Diego Public Library system. The Central Library, located at 820 E Street, serves as the local branch for the project area and also functions as headquarters for all 34 branches in the San Diego Public Library system. The Central Library contains 144,524 square feet, approximately 700,000 books, media (CDs, DVDs, etc.) and magazines (the most of any branch library), and staffs 140 full time employees. The Central Library offers a variety of services such as youth and adult programming, patent workshops, live musical and theatrical performances, career workshops, book talks, local author events, exhibitions and displays, art exhibits, civic meetings, educational symposiums, and instructional classes. This library is currently very active; however, it is compromised by its aging infrastructure and inability to adequately expand to meet the needs of a growing downtown population.

The Central Library, built in 1954, has aging wiring and plumbing, has noticeably outgrown its 144,524 square feet, and is unable to expand further. Programming is often limited because the library has relatively few computers (84) and the building does not provide parking. Taking this into account, the San Diego Public Library and the City of San Diego made the decision to relocate the Central Library to a new and larger facility. Construction for the new Main Library, to be located in the proposed Ballpark sub-district is anticipated to be completed by the year 2010. Refer to Table 5.4-6 for more information on the new Main Library.

5.4.1.3 Fire Protection/Emergency Medical

Fire protection and emergency medical service information is provided by the City of San Diego Fire Department (SDFD), which provides fire protection, rescue, emergency medical services, and hazardous materials response within the downtown planning area (refer to Appendix 2.4).

The SDFD operates five fire stations whose service boundaries are either wholly or partially contained in downtown planning area. Fire Stations #1 and #4 are located within downtown, and Fire Stations #3, #7, and #11 are located just outside of downtown in neighboring communities. Each station is described below and illustrated on Figure 5.4-1.

Station #1 is located at 1222 First Avenue (First Avenue and B Street) and is equipped with two engines, one 100-foot aerial ladder truck, one light and air apparatus, one battalion chief vehicle, one explosive device technician apparatus, one canteen apparatus, one chemical response apparatus, and one utility apparatus.

Station #4 is located at 404 Eighth Avenue (Eighth Avenue and J Street) and is equipped with one engine and one heavy rescue apparatus.

Station #3 is located at 725 Kalmia Street and is equipped with one engine.

Station #7 is located at 944 Crosby Street (Crosby Street and National Avenue) and is equipped with one engine.

Station #11 is located at 945 25th Street and is equipped with one engine.

The goal of the SDFD is to maintain a per capita ratio of one firefighter per 1,000 residents. Currently, the downtown population is 27,500 which requires 28 firefighters to meet this standard. In total, 29 firefighters, two emergency medical technicians, and two paramedics currently serve the downtown planning area. Therefore, the SDFD is presently within its established per capita ratio goal.

The quality of fire and emergency medical services to the downtown planning area is evaluated by the average response time to an emergency call. Response times are based on the time from notification of the incident to the arrival of the first emergency vehicle on scene. As is illustrated in Table 5.4-2, the SDFD has established target response times that each emergency vehicle should meet. In the downtown planning area, the average response time to an emergency call is within the target response time for each emergency vehicle.

TABLE 5.4-2
San Diego Fire Department Response Times in the
Downtown Planning Area

FIRST EMERGENCY VEHICLE TO ARRIVE ON SCENE	AVERAGE RESPONSE TIME	TARGET RESPONSE TIME
Structure Fire		
First Engine Page to On Scene	3:58 minutes	6 minutes
First Ladder Page to On Scene	5:21 minutes	9 minutes
Effective Fire Force Page to On Scene	6:22 minutes	12 minutes
Medical Priority		
First Engine Page to On Scene	3:44 minutes	8 minutes
First Advanced Life Support Ambulance Dispatch to On Scene	6:26 minutes	12 minutes

Source: San Diego Fire Department, Fire Marshal. 2004

The SDFD is in the process of securing sites for two new fire stations in the downtown area. One site is being sought on the west side of Harbor Drive while another is targeted for East Village. ~~Recently, CCDC has agreed to allow property it owns in East Village at the northwest corner of the intersection of Broadway and 14th Street to be used for a future fire station.~~

5.4.1.4 Law Enforcement

The following discussion is based on information provided by the City of San Diego Police Department (SDPD) whose duties downtown include preventing crime, apprehending criminals, and developing community partnerships. (Refer to Appendix 2.4).

The Central Division is the police station that serves downtown. The Central Division is located at 2501 Imperial Avenue (Figure 5.4-1) has a staff of ~~178-160~~ officers, serves a population of approximately ~~85,900~~86,700, and encompasses 9.7 square miles. The officers are made up of ~~patrol~~

~~officers~~, detectives, ~~community service officers~~, sergeants, lieutenants, and a captain. There are also three administrative personnel assigned to the Central Division. The Central Division is divided into beats, and the downtown planning area falls into the “520” service area, which has approximately 95 patrol officers.

At any one time in the downtown planning area, there are at least seven officers and one sergeant on patrol. When police protection services are in high demand, such as Friday or Saturday night at 10:00 pm, there can be as many as 22 officers and three sergeants on patrol downtown.

Citywide, the goal of the SDPD is to maintain an officer to population ratio of two officers per 1,000 residents. Currently, the ratio is ~~3.5~~1.55 officers per 1,000 residents, which ~~exceeds~~is less than the established goal. SDPD has recommended an increase in staff of ~~38~~57 officers over the next ~~five~~fifteen years, plus equipment, and an ~~increase~~additional five in civilian staff as well.

Like fire protection services, the quality of police protection services to the downtown planning area is evaluated by the average response time to an emergency call. According to SDPD, the Central Division’s average response times for emergency and Priority 1 calls is somewhat less than the City-wide average due to the shorter distances that officers travel to get to the calls.

5.4.1.5 Water

Regional Water Supply

The regional water suppliers serving downtown include the Metropolitan Water District (MWD) and the San Diego County Water Authority (SDCWA). MWD is the principal supplier supplying water to many water agencies throughout southern California including the SDCWA. MWD receives its water from the Colorado River via the Colorado River Aqueduct and from northern California via the California Aqueduct, which is part of the State Water Project. The SDCWA sells water to 27 member agencies.

It was originally believed that the Colorado River could yield approximately 20 million acre feet (MAF) per year, however, it is now clear that the river can only yield approximately 15 MAF per year. Although California’s allotment from the Colorado River is 4.4 MAF annually, California currently takes approximately 5.2 MAF annually from the Colorado River by also relying on surplus water not used by Arizona and Nevada. These states are now requiring more water, and therefore California can no longer rely on receiving their surplus.

Long-term water supply in southern California continues to be a concern because the region is so heavily dependent on remote water sources. In San Diego County, less than ten percent of water demand is met from local sources.

MWD has set forth a preferential right to water for each of its member agencies. As calculated by MWD, SDCWA currently has a preferential right to approximately 15.5 percent of MWD’s supply, but purchases approximately 28 percent. Under preferential rights, MWD could allocate water without regard to historic water use or dependence on MWD (although MWD has stated that it is prepared to provide the SDCWA’s service area with adequate supplies of water to meet expanding and increasing needs in the years ahead). Therefore, SDCWA and its member agencies are taking

measures to reduce dependence upon MWD through development of additional supplies and a water supply portfolio that would not be jeopardized by preferential rights allocation.

The SDCWA is taking numerous steps to meet future demands and diversify its supplies. Implementation of water conservation measures is one of the most cost effective ways of reducing demand. SDCWA entered into an agreement with the Imperial Irrigation District (IID) for the long-term transfer of conserved Colorado River water to SDCWA. Imperial Valley farmers who voluntarily participate in the program will conserve Colorado River water, which will then be sold and transferred to the SDCWA. Delivery of 10,000 acre-feet (AF) of conserved water was transferred to SDCWA in 2003. In 2004, 20,000 AF will be conserved and delivered to the SDCWA. The quantities will increase annually to 200,000 AF by 2021 and remain fixed for the duration of the 45-year initial term. SDCWA will also receive 77,700 AF per year of conserved water from projects that will line the All American Canal and Coachella Canal. The project will reduce the loss of water that currently occurs through seepage; the conserved water will go to the SDCWA. This will provide the SDCWA with an additional 8.5 MAF of water over the 110-year life of the agreement. Another way SDCWA may increase water supply is by using water produced by a proposed Seawater Desalination Project. The Desalination Project is anticipated to produce 56,000 AF annually of new water supply generated from seawater drawn in by the Encina Power Station cooling water circulation system from the Pacific Ocean via the Agua Hedionda Lagoon. The Desalination Project would provide a new source of high quality water that would meet or exceed state and federal standards, which would be conveyed from the plant to the local and regional water distribution systems.

The SDCWA produced an Urban Water Management Plan in the year 2000 which predicted water supply and demand through the year 2020. In the year 2000, water demand within the SDCWA service area was 695,000 AF. Based on population projections of SANDAG's 2020 Cities/County Forecast, SDCWA projects the total demand in 2020 to be 813,000 AF. SDCWA has projected that in the year 2020 its imported water supplies would be 589,500 AF. To supplement this and meet the additional need, SDCWA projects that they will have a local water supply (from surface water, water recycling, groundwater, and seawater desalination) of 223,500 AF.

City of San Diego

The City of San Diego Water Department, which serves downtown, treats and delivers more than 200,000 MAF of water annually. The Water Department delivers potable water throughout an area of approximately 330 square miles. In addition to delivering potable water, the City has a recycled water program for non-potable water. During an average year the City's water supply is made up of approximately 10 to 20 percent of local rainfall, with the remaining amount imported from the MWD and SDCWA. Water is transferred from MWD through SDCWA-operated pipelines to one of three water treatment plants operated by the Water Department.

The use of local water by the Water Department to meet water demand is affected by availability and water resource management policies. The Water Department's policy is to first use local water when available, and to reduce imported water purchases and costs. The Water Department also operates emergency and seasonal storage programs in conjunction with its policy. The Water Department maintains and operates nine local surface raw water storage facilities. On average in the San Diego region, approximately 13 percent of the local precipitation produces surface runoff to streams and

Water Department reservoirs. Approximately half of the runoff is used for the municipal water supply, while the remaining runoff evaporates during storage or spills over the dams and returns to the Pacific Ocean. The Water Department also relies on recycled water for non-potable uses. The Water Department has a combined treatment capacity of 15 mgd from its two Reclamation Plants, and as of December 2003, it had over 292 recycled water meters in operation, and distributed 4,187 AF of recycled water, primarily for landscaping use. The Water Department has also established a Water Conservation Program which accounts for approximately 21,000 AF per year of water savings. Possible future water supplies include groundwater and water transfers.

The City of San Diego has developed an Urban Water Management Plan (UWMP) to assist in forecasting and planning for future water demand. The most recent version of the UWMP was approved in year 2000 and the City is currently in the process of updating the UWMP for year 2005. Based on the 2000 UWMP, the forecasted normal year water demands compared with the projected supplies for the Water Department are shown in Table 5.4-3.

TABLE 5.4-3
Water Department Projected Water Supply and Demand during Normal Year
for Period 2005 to 2025 (ac-ft per year)

SUPPLY SOURCE	2005	2010	2015	2020	2025
Imported Water Supply	204,420	204,724	217,615	231,126	252,958
Local Surface Water Supply	23,000	23,000	23,000	23,000	23,000
Local Recycled Supply	6,720	15,000	15,000	15,000	15,000
Total Required Supply	234,140	242,724	255,615	269,126	290,958
Total Projected Demand	234,140	242,724	255,615	269,126	290,958

Source: City of San Diego Water Department, 2004.

The normal, single, and multiple dry year scenarios, within a 20- year projection, are shown in Table 5.4-4, which demonstrates that supplies will be adequate to meet future demands in dry year periods for the Water Department.

On January 1, 2002 Senate Bill 610 (SB 610) and Senate Bill 221 (SB 221) took effect. The intent of SB 610 and SB 221 is to improve the link between information on water supply availability and certain land use decisions made by local jurisdictions. SB 610 requires the preparation of a Water Supply Assessment (WSA) Report for projects that meet any of the following criteria: (1) residential project with more than 500 units, (2) shopping center or business employing with more than 1,000 persons or more than 500,000 square feet of floor space, (3) office building with more than 1,000 persons or more than 250,000 square feet of floor space, (4) hotel or motel with more than 100 rooms, (5) industrial project housing more than 1,000 persons, covering more than 40 acres, or with more than 650,000 square feet of floor space, (6) mixed use project with one or more of the projects specified previously, or (7) project that would demand an amount of water equivalent to, or greater than, the amount required for 500 dwelling units. SB 221, requires affirmative written verification of sufficient water supply.

As a result of the SB 610 requirements, CCDC will send a memo to the Principal Water Resource Specialist at the Water Department requesting a WSA report for any project which meets the SB 610 criteria. The memo will include a project description. This will assure that water supply is assessed before any project meeting the above criteria would be approved.

Downtown Planning Area

Water supplied to downtown is first treated at the Alvarado Water Treatment Plant. Operated by the Water Department, this facility meets the regional demand for treated water by producing between 90 and 150 million gallons per day (mgd) for the entire City of San Diego. Currently, upgrades to this facility include, among others, constructing new filters and treatment facilities, rehabilitating pump stations, and replacing the existing Earl Thomas Reservoir. Facility improvements are anticipated to be completed in 2008, and will ultimately increase water supply reliability, meet or exceed strict water quality regulations, and have a useful life of 75 years. In addition, the capacity of the treatment plant will increase to 200 mgd.

In the downtown planning area, the average water demand in 2003 amounted to 8.62 million gallons per day. This quantity of water was delivered to the area through a system of transmission and distribution lines that range in diameter from six to 30 inches.

**TABLE 5.4-4
Water Department Projected Water Supply and Demand during Single and Multi-Year Dry Period (ac-ft per year)**

SUPPLY SOURCE	NORMAL WATER YEAR (2025)	SINGLE DRY WATER YEAR (2025)	MULTI-YEAR DRY PERIOD			
			2010	2015	2020	2025
Imported Water Supply ¹	252,958	291,292	281,946	304,024	310,381	294,427
Local Surface Water Supply ²	23,000	13,200	13,200	8,200	7,200	5,900
Local Recycled Supply	15,000	15,000	15,000	15,000	15,000	15,000
Total Required Supply	290,958	319,492	305,473	322,552	335,454	315,327
Total Projected Demand	290,958	319,492	305,473	322,552	335,454	315,327

¹ Includes deliveries of both Metropolitan and Water Authority supplies. Metropolitan's March 2003 Report, within which it states that they will have adequate supplies to meet dry year demands within its service area over the next 20 years.

² Multiple dry year local surface water based on 1955-1958, and 1962-65 local supply data, assumes a dry year(s) following a 4-year period of average runoff.

Source: City of San Diego Water Department, 2004.

Potable water pipelines are located underneath the majority of downtown's streets mimicking the above-ground street grid pattern. Major distribution lines surround the planning area and include the Pacific Highway Pipeline (30 inches), which runs along the western and southern boundaries of the planning area. The Balboa Park Pipeline (24 inches) comes into the downtown planning area through Ninth Avenue to serve the northeastern and eastern portions of the planning area. Other large diameter pipelines (16 inches) are located along Harbor Drive, near the Ballpark, and around Horton Plaza.

The San Diego Water Department operates a Capital Improvement Projects (CIP) program that replaces water lines downtown. As part of ongoing maintenance, the CIP program replaces aging pipe that is no longer suitable for delivering water efficiently. Another goal of the CIP program is to “upsized” small-diameter pipe with larger pipe in areas requiring more supply capacity. For instance, six-inch pipe is now considered too small to adequately supply parts of the downtown planning area. This pipe size, which occurs in isolated areas in the Columbia and East Village districts, is being systematically replaced with larger diameter pipe in order to accommodate new and more intense development.

5.4.1.6 Wastewater

Regional

Wastewater generated by the downtown planning area is treated at the Point Loma Wastewater Treatment Plant (PLWTP). Located on a 40-acre site in Point Loma, the PLWTP’s service area spans 450 square miles and uses an advanced primary treatment system to treat wastewater. The treatment capacity of the PLWTP is 240 mgd and currently treats approximately 180 mgd of wastewater per year. In the process of treating wastewater, the PLWTP is required by the EPA to limit the total suspended solids that are discharged into the ocean to 13,600 metric tons per year. This requirement is called the Mass Emission Rate (MER). Currently, the PLWTP discharges 10,400 metric tons per year and is well under the MER. It is estimated that the PLWTP will exceed the MER in 2025.

By the year 2025, the Metropolitan Wastewater Department (MWW) plans to construct the South Bay Wastewater Treatment Plant (SBWTP) next to the South Bay Water Reclamation Plant to treat additional wastewater flow and enable the PLWTP to continue to meet the MER requirement.

Wastewater is currently transported to the PLWTP through a network of underground collector pipes, trunk lines, and force mains. Collector pipes have diameters of usually 8 to 12 inches and are the pipes to initially receive wastewater generated by residences, businesses, and industrial facilities. Collector pipes transport wastewater to trunk lines, which are much larger in diameter (15 inches or larger). Trunk lines receive the collective wastewater flow from collector pipes in a given service area and ultimately transport it to Pump Station 2. Pump Station 2 is located under Harbor Drive and pumps wastewater received from trunk lines into the force mains, which, in turn, transport the wastewater to the PLWTP. Pump Station 2 has a peak pumping capacity of 432 mgd, and presently pumps 220 mgd of peak wet weather flow (50% capacity) or 180 mgd of average daily flow (42% capacity).

Downtown Planning Area

Based on current population and employment figures (population: 27,500; employment: 74,500), the estimated wastewater flow from downtown is 5.1 mgd. This volume of effluent is collected and transported within the downtown area by means of a network of underground collector pipes and nine trunk lines.

The collector pipes downtown are located beneath nearly every major street in the planning area. They are composed of either vitrified clay, PVC, or plastic-lined concrete. MWW operates a

program through its Capital Improvement Projects division that systematically replaces collector pipes as they age or require “upsizing” to a larger diameter.

5.4.1.7 Solid Waste

Solid waste disposal information for the following discussion was provided by the City of San Diego Environmental Services Department (ESD) that, along with private collectors, provides solid waste disposal services for downtown (refer to Appendix 2.4).

Solid waste generated downtown is collected by private collection companies. Private collectors have the option of disposing solid waste in any of the region’s landfills including Miramar, Sycamore, and Otay. However, as Miramar Landfill is closest to the downtown area, it is the least expensive landfill to deliver to in terms of transportation costs. Therefore, it is assumed by the ESD that the great majority of solid waste is disposed of at the Miramar Landfill. According to the ESD, the Miramar Landfill has a maximum capacity of approximately 56.5 million cubic yards and a remaining permitted capacity of 19 million cubic yards of solid waste. The ESD anticipates that the Miramar Landfill will reach its maximum capacity by November 2011.

Solid waste generated after Miramar Landfill closes will go to Sycamore Canyon Landfill. The City has an agreement with this landfill to accept a percentage of City waste that the City has control over or is responsible for. The agreement is good until Sycamore Landfill closes, which is expected to be 2017 unless it gets approval to increase its capacity.

As is illustrated in Table 5.4-5, downtown is currently estimated to generate approximately 71,067 tons of solid waste per year.

TABLE 5.4-5
Estimated Annual Solid Waste Generated by the
Downtown Planning Area

LAND USE TYPE	EXISTING LAND USES (2004)	SOLID WASTE GENERATION RATE	TOTAL SOLID WASTE (TONS/YEAR)
Residential (unit)	14,600	1.2 tons/year	17,520
Retail (square feet)	2,658,000	0.0028 tons/year	7,442
Hotels (square feet)	5,280,000	0.0045 tons/year	23,760
Office (square feet)	13,144,000	0.0017 tons/year	22,345
TOTAL Estimated Solid Waste Generated per Year			71,067

Source: City of San Diego, Environmental Services Department. 2004
CCDC, Downtown Community Plan. 2005

5.4.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to public services and utilities if the goals, policies, objectives

or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion PS-A Result in a significant physical change associated with expanding a public service to meet the anticipated demand created by the proposed Plan.

In accordance with Sections 15126.2(a) and 15382 of the CEQA Guidelines, impacts related to public services are evaluated in light of whether the impact would result in a physical change in the environment. For instance, the need to add staff or equipment to meet a future need would only be considered a significant environmental impact if it would precipitate the need to construct a new facility which could result in a physical change in the environment. If the additional staff and equipment can be housed within existing buildings, no physical change would result and no environmental impact would occur. Where additional facilities may be required but the location or extent of such a facility is unknown, Section 15145 of the CEQA Guidelines states that potential impacts need not be specifically addressed in an EIR if the assumptions needed to analyze potential effects are considered too speculative.

5.4.3 ENVIRONMENTAL IMPACTS

5.4.3.1 Demand for New or Expanded Public Service Facility (PS-A)

Schools

Implementation of the proposed Downtown Community Plan would result in additional residential units, which would generate school-aged children attending local public schools. Student generation factors were used to calculate the average number of students that would result from residential buildout of the proposed Community Plan. The school district estimates that future residential development downtown would generate elementary-aged students (K-5th) at a rate of 0.026 per unit and secondary-aged students (grades 6th-12th) at a rate of 0.018 per unit. Using these rates, the future 53,100 residential units are anticipated to generate approximately 1,381 students enrolled in public elementary schools. Based on Table 5.4-1, the three elementary schools serving downtown (Perkins Elementary, Sherman Elementary, and Washington Elementary) have a combined unused capacity of 708 students. Therefore, the additional students generated by new residential development downtown would exceed the capacity of the present elementary schools serving downtown by 673 students. Assuming an elementary school normally accommodates around 600 students, buildout of the downtown residential component would require construction of a new elementary school. However, no site for a future school has been identified. Thus, pursuant to Section 15145 of CEQA, analysis of physical changes which may occur from a future elementary school would be speculative and no further analysis is required. However, construction of a new school would be subject to an independent environmental analysis pursuant to the California Environmental Quality Act (CEQA) at the time the new school is planned for construction.

Using the school district's rates, the future 53,100 residential units are anticipated to generate approximately 956 secondary-aged students. Middle schools serving the downtown planning area have a total capacity of 3,030 students. Assuming half of the secondary students would attend

middle school; the 478 students generated downtown would not exceed the remaining middle school capacity of 487 students. As indicated in Table 5.4-1, the high school serving the area has a remaining capacity of 10 students. Thus, the 478 high school students generated by downtown residential development would exceed the capacity of the existing high school. The need for a new high school is less clear than the elementary school because of several factors. First of all, Lincoln High School will be reopening in 2006 which will result in revisions to boundaries of San Diego High School. In addition, it is not uncommon for high school students to attend high schools outside of their assigned neighborhood attendance area. However, even if a new high school would be required, evaluation of physical impacts from such a school would be speculative and are not addressed in this EIR.

Libraries

As the proposed Downtown Community Plan is implemented, new residential, mixed-use, commercial, and industrial uses would be developed. The population of downtown would increase to a total of 89,100 people. There would be a corresponding increase in demand for library services, including the possible need for additional library space.

The construction of the new Main Library would alleviate the demand created by the proposed Downtown Community Plan for library services downtown. The new Main Library is planned to be constructed in the proposed Ballpark neighborhood, located on the block bounded by Eleventh and Twelfth Avenues and J and K Streets. The building is proposed to be nine stories, containing 495,942 square feet, and having 250 onsite parking spaces in addition to 250 more spaces across the street and 2,000 parking spaces located in various parking structures in the immediate vicinity. The total collection size would grow by over 40,000 resources to 1,240,598. The number of computers would quadruple to 407. In addition, the new Main Library would have a 350-seat auditorium, six meeting rooms, 13 study rooms, and space for literary services, an art gallery, and special events. The new Main Library would meet downtown's demand for new libraries.

The branch system is based on the premise that the central or main library is the main backup for the entire system. On the first floor of the new Main Library, a "popular library" would help serve the expanding residential population downtown and would effectively act as a branch library within the new Main Library

The new Main Library would be within two miles from the furthest residential areas in the downtown planning area, located in the northern Little Italy. This distance is considered to be the point where library usage diminishes. As the boundaries of the downtown planning area are within two miles of the new Main Library site, the library would adequately accommodate all downtown residents and no new or expanded libraries would be needed.

The new Main Library is anticipated to adequately serve downtown's residential population at buildout; therefore, no new or expanded library facilities would be needed. Furthermore, the environmental impacts of the new Main Library were addressed in a Secondary Study which was prepared by CCDC in May 2001. This study concluded that the construction of the library would have no significant environmental impacts that could not be reduced to below a level of significance. The proposed Plan allows for smaller, topical libraries throughout downtown. However, no specific additional library sites are identified in the proposed Plan. Thus, it is impossible to identify any

significant physical changes which may accompany construction of these new facilities. Pursuant to Section 15145 of CEQA, analysis of physical changes which may occur from future topical library construction would be speculative and no further analysis is required. However, future library facilities would be subject to an independent environmental analysis pursuant to the California Environmental Quality Act at the time they are planned for construction.

Fire Protection/Emergency Medical

Under the per capita standards currently used by the Fire Department, implementation of the Proposed Plans and Ordinances would require additional 56 fire personnel to serve the additional estimated increase of 61,600 residential units, 16.7 million square feet of office space, 3.4 million square feet of retail space, and 11,200 hotel rooms. The exact number of additional personnel is difficult to forecast. Potential improvements in fire fighting and/or design measures included in future buildings could allow the per capita criteria to increase.

Policy 8.2-P-1 calls for the collection of Development Impact Fees (DIF) for all developments to help pay for needed fire facilities. The proposed Community Plan would lessen impacts on fire fighting services by integrating new fire facilities into mixed-use development projects to the extent possible (Policy 8.2-P.3). Policy 8.2-P-4 encourages special event management to minimize conflict with fire equipment access throughout downtown.

Increased traffic congestion as a result of growth downtown would hinder timely responses to emergency calls. The run volume for the downtown response units has already increased with the current level of growth of the downtown area. In addition, the increase in the number of high rises (particularly residential) would result in an increase in medical aids and a decreased ability to respond to other emergencies.

While the two new fire stations which may be built downtown would result in physical impacts, their construction would not be directly related to the proposed Plan. Furthermore, insufficient information exists to accurately determine the any physical impacts which may occur from either of the proposed stations. ~~As no site has been selected for a station west of Harbor Drive, no evaluation can be made. While the potential site in East Village site appears to be well suited for a fire station, further environmental review would be conducted when a formal plan is proposed. The property is paved and formerly supported a used car lot. It is located opposite the City's police headquarters and is a block away from City College. The area to the south is occupied by the Salvation Army Adult Rehabilitation Center; a Salvation Army outlet is located to the west across 13th Street. A new residential development, known as Union Square, is located to the east, across 14th Street. Older residential apartments are located to the north.~~

Law Enforcement

Similar to fire protection services, population growth and increased residential, commercial, industrial, and institutional uses would correspond to an increased demand for law enforcement services. The Downtown Community Plan would result in an increase in population to 89,000. Therefore, to maintain the goal of two officers per 1,000 residents, the SDPD would require an additional 83 officers to serve the downtown area (520 service area). City-wide, the SDPD has an officer to population ratio of ~~1.65~~1.55, which falls short of the 2.0 goal ratio. To achieve the ratio

goal of two officers per 1,000 residents, the SDPD has requested the addition of ~~35-57~~ officers. The addition of ~~35-57~~ officers for the entire City would not be sufficient to meet the demand generated by the Downtown Community Plan. Even if all of the ~~35-57~~ officers were assigned to the downtown area, downtown would require an additional 48 officers to meet the goal service ratio.

To keep up with anticipated demand, the SDPD would need additional resources such as personnel, equipment, and training. The need for a new SDPD substation has not been identified. If such a need is identified in the future, the substation will be subject to an independent environmental analysis pursuant to the CEQA. Pursuant to Section 15145 of CEQA, analysis of physical changes which may occur from future police facility construction would be speculative and no further analysis is required.

Water

Buildout under the proposed Plan would increase the demand for treated water downtown from approximately 8.62 million gallons per day (mgd) to approximately 18.89 mgd. As this additional demand would not have been considered in SDCWA's Urban Water Management Plan (UWMP), the 2020 demand forecast by the UMWP would increase 1.4% (11,500 AF) from 813,000 to 824,500 AF. As indicated earlier, the UWMP projects that in the year 2020 its imported water supplies would be 589,500 AF. To supplement this and meet the additional need, SDCWA indicates that it will have a local water supply (from surface water, water recycling, groundwater, and seawater desalination) of 245,000 AF (including the additional demand resulting from the proposed Community Plan). This additional demand would not represent a substantial increase in the challenge of meeting the otherwise anticipated demand for water within the SDCWA service area.

In addition, pursuant to SB 610 and SB 221, the City will require a Water Supply Assessment (WSA) report for any development meeting the criteria established by SB610. Completion of these assessments would assure that the long-term water supply will be considered throughout the buildout of downtown. While this represents a substantial increase in demand, sufficient water supply is expected to be available to meet the overall regional demand, as discussed above.

~~Specifically, t~~The Alvarado Water Treatment Plant currently supplies up to 150 mgd, and by 2008 will have a capacity of 200 mgd. With an additional demand of 10.3 mgd generated by the proposed Plan, the Alvarado Water Treatment Plant would still have a remaining supply capacity of approximately 39.7 mgd. Consequently, approval of the proposed Plans and Ordinances as well as subsequent development would not have a significant impact on water supply and would not result in the construction of a new or expanded water treatment facility. As no potential physical impacts would occur, no significant impacts would be associated with meeting the proposed water demand.

To keep up with anticipated demand, the San Diego Water Department would systematically replace or upsize deteriorating and under-sized pipes through its Capital Improvement Projects program. The exact location of improvements is unknown at this time; thus, it is impossible to identify any significant physical changes which may accompany replacement of underground water pipes. However, such improvements are categorically exempt from environmental review pursuant to CEQA.

Wastewater

Buildout of the proposed Downtown Community Plan would increase the demand for wastewater services to 13.1 mgd. This is approximately 8 mgd greater than what is estimated to be currently generated. This represents a substantial increase in demand; however, the PLWTF would be able to accommodate the increased flow. The PLWTF currently treats 180 mgd of flow and has a treatment capacity of 240 mgd, leaving 60 mgd of unused capacity. With the additional demand of 8 mgd generated by the proposed Plan, the PLWTF would still have a remaining treatment capacity of 52 mgd. Therefore, buildout under the proposed Plan would not result in a physical change and would not result in a significant environmental impact.

The MER requirement is anticipated to be met in 2025, with the SBWTP online at that time to handle the extra flow diverted from PLWTF. The proposed Community Plan may require the SBWTP to be online a few years sooner. This forecast change would be anticipated by MWWD through the frequent update of the Metro Master Plan, a regional wastewater treatment planning document. This document is updated every three years to incorporate the latest regional demographic information from SANDAG. The next full update is expected to be completed in 2008 and would incorporate the population changes forecasted by the proposed Community Plan, should it be approved. According to MWWD, regional wastewater planners would have sufficient time to plan for the opening of the SBWTP should its forecasted opening day be brought forward.

To keep up with anticipated demand, the San Diego Metropolitan Wastewater Department would replace deteriorating or under-sized pipes through its Capital Improvement Projects program. As the exact location of improvements is unknown at this time, it is impossible to identify significant physical changes which may accompany replacement of underground sewer pipes. However, such improvements are categorically exempt from environmental review pursuant to the California Environmental Quality Act.

Solid Waste

Implementation of the Downtown Community Plan would result in additions to the solid waste stream, thereby further decreasing the capacity and lifespan of the Miramar Landfill. Waste would be generated from both construction activities as well as the resulting new development.

The total amount of solid waste generated by the development anticipated by the Downtown Community Plan, excluding construction waste, can be estimated using the generation rates provided by ESD in Table 5.4-6. The anticipated amount of solid waste generated by the downtown planning area at buildout is approximately 184,000 tons per year. This amount is approximately 113,000 tons greater than what is currently disposed of annually.

TABLE 5.4-6
Estimated Annual Solid Waste Generated Downtown at
Buildout of the Downtown Community Plan

LAND USE TYPE	BUILDOUT LAND USES	SOLID WASTE GENERATION RATE	TOTAL SOLID WASTE (TONS/YEAR)
Residential (unit)	53,100	1.2 tons/year	63,720
Retail (square feet)	6,070,000	0.0028 tons/year	16,996
Hotels (square feet)	12,000,000	0.0045 tons/year	54,000
Office (square feet)	29,821,000	0.0017 tons/year	50,696
TOTAL Estimated Solid Waste Generated per Year			185,412

Source: City of San Diego, Environmental Services Department. 2004
 CCDC, Downtown Community Plan, 2005

The project would result in a net increase of solid waste to be placed in the Miramar Landfill and an alternate landfill once this landfill closes. However, pursuant to Section 15145 of CEQA, analysis of physical changes which may occur from a new landfill would be speculative and no further analysis is required.

In order to reduce the amount of waste material entering landfills and meet recycling goals established by the City and mandated by the state of California, the City of San Diego requires individual redevelopment activities of at least 50 residential units or at least 40,000 square feet of commercial space to submit a Waste Management Plan to limit construction and demolition waste. In addition, redevelopment activities meeting this threshold would be required by San Diego Municipal Code to manage long-term solid waste generated after construction. They would be required to have as many recycling bins as trash bins on the premises and provide adequate interior and exterior refuse and recycling storage space (San Diego Municipal Code §142.0801 through 142.0830). ~~Conformance to the Municipal Code would reduce long-term solid waste generation impacts to below a level of significance.~~

5.4.4 MITIGATION

Physical impacts on the environment associated with the proposed Community Plan have either been considered not significant or to be speculative pursuant to Section 15145 of the CEQA Guidelines. Consequently, no mitigation measures are identified.

5.4.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Physical impacts on the environment associated with the proposed Plans or Ordinances have either been considered not significant or to be speculative pursuant to Section 15145 of the CEQA Guidelines. Consequently, no mitigation measures are identified.

5.5 GEOLOGY AND SEISMICITY

5.5.1 EXISTING CONDITIONS

The following geologic discussion is based on information from the Geologic Hazards Study prepared by URS Corporation in October 2002, and located in Appendix 2.5 of the technical appendices.

5.5.1.1 Geologic Setting

The downtown planning area lies within a low relief coastal plain adjacent to the San Diego Bay. The historic high tide line follows the Pacific Coast Highway and the former alignment of Harbor Drive. Further inland, the coastal plain rises to the northeast to an elevation 160 feet above mean sea level (MSL) near Balboa Stadium. Due to the highly urbanized environment of the downtown area, most ground surfaces have been modified or obscured. The tidal flats adjacent to the San Diego Bay have been reclaimed by artificial fill to form the current bay margin.

Geologic Units

Mapping completed by Kennedy (1975) shows that the downtown San Diego area is underlain by the San Diego Formation on the eastern border of the downtown planning area, by the Bay Point Formation in the center of the planning area, and by artificial fill along San Diego Bay (Figure 5.5-1)

Artificial Fill

The majority of artificial fill is located along the San Diego Bay, and generally, the depth of fill is greatest near the bayfront. Known thickness of fill ranges from 0 to 20 feet, however, the average depth within the downtown planning area is approximately three feet. Artificial fill generally consists of gravel, sand, silt and clay with organic and demolition debris. The artificial fill in the planning area ranges from damp to saturated, and loose to medium density. It often contains voids and is locally potentially expansive.

Bay Point Formation

Beneath the artificial fill or at the surface where fill does not exist is the Bay Point Formation. Containing marine and non-marine sediments, this Late Pleistocene-age formation generally consists of fine- to medium-grained, thinly laminated, moderate- to well-sorted sands, with occasional clayey silts and gravels (Kennedy 1975). This formation is moist to saturated and moderately to non-expansive. Depth to the formation ranges from 0 to 10 feet and thickness is approximately 120 feet.

San Diego Formation

From the Pliocene age, the San Diego Formation lies underneath the Bay Point Formation. This is a marine formation that consists primarily of siltstone and sandstone, with lenses of conglomerate, marl and mudstone. Fossil shell lenses are also common. This formation is dense to very dense, locally cemented and generally non-expansive. Depth to the San Diego Formation varies by location from 0 to 120 feet and reaches a maximum thickness of 1,200 feet. The San Diego Formation rests on older pre-Pliocene rocks.

Groundwater

Groundwater in the downtown planning area is relatively shallow as a result of the proximity of the ocean and can be approximated based on the elevation of an area. In general, groundwater is encountered a few feet above mean sea level in the downtown area. Areas very close to the San Diego Bay may see some daily changes in groundwater level resulting from tidal variation. Groundwater levels in other areas of downtown may be locally affected by temporary dewatering systems for adjacent structures under construction or, in a few cases, permanent dewatering systems. Localized, perched water is also encountered in the downtown area at elevations above the permanent groundwater surface.

Below-grade structures located within several City blocks inland of San Diego Bay require temporary dewatering to lower the groundwater table. There are current ordinances that deter permanent dewatering. In the downtown area, the ground surface gains elevation at a steeper gradient than the groundwater table. Below-grade construction at a distance from the Bay can typically take place without the need for dewatering, depending on the depth of the proposed excavation. Below-grade structures can also be designed to withstand hydrostatic pressures of the permanent groundwater table. Therefore, it is generally feasible to construct multi-level below-grade structures anywhere within the downtown planning area.

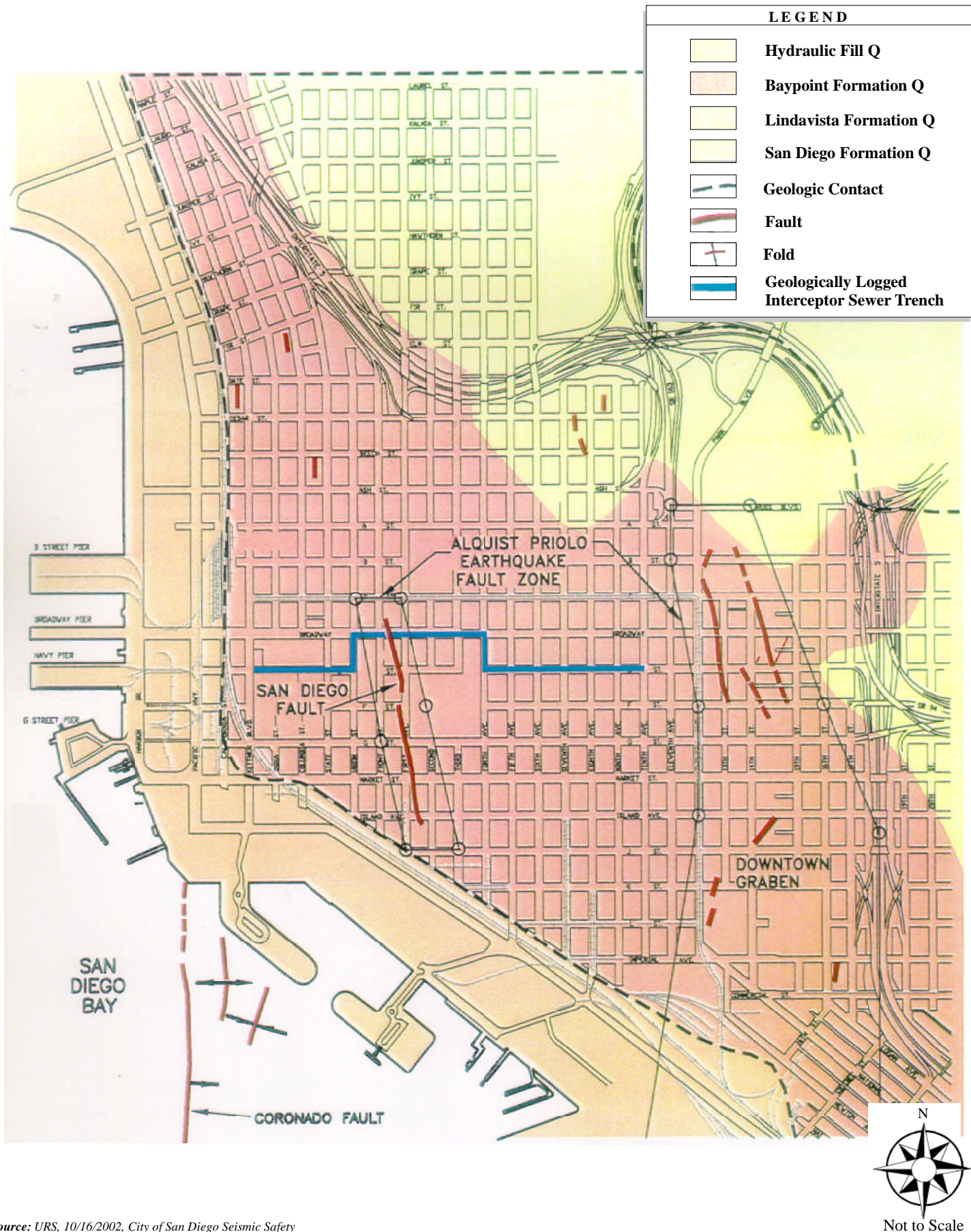
5.5.1.2 Tectonic Setting

As illustrated in Figure 5.5-1, a number of faults occur in downtown. The tectonic setting of the downtown planning area is influenced by plate boundary interaction between the Pacific and North American lithospheric plates. This interaction occurs along a broad zone of northwest-striking faults that, at the latitude of San Diego, extends from the San Clemente fault zone (60 miles offshore) to the San Andreas Fault (90 miles east of San Diego).

The most active faults occur along the eastern margin of the plate boundary and include the San Andreas, San Jacinto, and Imperial Faults. To a lesser extent, earthquakes generate from western and offshore fault zones, including the Ellsinore, Rose Canyon, Coronado Bank, and San Clemente fault zones (Figure 5.5-2).

Historical Seismicity

The historical pattern of seismic activity in coastal San Diego (since about the 1930s) has generally been characterized as a broad scattering of small magnitude earthquakes. This is in contrast with the surrounding regions of Southern California, northern Baja California, and the nearby offshore regions, which are characterized by a high rate of seismicity, where many large to moderate earthquakes have occurred during the past 50 years or so. Although the historical seismicity for San Diego during the short period of observations is low, geologic data indicates that the Rose Canyon Fault Zone represents a significant seismic hazard to the entire coastal metropolitan region of San Diego, and is clearly capable of generating large earthquakes. The San Diego Bay region is considered to lie within the Rose Canyon Fault Zone and has been the location of repeated small to moderate magnitude earthquakes. A 1985 series of earthquakes (largest event M4.7) were centered generally within about 0.6 mile south of the San Diego-Coronado Bay Bridge. A similar series of small earthquakes in 1964 were also generally located beneath the southern San Diego Bay.



Source: URS, 10/16/2002, City of San Diego Seismic Safety Study, 1995 and CDMG 1996

Geologic Formations and Faults _____ Figure 5.5-1

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LEGEND

Geologic Hazards:

- | | |
|--|--|
| <ul style="list-style-type: none"> ALL OTHER CONDITIONS:
Level mesas-underlain by terrace deposits and bedrock, nominal risk ALL OTHER CONDITIONS:
level or sloping terrain, unfavorable geologic structure low to moderate risk ALL OTHER CONDITIONS:
other level areas; gently sloping to steep terrain, favorable geologic structure low risk FAULT ZONES-
Active, Alquist-Priolo Earthquake Fault Zone | <ul style="list-style-type: none"> FAULT ZONES-
Downtown Special Fault Zone (Zone 13) LIQUEFACTION-
High Potential-shallow groundwater major drainages, hydraulic fills LIQUEFACTION-
Low Potential-fluctuating groundwater minor drainages, hydraulic fills |
|--|--|



Not to Scale

Source: URS, Downtown Community Plan, 10/16/2002

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Local Faults

Rose Canyon Fault

Based on present geologic mapping, downtown San Diego is located generally within the Rose Canyon fault zone (RCFZ), which extends along the northeast flank of Mount Soledad and continues southward along the eastern margins of Mission Bay. Between Mission Bay and San Diego Bay, the zone appears to widen and diverge. At least three principal faults extend across to Coronado and beyond to the south. The three principal faults identified in the offshore area of San Diego Bay are the Spanish Bight, Coronado, and Silver Strand Faults (Figure 5.5-2). Based on indications that several areas in the eastern downtown area show faults with Holocene (last 10,000 years) displacements, these areas are considered to be active. Both the RCFZ and the offshore faults have been zoned by the California Department of Mines and Geology as Earthquake Fault Zones (Alquist-Priolo zone).

Downtown Graben

The active faults in the eastern downtown area have been referred to as the "Downtown Graben". The graben, considered to be within the RCFZ, defines an approximately 1,000-foot-wide area, roughly bounded by C and F Streets between Twelfth Avenue and 15th Street. Based on a broad, subtle topographic swale, the faults comprising the graben probably continue south towards the Bay.

San Diego Fault

An active fault currently included in an Alquist-Priolo Earthquake Fault Zone, the San Diego Fault runs in a north-south direction near Broadway to Island Avenue, and between Front Street and Second Avenue.

Other Faults

Other faults have been located during recent investigations downtown in the Little Italy neighborhood. These faults have not shown evidence of active faulting, but are classified as potentially active since they displace Pleistocene deposits.

Potentially active faults have also been found northwest of the Downtown Graben in the vicinity of the El Cortez Hotel near Beech and Cedar Streets and Tenth and Twelfth Avenues.

Liquefaction

Liquefaction is a phenomenon where loose, saturated, and relatively cohesionless soil deposits lose strength during strong ground motions. Primary factors controlling development of liquefaction include intensity and duration of ground accelerations, characteristics of the subsurface soil, in situ stress conditions, and depth of groundwater. Sites underlain by relatively loose, saturated deposits of fill, such as found along the San Diego Bay, and areas underlain by younger Bay deposits are susceptible to liquefaction.

Lateral spreading is a lateral ground movement that takes place when liquefaction occurs adjacent to a slope or open face. The loss of strength in the liquefied material near the base of a slope can result

in a slope failure. These kinds of failures have occurred adjacent to rivers and streams and along waterfronts and beaches during seismic events.

5.5.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse, environmental impact related to Geology and Seismicity if the goals, policies, objectives or regulations established by the planning documents, and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion GEO-A Expose people or structures to substantial risk or injury or loss of life, or destruction of property caused by seismic or geologic hazards.

5.5.3 ENVIRONMENTAL IMPACTS

5.5.3.1 Seismic and Geologic Hazards (GEO-A)

Seismic activity is considered to be a hazardous geologic condition in the downtown planning area. All of downtown San Diego is located essentially within approximately one mile of the Rose Canyon Fault Zone, which is considered a significant seismic hazard to the San Diego metropolitan area. A moderate or major earthquake could occur that would threaten lives and property. Buildout of the proposed Downtown Community Plan would result in the construction of 38,500 new housing units, 16.7 million new square feet of office space, and over 11,200 hotel rooms that would be exposed to the effects of groundshaking. Therefore, there would be a proportionate increase in personal and property damage as the population within the downtown planning area increases. Ground shaking could also cause secondary geologic hazards such as slope failures and seismically-induced settlement. Since the downtown planning area is relatively flat and has no history of landslides, the potential for landsliding caused by earthquakes is considered to be low.

Potentially significant impacts to future development as a result of seismic groundshaking would be reduced to below a level of significance through implementation of goals and policies contained in the Health and Safety chapter of the Downtown Community Plan. They include:

- Goal 13.1-G-1: Maintain a safe and livable environment by mitigating and avoiding risks posed by seismic conditions.
- Goal 13.1-G-2: Create an open space network in areas where development is precluded by faults to the greatest extent possible.
- Policy 13.1-P-1: Implement all seismic-safety development requirements, including the Alquist-Priolo Zone Act, City requirements for the Downtown Special Fault Zone and areas subject to potential liquefaction, and building codes.

Policy 13.1-P-2: Coordinate with the City in enforcement of Ordinance 18451 for unreinforced masonry (URM) building reinforcement, and require appropriate reinforcement of URM buildings integrated into new development.

Policy 13.1-P-3: Where active faults are found and building cannot take place, work closely with developers to provide publicly-accessible open space.

In addition to these goals and policies, conformance to building construction standards for seismic safety within the Uniform Building Code would assure that new structures would be able to withstand anticipated seismic events within the downtown planning area.

5.5.4 MITIGATION MEASURES

No mitigation measures would be required as there are no identified significant impacts with respect to Geology and Seismicity.

5.5.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Potential impacts would not be significant.

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5.6 AESTHETICS/VISUAL QUALITY

5.6.1 EXISTING CONDITIONS

5.6.1.1 Setting

The downtown planning area is highly urbanized and is characterized by such features as a grid street network; fully developed blocks; historic buildings; mid-to high-rise commercial, public and institutional structures; multi-family residential developments; low-rise warehouses; trolley and rail lines; parking structures; and a scattering of neighborhood parks. The downtown planning area lacks natural scenic resources like the natural landforms, waterways and open space typically found in less developed areas.

Natural and constructed visual resources occur just outside of the downtown planning area boundary and can be seen from public spaces downtown. Important natural visual features include San Diego Bay and the distant views of Point Loma and the City of Coronado. The most prominent constructed visual features include the San Diego-Coronado Bay Bridge and Balboa Park. From the periphery, downtown's skyline is considered to be an important constructed visual resource.

The following discussion describes the character of the existing downtown neighborhoods and districts. For a thorough description of these neighborhoods, refer to Chapter 3.0 Environmental Setting.

Core

Visual characteristics of the Core neighborhood include:

- A cluster of high-rise office buildings located west of Eighth Avenue. A number of these buildings were built in the 1980's and reflect a modern architectural style, having rectangular, unarticulated appearances and facades with reflective glass windows, neutral tones, or painted steel;
- Older high-rise administrative and institutional buildings near Third Avenue, including the Civic Center Complex (which contains city administration offices, Golden Hall, and the Civic Theater), the Concourse Plaza on C Street, and various mid-rise to high-rise historic structures exhibiting more elaborate façades; and,
- Small-scale commercial and light industrial buildings with few architecturally-distinguishing features and surface parking lots.

Columbia

Visual characteristics of Columbia include:

- A mix of buildings containing various scales, uses, and architectural styles;
- Marine travel infrastructure such as the Broadway Pier, the Cruise Ship Terminal, and boat docks;
- Trains and trolleys moving through the western edge of Columbia on California Street;

- The historic Santa Fe Depot (the downtown hub for train and trolley) constructed in a Spanish Mission architectural style;
- Small-scale office buildings, hotels, and surface parking lots, and public art located along the waterfront; and,
- A number of tall, architecturally distinctive high-rise developments located inland from the waterfront.

Cortez Hill

Visual characteristics of Cortez Hill include:

- A number of mid-rise apartment buildings and a few remaining Victorian-era, single-family homes on the east side of the neighborhood;
- The high-rise historic El Cortez Hotel building with distinctive facades and the landmark “El Cortez” red neon sign on its roof;
- Recently-constructed high-rise mixed-use buildings;
- Views of Balboa Park, lower downtown, and San Diego Bay; and,
- A mix of buildings containing various scales, uses, and architectural styles such as courts of law, offices, affordable housing, religious institutions and charities, and the California Western School of Law, located on the west side of the neighborhood.

East Village

Visual characteristics of East Village include:

- The academic campuses of City College, San Diego High School and Garfield High School, occupying the northeast quadrant of the neighborhood;
- The Central Library and Main Post Office housed in historic buildings in addition to low- to mid-rise historic buildings in the northwest quadrant of the neighborhood.
- Large and small warehouses, adapted buildings, surface parking lots, small single-family residential homes from the early 1900’s, social service facilities, deteriorated and blighted properties, multi-family apartments, and some retail, located throughout the neighborhood, but primarily in its southeast quadrant; and,
- Petco Park, Outfield Park, and recently-constructed high-rise mixed-use, multi-family residential, and hotel developments, as well as multi-level parking garages, located in the southwest quadrant of the neighborhood.

Gaslamp Quarter

Visual characteristics of the Gaslamp Quarter include:

- A tight cluster of low- and mid-rise historic buildings from the late 1800’s, containing uses such as nightclubs, restaurants, sidewalk cafes, movie theaters, retail, hotels, offices, galleries, and live/work lofts;

- Turn-of-the-century gaslamp-style light fixtures along the sidewalks; and,
- Recently-constructed mid-rise buildings at the southern end of the neighborhood.

Horton Plaza

Visual characteristics of Horton Plaza include:

- The Horton Plaza outdoor shopping mall built in the 1980's, containing three shopping levels and an inward orientation;
- Street-level retail and restaurants;
- Historic buildings containing theaters and restaurants; and,
- The Federal Building and the courthouse.

Little Italy

Visual characteristics of Little Italy include:

- The historic County Administration Center and lawns, and large-scale, boxy industrial centers located close to the waterfront;
- A small number of new high-rise buildings located in the southern part of the neighborhood;
- The revitalized India Street, lined with a number of retail shops, restaurants, galleries, and artists studios, noted for its large "Little Italy" sign spanning the street;
- Recently-constructed low- to mid-rise residential and mixed-use projects; and,
- Public art along India Street and around Amici Park.

Marina

Visual characteristics of Marina include:

- Seaport Village, a collection of tourist-oriented and marine-themed shops and restaurants, boat docks, walkways, and parks;
- A number of up-scale high-rise and mid-rise residential developments;
- Pantoja Park; and,
- The nautically-inspired architectural designs of the Convention Center and high-rise hotels along the South Embarcadero.

5.6.1.2 Key View Locations and Characteristics

Key Vantage Points

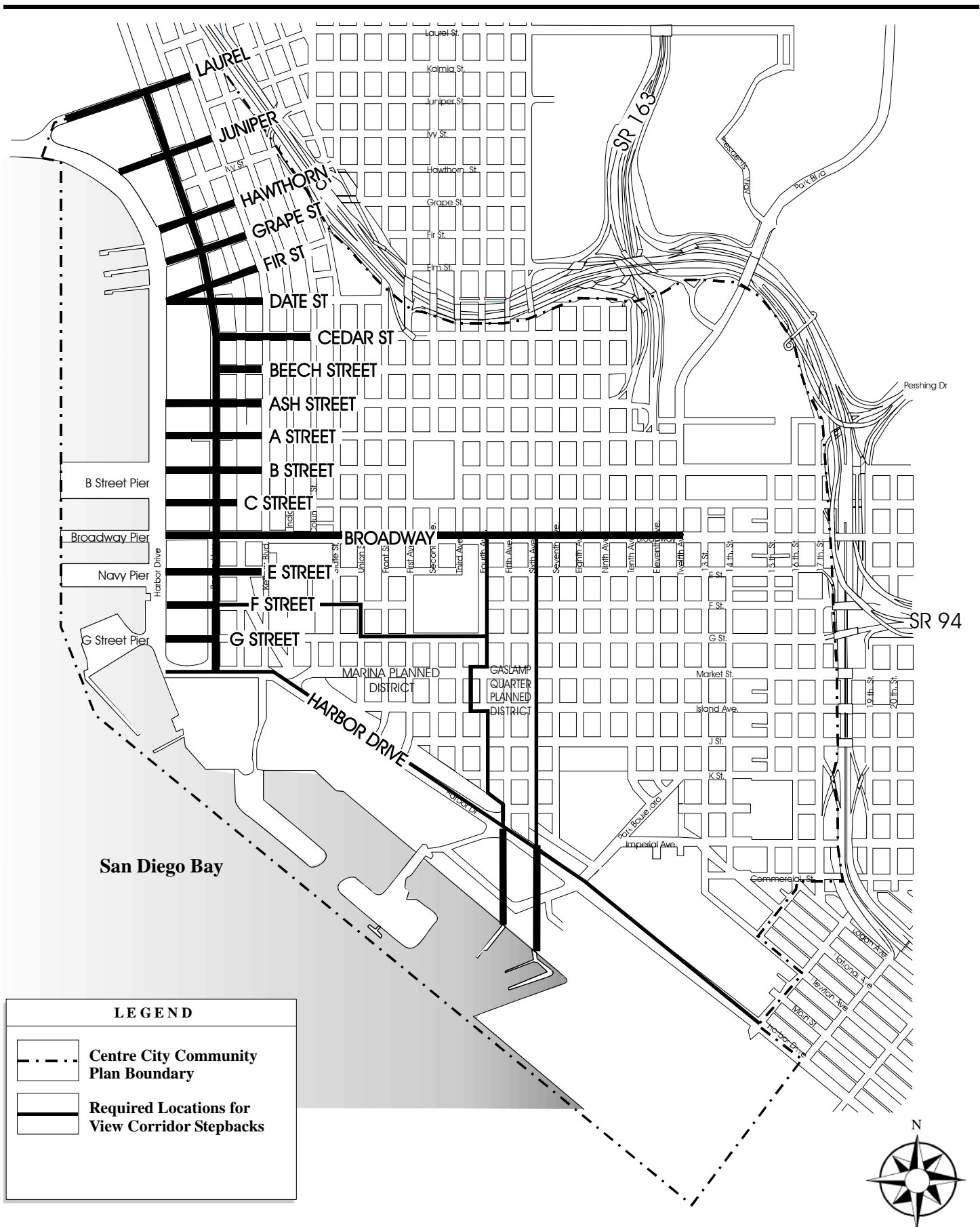
For the purpose of analysis, the following six key public areas within and around the downtown planning area were selected:

- **Waterfront – North Embarcadero.** Views from this vantage point include San Diego Bay and Point Loma.
- **Waterfront – South Embarcadero.** Views from this vantage point include San Diego Bay, the City of Coronado, and the San Diego-Coronado Bay Bridge.
- **Balboa Park.** Views from this vantage point include the Downtown San Diego skyline, San Diego Bay, and San Diego-Coronado Bay Bridge.
- **Interstate-5.** Views from this vantage point include the Downtown San Diego skyline and San Diego Bay.
- **Highway 94.** Views from this vantage point look over East Village to the San Diego Bay.
- **San Diego-Coronado Bay Bridge.** Views from this vantage point include San Diego Bay and the Downtown San Diego skyline.

All of these viewpoints are accessible by the public and afford long-range views of one or many scenic resources such as the San Diego Bay, San Diego-Coronado Bay Bridge, Point Loma, Coronado, and the downtown skyline. Public parks within the downtown planning area, inland from the waterfront, such as Pantoja Park, Amici Park, Outfield Park, and Martin Luther King Jr. Promenade were considered for analysis but excluded as they offer little opportunity for taking in long-range views of scenic resources.

View corridors

While development downtown has interfered with views of San Diego Bay, Horton Plaza and Ballpark, (e.g. the Convention Center and County Administration Building), many of the views to the San Diego Bay and other important visual features have been preserved along a number of downtown streets, which are also considered public vantage points. In particular, views of San Diego Bay and Point Loma can be seen from Hawthorne Street, Grape Street, Ash Street, and Broadway. Views of San Diego Bay occur west of Union, B, C, and E streets. North-South trending streets including Sixth Avenue and Park Boulevard also offer views of San Diego Bay. View corridors designated by the existing Centre City Community Plan are shown on Figure 5.6-1.



Source: Centre City Community Plan, 2005

Approximate Scale
1 inch = 1400 feet

Existing Designated View Corridors Figure 5.6-1

5.6.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to visual quality if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion VIS-A	Result in bulk, scale, materials, or style that would be incompatible with surrounding development;
Significance Criterion VIS-B	Substantially disturb a vista or scenic view from a public viewing area;
Significance Criterion VIS-C	Substantially degrade a scenic resource; or
Significance Criterion VIS-D	Cause substantial light or glare that would adversely affect daytime or nighttime view in the area.

5.6.3 ENVIRONMENTAL IMPACTS

5.6.3.1 Neighborhood Character (VIS-A)

Although major new development would be anticipated to occur in accordance with the proposed Plans, it is anticipated that the proposed Downtown Community Plan would not adversely affect neighborhood character through the development of land uses with incompatible bulk, scale, materials, or style. In fact, the proposed Community Plan would likely enhance neighborhood-character through goals and policies that focus on historic preservation, landscaping, streetscaping, bulk and scale limitations, and urban design guidelines. Fine-grain development overlays are established by the proposed Plan over neighborhood mixed use centers and two large areas in Little Italy and East Village. These fine-grain criteria would help retain the neighborhood character by assuring a diversity of architectural styles and encouraging small block development. Fine grain overlays would also established ~~by Section 103.1905(b)(6) of~~ the proposed PDO.

With respect to landscaping and streetscaping, the proposed Community Plan would not result in significant adverse neighborhood character impacts. Goal 5.4-G-1 of the proposed Downtown Community Plan would “enhance downtown through distinctive streetscapes and promote street trees and unified landscape treatments along streets, while ensuring sunlight.” Goal 5.4-G-2 envisions streets as “extensions of downtown’s open space network, presenting opportunities to linger, stroll, and gather, rather than simply as traffic movement spines.” Therefore, landscaping and streetscaping goals of the proposed Community Plan would serve to improve the visual quality of downtown’s neighborhoods.

The development of buildings containing incompatible bulk and scale would be minimized as a result of the proposed Plans. The proposed Planned District Ordinance would regulate bulk and floor area ratios, maximum building heights, minimum and maximum floor plate areas, high-rise

tower articulation, and sun access for the downtown planning area. ~~Section 103.1908(1) and (2) of~~ ~~€~~The proposed PDO would establish sun access criteria for development.

The proposed Planned District Ordinance would also include mandatory urban design standards for future downtown development. Therefore, the visual quality of downtown's architecture would be well-regulated and improved as a result of the proposed standards.

Neighborhood mixed-use centers proposed by the Downtown Community Plan would be designed to be visually compatible with surrounding development. Policy 5.2-P-2 would ensure that centers are "attractive destinations [that] offer pedestrian comfort, and maximize sun access to street and sidewalks through a variety of implementing mechanisms including: streetscape improvements (such as consistent street trees, widened sidewalks, seating, and lighting), maximum on-street parking, and sun access standards." In addition, the proposed Downtown Community Plan would ensure that retail uses in the mixed-use centers would blend with the surrounding neighborhood. Policy 3.1-P-4 would allow retail establishments of any size in the Main Streets and Centers, provided they are "integrated with the centers, maintain a pedestrian orientation and active street frontage, and do not require block consolidation." Therefore, the neighborhood mixed-use centers would not negatively affect neighborhood character. In fact, they would reinforce the character of evolving neighborhoods.

In addition, new parks would be designed to become visual assets of downtown's neighborhoods. Goal 4.1-G-4 would make "new public parks and plazas harmonious, inspirational, and sources of community pride and character through design excellence." New parks would also have an indirect benefit by providing space underground for parking, thereby reducing the demand for potentially visually unappealing parking structures or surface parking lots. Policy 4.1-P-4 would allow parking under all new parks and open spaces greater than half-block in size, or less than half-block in size where feasible. Therefore, new parks would improve the visual quality of downtown's neighborhoods.

The following discussion evaluates the potential impacts to neighborhood character the Community Plan would have on each of the proposed downtown neighborhoods.

Civic/Core

There would be no significant neighborhood character impacts in Civic/Core resulting from the implementation of the proposed Community Plan. Goal 5.3-G-1 of the proposed Downtown Community Plan would permit bulkier buildings in the Core while striving for slender towers in the neighborhoods that permit greater sky exposure for adjacent sidewalks. Although bulkier buildings would be permitted in Civic/Core, neighborhood character would not be adversely affected. As downtown's business district, there is an existing high density of high-rise and large-scale buildings. Therefore, further development of such structures would not be out of context in this neighborhood.

Columbia

No significant impacts to neighborhood character would occur in Columbia from implementation of the proposed Community Plan. The proposed Downtown Community Plan would continue the current redevelopment trend of building high-rise residential, office, and hotel towers in Columbia

by designating the majority of the neighborhood as Core. This designation allows for a high intensity of uses with fewer restrictions on building bulk and tower separation than in other districts. Like in the Civic/Core neighborhood, bulkier buildings would not adversely affect neighborhood character as there is an existing high density of high-rise and large-scale buildings. Additionally, Urban Design Standards contained in the Planned District Ordinance would ensure compatible building scales and styles. Therefore, further development of high-rise structures would not be out of context in this neighborhood.

Columbia's waterfront offers views of the San Diego Bay and Point Loma which could be affected by the proposed Community Plan. The effect of the proposed Community Plan on public views and view corridors is discussed below in Chapter 5.6.3.2.

Convention Center

There would be no significant neighborhood character impact to the Convention Center district as a result of implementation of the proposed Community Plan. As the Convention Center neighborhood is largely established by such facilities as the Convention Center, Tenth Avenue Marine Terminal, and railroad switching yards, only a small area would be affected by the Downtown Community Plan. This area is located near the proposed East Village SE sub-district and would be designated as Mixed Commercial (previously called "Flexible Use") by the proposed Downtown Community Plan. The Mixed Commercial "flexible-use" designation allows for residential, artists' studios, live/work spaces, small-scale offices, and research and development. Light industrial, warehousing and distribution, and transportation services would also be allowed here. Small-scale warehouses and rail support services already occupy this area. Therefore, the proposed designation would not substantially alter the character of the neighborhood.

Cortez

There would be no significant impacts to neighborhood character in Cortez as a result of the proposed Community Plan. The designations proposed for Cortez would allow for development of residential, mixed-use, and office uses. Urban Design Standards contained in the Planned District Ordinance would ensure that these uses are developed to be visually compatible with surrounding areas. Additionally, the freeway lids proposed by the Downtown Community Plan for the northern boundary of Cortez would provide a visual amenity to the neighborhood. As many as five lids would cap the visually unappealing I-5 freeway and create new landscaped areas.

East Village: Ballpark Sub-district

There would be no significant neighborhood character impacts associated with future development in the Ballpark sub-district as a result of implementation of the proposed Community Plan. The Ballpark Protection Overlay, established as a result of the Ballpark SEIR and incorporated into the proposed Downtown Community Plan, would protect surrounding development from visually incompatible land uses by minimizing light, glare, and shadow impacts, and by defining design criteria for signs. Additionally, Urban Design Standards contained in the Planned District Ordinance would ensure compatible building scales and styles.

East Village: Northeast Sub-district

There would be no significant impacts to neighborhood character in Northeast Sub-district as a result of implementation of the proposed Community Plan. The proposed Downtown Community Plan would allow for the development of satellite educational facilities as well as larger floor plate buildings containing medical or office uses. These buildings would not be out of character with surrounding areas as Goal 8.1-G-4 of the Downtown Community Plan would integrate new school buildings and improvements with downtown's urban environment. In addition, Goal 8.1-P-6 instructs that in design and programming of new educational facilities, connections with surrounding uses, relationships to neighboring structures and streets, efficient use of land, and multi-story urban models would be emphasized. This goal encourages the integration of new educational facilities with established neighborhood uses, which vary from residential to mixed-use to office. Therefore, there would be no adverse impact to neighborhood character.

East Village: Northwest Sub-district

No significant impacts to neighborhood character would result in the Northwest sub-district as a result of implementation of the proposed Community Plan. The proposed Downtown Community Plan would continue the current redevelopment trend of building residential towers and mixed-use buildings by designating most of the sub-district as Residential Emphasis and the rest as Neighborhood Mixed-Use and Employment/Residential Mixed Use. It is anticipated that neighborhood character would improve as new development continues to replace older buildings affected by blighted conditions. Urban Design Standards contained in the Planned District Ordinance would ensure that these uses are developed to be visually compatible with the neighborhood. Therefore, neighborhood character would not be adversely affected.

East Village: Southeast Sub-district

There would be no significant neighborhood character impacts in the Southeast sub-district resulting from the proposed Community Plan. The proposed Downtown Community Plan would designate most of the sub-district as Residential Emphasis and the rest of the sub-district as Neighborhood Mixed-Use and Flexible Use. It is anticipated that visual quality would improve in here as new development replaces older, deteriorating buildings affected by blighted conditions. In addition, freeway lids proposed for the sub-district's eastern boundary would provide a visual amenity to the neighborhood. Up to three lids would cover portions of the I-5 freeway and create additional landscaped park space.

The proposed Downtown Community Plan would allow for the development of large facilities in Southeast Sub-district that could significantly impact the fine-grained character of the neighborhood. However, goals and policies contained in the Downtown Community Plan would preclude such impacts from occurring. Goal 3.5-G-1 would allow large facilities in this and Convention Center areas, provided that the facilities do not interrupt community fabric, street grid, designated public views, or the viability of Neighborhood Centers, and that facilities are designed to be compatible in scale and texture with the surrounding uses. Providing specific measures to achieve this goal, Policy 3.5-P-1 would only approve a large facility when the following objectives are met:

- All large floor plate space and parking is located completely below grade to retain street grid and neighborhood design and feel;
- The street grid is maintained, and any previously interrupted streets on the project site are reinstated;
- Above-ground buildings are seamlessly integrated in scale, size, and character with the neighborhood;
- Uses are consistent with the applicable land use category; all applicable development and design policies, regulations, and standards (including bulk and volume standards) are met; a portion of above-ground buildings are devoted to another civic or community-oriented facility, such as a school, college, hospital, or fire station; designated public views are maintained; and,
- The project is oriented as a complement to any nearby Neighborhood Center, and retain, restaurants, and pubs developed as part of or in tandem with the project are limited or the side or corner of facility facing the Center.

Finally, Policy 3.5-P-2 would require all large facilities to undergo a discretionary design review process. Therefore, there would be no significant impact to neighborhood character as a result of the development of large facilities in Southeast Sub-district.

Gaslamp Quarter/Horton Plaza

No significant neighborhood character impacts would occur in Gaslamp Quarter/Horton Plaza as a result of implementation of the proposed Community Plan. It is anticipated that this neighborhood would experience the fewest changes of all of the proposed neighborhoods, as it is nearly built-out. The architectural quality of historic Gaslamp Quarter buildings is protected by the National Register of Historic Places. Therefore, this policy would minimize impacts to the Gaslamp's historic character.

Little Italy

There would be no significant impacts to neighborhood character in Little Italy as a result of implementation of the proposed Community Plan. Proposed land use designations for Little Italy would mirror existing uses. India Street would continue to act as the neighborhood center. There would also continue to be residential, mixed-use, office, artists' studios and industrial uses surrounding the neighborhood center. Therefore, although intensification would occur as buildout occur, the character of Little Italy would not change substantially. In addition, Urban Design Standards in the Planned District Ordinance would ensure that future uses are designed to be visually-compatible with the neighborhood.

Marina

There would be no significant impact to neighborhood character in Marina as a result of the proposed Community Plan. The Marina neighborhood is the most complete residential neighborhood of all of downtown's neighborhoods. It is anticipated that it would not change substantially as a result of the proposed Community Plan. However, the Navy Broadway Complex along Marina's waterfront could experience some redevelopment. The policies and goals contained

in the proposed Downtown Community Plan would ensure that individual redevelopment developments in this area would remain small in scale and protect views of the Bay. For instance, Policy 5.5-P-3 would ensure that development along the shoreline is low in scale and intensity, increasing in stepped building envelopes further inland. Policy 5.5-P-5 would prohibit large structures, such as sports arenas from developing along the waterfront. Finally, Policy 5.5-P-6 would require a high degree of architectural detail and quality to emphasize the importance of the waterfront. Therefore, in addition to Urban Design Standards in the Planned District Ordinance, these waterfront policies would enhance the quality of redevelopment along Marina's waterfront.

Marina's waterfront offers views of the San Diego Bay, the City of Coronado, and the San Diego-Coronado Bay Bridge. The proposed Community Plan would have a beneficial effect on public views of the waterfront in the Marina neighborhood by extending E, F, and G streets, which currently truncate at Pacific Highway, through to Harbor Drive. The effect of the proposed Community Plan on public views and view corridors is further discussed in Chapter 5.6.3.2.

5.6.3.2 Public Views and View Corridors (VIS-B)

Key Vantage Points

The following discussion evaluates how the proposed Community Plan would affect scenic views from public vantage points (as described in Chapter 5.6.1.2).

Waterfront – North Embarcadero. Although redevelopment activity would occur along the waterfront at the North Embarcadero, the public view space occurs at the western border of the redevelopment area, adjacent to the San Diego Bay, where there would be no available land for development. Therefore, views of San Diego Bay and Point Loma would not be affected.

Waterfront – South Embarcadero. Like the North Embarcadero, public view space along the South Embarcadero occurs at the southern border of the redevelopment area, adjacent to San Diego Bay, where there could be no development to obstruct public views. Therefore, views of the San Diego Bay, the City of Coronado, and the San Diego-Coronado Bay Bridge would not be affected.

<p>Impact VIS-B.1 San Diego Bay and Coronado Bay Bridge View Interruption</p>
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Balboa Park. Buildout of the East Village sub-districts would have a significant impact on views of San Diego Bay and the San Diego-Coronado Bay Bridge. The proposed Plan would promote slender upper towers on future high-rise buildings in order to allow intervening views of the Bay and the bridge. Goal 5.3-G-2 would encourage building design that would result in maintaining views of the Bay. However, views of the San Diego Bay and San Diego-Coronado Bay Bridge are largely uninterrupted at the present time from Balboa Park because the intervening East Village is currently predominated by low-rise buildings. Thus, any new high-rise development in the area would result in increased view blockage and the impact would be significant.

There would be no significant impact to the skyline views from Balboa Park, as the proposed Downtown Community Plan would ensure that it remains visually appealing. Goal 5.3-G-3 would create a "variegated skyline with peaks in the Core and high-intensity East Village residential area, stepping down to the waterfront and surrounding neighborhoods."

Interstate 5. From I-5, the view of the downtown planning area is taken from a distance and at a higher elevation, affording wide and long-range views of San Diego Bay. Currently, high-rise buildings comprising the skyline do not enter into the view of San Diego Bay. Therefore, though high building elements would be added to the skyline as a result of the Downtown Community Plan, views of San Diego Bay from I-5 would not be impeded. In addition, the San Diego skyline would retain its visual quality through Goal 5.3-G-3 of the proposed Downtown Community Plan.

Impact VIS-B.1
San Diego Bay and
Coronado Bay Bridge
View Interruption

Highway 94. Buildout of the East Village sub-districts would have a significant impact on views of San Diego Bay and the San Diego-Coronado Bay Bridge. The proposed Plan would strive to limit view impacts by promoting slender upper towers on future high-rise and encouraging building design that would maintain views of the Bay. However, views of the San Diego Bay and San Diego-Coronado Bay Bridge are largely uninterrupted at the present time from Highway 94 because the highway is at a higher elevation and the intervening East Village is currently predominated by low-rise buildings. Thus, any new high-rise development in the area would result in increased view blockage and the impact would be significant.

There would be no significant impact to views of the skyline from Highway 94 as the proposed Downtown Community Plan would ensure that it remains visually appealing. Goal 5.3-G-3 would create a variegated skyline with peaks in the Core and high-intensity East Village residential area, stepping down to the waterfront and surrounding neighborhoods.

San Diego-Coronado Bay Bridge. Views from this vantage point include San Diego Bay and the Downtown San Diego skyline. As stated earlier, Goal 5.3-G-3 would ensure that the San Diego skyline retains its visual quality. Looking out from the Bridge, there would be no development to impede views of San Diego Bay.

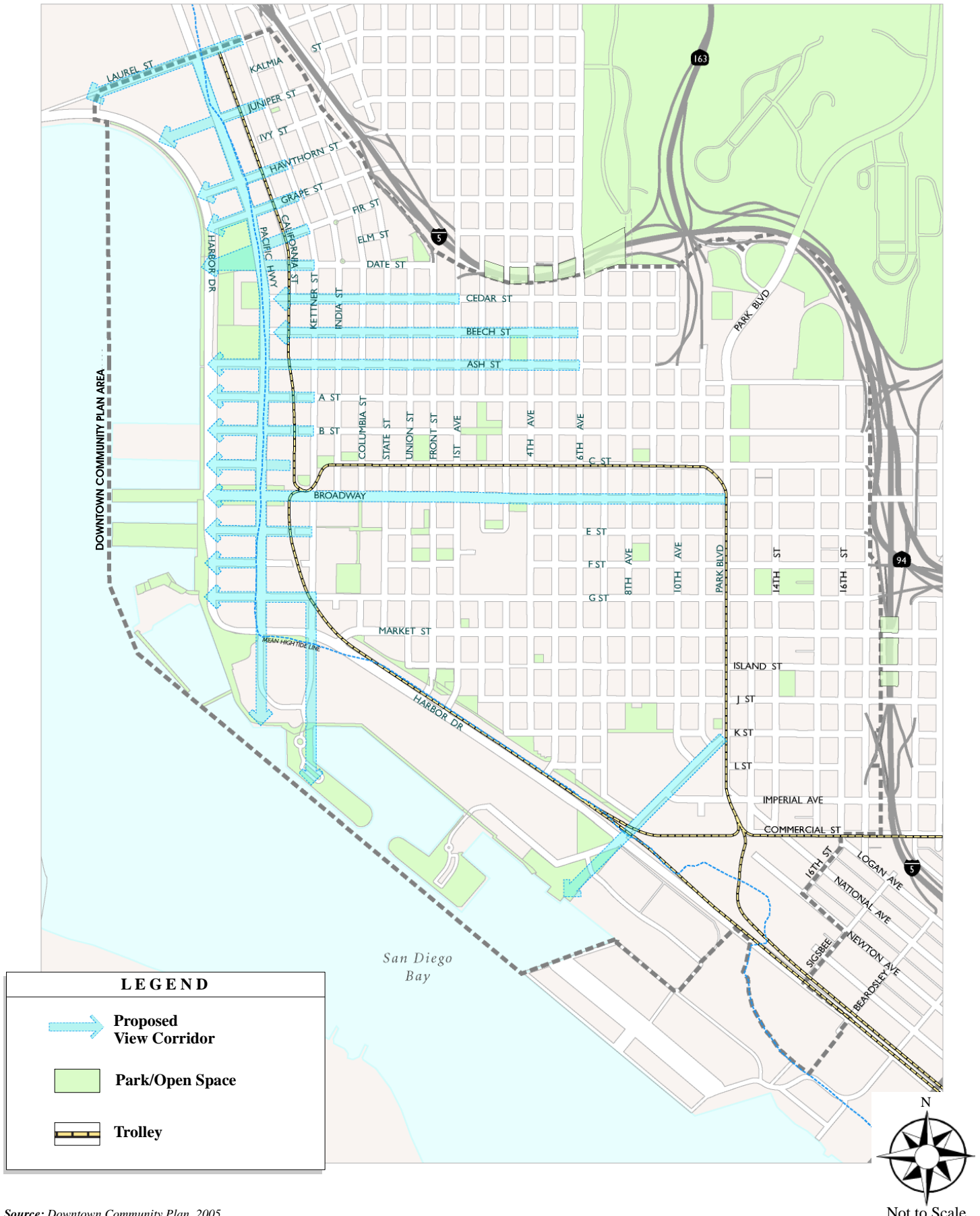
View Corridors

There would be no significant impact to views of San Diego Bay along Hawthorne, Grape, Ash, Union, B, C, or E streets, or Broadway. There would also be no significant impact to views of San Diego Bay along the north-south trending Sixth Avenue and Park Boulevard. The proposed Downtown Community Plan includes goals and policies to protect these view corridors from encroachment by surrounding development. Downtown Community Plan goals and policies are provided below and the proposed view corridors are illustrated in Figure 5.6-2.

Goal 5.1-G-~~32~~: Protect public views of the San Diego Bay by establishing view corridors with appropriate development standards, and capture new public views where possible as waterfront sites are developed.

Goal 5.3-G-2: Ensure that building height, massing, and tower spacing allows for greater visual penetration closer to the water.

Policy 5.5-P-3: Preserve and create views by:



Source: Downtown Community Plan, 2005

Proposed Designated View Corridors _____ Figure 5.6-2

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- Requiring all buildings to comply with view corridor stepbacks along existing streets and future view corridors to maintain visual and physical access to the Bay.
- Requiring buildings taller than 120 feet in the Waterfront/Marina District to be oriented so as to present the smaller face along the view corridors toward the water.

Policy 6.10-P-9: Protect views available along Hawthorn, Grape, Fir, Date, and Beech streets from obstructions potentially caused by street trees and development projects.

~~Policy 6.11 P-1: Encourage the Port to ensure that views to the Bay along Park Boulevard are maintained, and not obscured by buildings or vegetation.~~

Policy 5.1-P-5: Prohibit the construction of “sky-walks” or any visible structure in view corridors. Discourage “sky-walks” above all streets. If they occur, make them minimal in size and encourage open-air construction or transparency.

Policy 5.1-P-6: Ensure that streetscape design in the designated corridors is sensitive to views.

Policy 5.1-P-7: Work with the Port to maintain open view corridors to the water – that is, free of structures and landscaping that would restrict the views. Encourage the Port to create a view corridor extending southward along Pacific Highway and Kettner Boulevard at such time that redevelopment of the Seaport Village site is undertaken.

In addition, the Downtown Community Plan encourages new view corridors to be opened, primarily through the connection of A, B, C, E, F and G Streets between Harbor Drive and Pacific Highway.

Policy 5.1-P-3: Protect public views of the water, and re-establish water views in the corridors shown in Figure 5-1 of the Downtown Community Plan, with the following two-tiered system:

- Within the system established in *Chapter 7: Transportation* of the Downtown Community Plan, including streets and new street segments to be created when future development proceeds (such as G Street); and,
- In instances where the view corridors have been designated on Figure 5-1 of the Downtown Community Plan but a street will not be built, view/public access easements or dedications shall be required where the ground-level right-of-way width will be the same average dimension as the existing street right-of-way for street segments comprising the view corridor, including Date, Beech, A, B, C, and E streets.

Policy 7.1-P-3: Forge new connections and view corridors as larger sites are redeveloped, opening rights-of-way at the waterfront, through the Civic Center among others, and along Cedar Street. Require full vehicle and pedestrian access in new connections except where precluded by existing plans and projects.

The proposed PDO includes several requirements that would reduce visual impacts of future development. ~~The proposed PDO Table 1908-B~~ establishes view corridor stepbacks on specific streets to maintain views. Building bulk controls would be established by ~~the proposed PDO Section 103.1908(d)~~ including minimum tower spacing, street wall design and maximum lot coverage.

5.6.3.3 Scenic Resources (VIS-C)

There are no designated scenic resources within the downtown planning area. Therefore, the proposed Community Plan would not significantly impact scenic resources. The affect the proposed Community Plan would have on scenic resources that can be viewed from the downtown planning area and vicinity is discussed in Chapter 5.6.3.2 Key Vantage Points.

5.6.3.4 Light and Glare (VIS-D)

Light and glare produced from the illuminated signs and the reflective nature of some building materials at night can detract from neighborhood character by dominating the appearance of an area and also cause a hazard to motorists. The proposed Downtown Community Plan and the Planned District Ordinance anticipate these adverse effects and include policies and regulations to minimize them. With respect to light from signs, Policy 5.7-P-2 of the Downtown Community Plan would maintain “appropriate regulations to ensure that signs are allowed as a means of identification, while preventing signs from dominating the appearance of downtown and its streets, avoiding nuisances to nearby properties and protecting neighborhoods.” Policy 5.8-P-3 would “explore the feasibility of building reflectivity standards to maximize ambient light in streets and other public spaces, without glare.” ~~Section 103.1910(b) of the~~ The proposed PDO would require a light, glare and shadow study for any building over 75 feet in height.

Furthermore, lighting associated with downtown development is controlled by the City of San Diego’s Light Pollution Law (Sections 101.1300 through 101.1309 of the Municipal Code), which is intended to protect surrounding land uses, including sensitive land uses such as residential uses, as well as astronomical activities at the Palomar and Mt. Laguna observatories from excessive light generated by new development. The Light Pollution Law requires that outdoor light fixtures associated with new commercial, industrial or multi-family development comply with the following:

- Where color rendition is required for commercial and industrial purposes, such as in sales, assembly and repair areas, the outdoor lighting fixtures shall be shielded, be equipped with automatic timing devices and utilize only the minimum amount of light necessary;
- Where used for security purposes or to illuminate walkways, roadways, equipment yards and parking lots, only shielded low-pressure sodium outdoor light fixtures shall be utilized;
- Where used for on or off premises signs or for decorative effects or recreation facilities, such as for building, landscape or ballfield illumination, the outdoor light fixtures shall be equipped with automatic timing devices and where feasible, be shielded and/or focused (aimed) to minimize light pollution;
- All outdoor light fixtures, existing or hereafter installed and maintained on private property within commercial, industrial and multi-family zones, shall be turned off between 11:00 p.m. and sunrise except when used for:

- commercial and industrial uses, such as in sales, assembly and repair areas, where such use continues after 11:00 p.m. but only for so long as such use continues;
- security purposes or to illuminate walkways, roadways, equipment yards and parking lots; and
- recreation use that continues after 11:00 p.m. but only for so long as such use continues; and
- All illuminated on premises signs and searchlighting for advertising purposes shall be turned off between 11:00 p.m. and sunrise, except that on premises signs may be illuminated while the business facility on the premises is open to the public. All illuminated off premises signs shall be turned off between 12:00 midnight and sunrise.

It should be noted that the City of San Diego has exempted the downtown planning area from the restriction on the use of high pressure sodium street lighting.

Downtown Community Plan goals and policies as well as the City's Light Pollution Law would ensure that there would be no significant impact to motorists and neighborhood character as a result of nighttime light and glare.

5.6.4 MITIGATION MEASURES

Impact VIS-B.1 San Diego Bay and Coronado Bay Bridge View Interruption.

No mitigation is feasible.

5.6.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impact VIS-B.1 San Diego Bay and Coronado Bay Bridge View Interruption

Level of Significance After Mitigation: Significant

Buildout of the East Village sub-districts in accordance with the proposed Community Plan would result in taller buildings, which would substantially block views of the San Diego Bay and the San Diego-Coronado Bay Bridge currently seen from Balboa Park and Highway 94. Although design measures required by the proposed Community Plan and Planned District Ordinance would assure that the future buildings would not be unattractive, the only way to avoid the potential view blockage would be to greatly restrict high-rise development in the intervening areas. Such an action would require a major modification of the land use program of the proposed Community Plan and would conflict with the overall goal of reinforcing downtown as an urban node.

Thus, the impact of the proposed Community Plan and Planned District Ordinance on public views would be significant and not mitigated.

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5.7 NOISE

The following discussion is based on information from the Noise Impact Analysis prepared by Giroux & Associates on July 19, 2005, located in Appendix 2.6 of the technical appendices.

5.7.1 EXISTING CONDITIONS

5.7.1.1 Background

Definition

Noise is often defined as unwanted sound. Sound is energy mechanically transmitted by pressure waves in a compressible medium such as air and is described in terms of the loudness (amplitude) of the sound and frequency (pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB).

Rating Scales

A specific rating scale, the A-weighted decibel (dBA), was devised to relate sound to the sensitivity of the human hearing system. This scale is calibrated to the faintest sound audible and has approximately the same frequency response as the human hearing system.

Several rating scales have been developed for measurement of community noise. These scales account for the variety of noises found in the environment and the variations in noise levels that occur as a person moves through the environment. Two common noise scales are discussed below.

- **Leq (Equivalent Sound Level)** is the average sound level in an area over a period of time. Leq can be measured for any time period, but is typically measured for one hour. This one-hour noise level can also be referred to as the Hourly Noise Level.
- **CNEL (Community Noise Equivalent Level)** is the predominant rating scale in use in California for land use compatibility assessment, particularly for aircraft. The CNEL incorporates both the dBA scale and factors of annoyance. CNEL combines the average sound level of each noise event over a 24-hour period, the number of events during that period, and an “annoyance” factor for three separate time periods. The “annoyance” factor is used to portray the increasingly disruptive quality that noise has on people during evening and nighttime hours.

Effects of Noise

For most people, the usual consequences of noise are associated with speech interference, distractions at home and at work, disturbance with rest and sleep, and the disruption of recreational pursuits. The long-term effects of excessive noise exposure are physical as well as psychological. Physical effects may include headaches, nausea, irritability, constriction of blood vessels, changes in the heart and respiratory rate, and increased muscle tension. Prolonged exposure to high noise levels may result in hearing damage. Psychological effects may result from the stress and irritability associated with a change in sleeping patterns due to excessive noise.

5.7.1.2 Noise Regulations and Policies

Standards for noise/land use compatibility have been developed for various classes of land uses to ensure that noise exposure is considered in development decisions. Noise standards for land use compatibility are set forth in the City of San Diego Progress Guide and General Plan. These guidelines are based primarily on noise/land use recommendations from the State Department of Health and Noise Control Office and are based on CNEL.

Land uses that are particularly sensitive to noise include residential, hospitals, libraries, churches, parks and schools (hereafter referred to as “sensitive uses”). As shown in Figure 5.7-1, residential uses are normally considered compatible with noise levels up to 65 dB(A) CNEL. Least-sensitive commercial, office, manufacturing and some recreational uses are considered compatible with exterior noise levels up to 75 dB(A) CNEL. There are no land uses which are compatible with noise exposures that exceed of 75 dB(A) CNEL.

An interior CNEL of 45 dB(A) CNEL is mandated by the State of California Noise Insulation Standards (CCR, Title 24, Part 6, Section T25-28) for multiple family dwellings and hotel and motel rooms. In 1988, the State Building Standards Commission expanded that standard to include all habitable rooms in residential use, including single-family dwelling units. With standard construction practice and closed windows, exterior-to-interior attenuation of 20 dB(A) can generally be achieved. Thus, interior noise levels of 45 dB(A) CNEL can normally be met in areas of ambient noise of up to 65 dB(A) CNEL as long as they have the option of closing their windows. Noise sensitive uses can attain a 45 dB(A) CNEL in areas which exceed 65 dB(A) CNEL with additional attenuation including increased insulation and dual-pane windows.

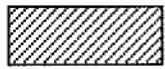
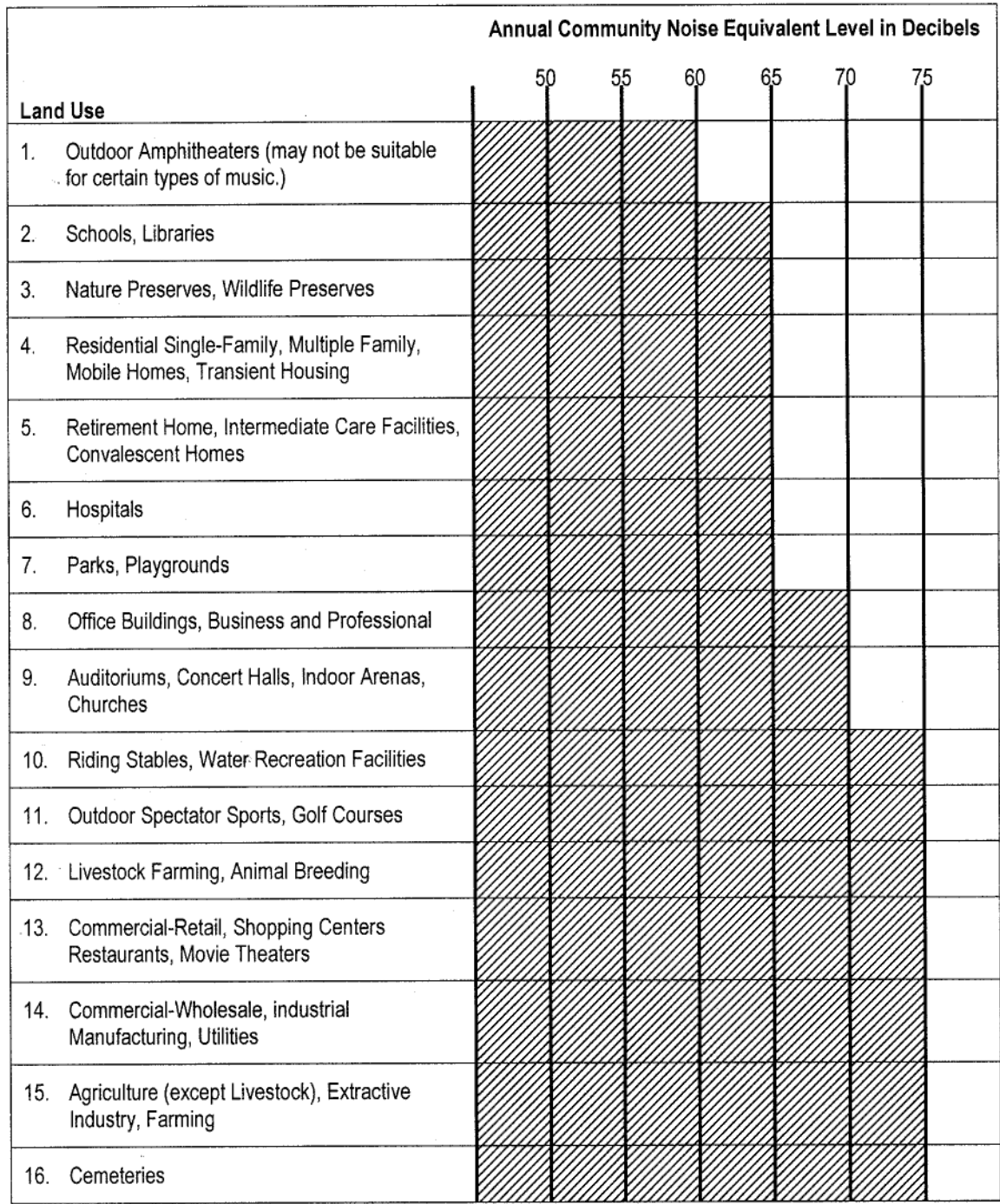
Title 21 of the California Code of Regulations establishes interior noise levels requirements for habitable rooms within the 65 dB(A) CNEL contour of a public airport. Title 21 applies to single- as well as multi-family development. Noise levels in habitable rooms are limited to 45 dB(A) CNEL or less by Title 21.

5.7.1.3 Ambient Noise Levels

The downtown planning area is subject to various noise sources including traffic (e.g., freeway and street grid traffic), aircraft from San Diego International Airport and NAS North Island, railroad activity, and to a lesser extent commercial and industrial activities. To better define current baseline noise characteristics in the downtown planning area, a noise monitoring study was conducted. Seven noise-sensitive sites were selected, most of which were located close to I-5. The locations of the monitored sites and their current ambient noise levels are included in Table 5.7-1.

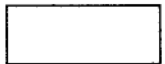
Traffic Noise

Traffic from the I-5 freeway and the downtown street grid represents the most significant source of noise in the downtown planning area. Overall, the estimated 65 dB(A) CNEL contour for freeway traffic is approximately 400 feet from I-5 freeway centerline assuming partial shielding from closer-in development is present. Each of the monitored sites had background noise typical of the steady “hum” from traffic along I-5. Six of the seven monitored sites near residences have estimated noise levels that exceed the City of San Diego exterior noise standards for noise-sensitive land uses (65 dB(A) CNEL). All seven sites are within City standards for less noise-sensitive uses such as office, retail, and industrial.



COMPATIBLE

The average noise level is such that indoor and outdoor activities associated with the land use may be carried out with essentially no interference from noise.



INCOMPATIBLE

The average noise level is so severe that construction costs to make the indoor environment acceptable for performance of activities would probably be prohibitive. The outdoor environment would be intolerable for outdoor activities associated with the land use.

Source: Progress Guide and General Plan (Transportation Element)

**TABLE 5.7-1
Noise Monitoring Readings in the Downtown Planning Area**

SITE	LOCATION	Noise Level (dB(A) CNEL)
1	San Diego City College Football Stadium Parking lot, East side of Stadium	66.1
2	Multi-Family Residence 17 th and F Streets, Southwest corner	69.1
3	Single-Family Residence 17 th and Island Streets, Northeast corner	61.4
4	Multi-Family Residence 17 th and K Streets	65.4
5	Multi-Family Residence Date Street and Eighth Avenue, South side of Date	70.4
6	Amici Park Date and Front Streets, Southwest corner	68.8
7	Washington Elementary School Playground State Street	65.8

Source: Giroux & Associates, 2005

With respect to downtown street grid noise, Table 5.7-2 shows existing traffic noise levels along select downtown street segments. The traffic study analyzed 36 representative links where an ADT comparison was made for the various development scenarios. These analyzed links represent north-south and east-west screen-line locations that are representative of traffic in/out and back/forth through the Centre City area. They cover only a partial spectrum of downtown traffic. The traffic noise analysis based upon the traffic study is therefore a representative sampling of a much wider pattern of future traffic noise changes.

Aircraft Noise

Aircraft is another noise source within the downtown planning area. The San Diego International Airport is located less than two miles away to the northwest. The 65 dBA CNEL contour extends into the northwest corner of the downtown planning area. Areas north of Grape Street experience noise in excess of 65 dB (A) CNEL. Substantial noise constraints are experienced in the area from Ivy to Laurel Streets. A very small section of the downtown planning area near Laurel Street experiences aircraft noise in excess of 75 dB (A) CNEL. Industrial or inactive uses such as parking structures or rental car storage are allowed in this area.

NAS North Island is located on Coronado Island across the San Diego Bay from the downtown planning area. The 65 dB (A) CNEL contour from this airfield does not extend into the downtown planning area and so does not generate sufficient noise to affect outdoor areas of sensitive land uses.

**TABLE 5.7-2
Representative Existing Street Grid Noise Levels**

DOWNTOWN ROADWAY	Noise Level (dB(A) CNEL)
<u>East-West Segments</u>	
Laurel Street (Harbor Drive to Pacific Highway)	70.1
Hawthorn Street (Columbia Street to State Street)	69.2
Grape Street (Columbia Street to State Street)	69.7
Ash Street (Sixth Avenue to Seventh Avenue)	65.3
A Street (Sixth Avenue to Seventh Avenue)	66.7
B Street (Sixth Avenue to Seventh Avenue)	65.6
C Street (15 th Street to 16 th Street)	65.5
Broadway (15 th Street to 16 th Street)	64.4
E Street (15 th Street to 16 th Street)	62.1
F Street (15 th Street to 16 th Street)	67.5
G Street (15 th Street to 16 th Street)	67.5
Market Street (15 th Street to 16 th Street)	66.5
Island Avenue (15 th Street to 16 th Street)	59.7
J Street (15 th Street to 16 th Street)	59.9
K Street (15 th Street to 16 th Street)	56.7
Imperial Avenue (15 th Street to 16 th Street)	62.2
Commercial Street ((15 th Street to 16 th Street)	55.4
National Avenue (Commercial to 16 th Street)	59.6
<u>North-South Segments</u>	
North Harbor Drive (Cedar Street to Beech Street)	62.0
Pacific Highway (Cedar Street to Beech Street)	66.1
Kettner Boulevard (Cedar Street to Beech Street)	63.4
India Street (Cedar Street to Beech Street)	61.5
State Street (Cedar Street to Beech Street)	61.7
First Avenue (Cedar Street to Beech Street)	68.7
Second Avenue (Cedar Street to Beech Street)	61.4
Third Avenue (Cedar Street to Beech Street)	59.4
Fourth Avenue (Cedar Street to Beech Street)	66.9
Fifth Avenue (Cedar Street to Beech Street)	66.4
Sixth Avenue (Cedar Street to Beech Street)	66.1

**TABLE 5.7-2 (Continued)
Representative Existing Street Grid Noise Levels**

DOWNTOWN ROADWAY	Noise Level (dB(A) CNEL)
Seventh Avenue (A Street to B Street)	62.9
Eighth Avenue (A Street to B Street)	61.7
Ninth Avenue (A Street to B Street)	61.1
Tenth Avenue (A Street to B Street)	67.5
Eleventh Avenue (A Street to B Street)	66.7
Twelfth Avenue (A Street to B Street)	68.0
16 th Street (Broadway to E Street)	65.4

Source: Giroux & Associates, 2005

Railroad Noise

Freight and commuter rail and the San Diego Trolley enter the downtown planning area on railroad tracks along California Street (one block west of Kettner), follow the planning area’s western and southern boundaries and exit the planning area on the railroad right-of-way north of Harbor Drive. Noise associated with the railroad takes two forms: the persistent noise of wheels along the tracks and the “nuisance” noise of sounding bells and horns.

Average hourly noise levels generated by railroad activity along California Street and Harbor Drive do not exceed 65 dB (A) CNEL. Train and trolley movements throughout the downtown area are relatively slow. Electric trolleys produce short-term noise levels of 75 dB (A) during single events, but the hourly average trolley noise along any track alignments is well below 65 dB (A) CNEL. Diesel train engines may produce short-term levels of 85 dB (A) during maneuvering events, but the duration of the noise is insufficient to create a measurable noise constraint except near the station where engines idle continuously during train turn-arounds.

Nuisance noise from train horns and crossing bells may reach a noise level of 95 dB (A) at a distance of 50 feet. This indicates that, in cases where there are no noise obstructions, noise could be audibly intrusive in residential interiors as much as 1,000 feet away.

Ballpark Noise

Petco Park is a unique noise source that affects surrounding noise sensitive uses on a periodic basis when baseball games or concerts are held. According to the SEIR prepared for the ballpark, significant noise impacts could occur within a four-block radius of the ballpark (CCDC 1999). Hourly average noise levels do not exceed 60 dB (A) CNEL beyond the physical ballpark boundary because most loud noise events tend to be brief. However, while crowd noise and/or amplified music would not exceed the exterior noise standard of 65 dB (A) CNEL, the noise levels are

sufficient to cause interior noise levels within buildings to exceed 45 dB (A) CNEL without noise attenuation.

Manufacturing/Industrial Noise

On-going cargo operations at the Tenth Avenue Marine Terminal generate noise from ship traffic, cargo handling equipment, and truck traffic. Except possibly ship horns, in-terminal activities are generally inaudible at off-site receivers because of distance and the intervening warehouse structures acting as sound barriers.

5.7.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse, direct environmental impact related to noise if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

- | | |
|-------------------------------------|--|
| Significance Criterion NOI-A | Generate noise levels which would exceed standards established by the City of San Diego Noise Abatement and Control Ordinance; |
| Significance Criterion NOI-B | Expose habitable areas of residences, medical facilities hospitals, and hotels schools, libraries or other noise sensitive uses to interior noise levels in excess of 45 dB (A) <u>CNEL</u> ; |
| Significance Criterion NOI-C | Expose required outdoor open space in residential developments to exterior noise levels in excess of 65 dB (A) <u>CNEL</u> ; or. |
| Significance Criterion NOI-D | Expose public parks and plazas to exterior noise levels in excess of 65 dB (A) <u>CNEL</u> . |

5.7.3 ENVIRONMENTAL IMPACTS

5.7.3.1 Noise Generators (NOI-A)

Temporary Impacts

Construction noise represents a temporary impact on ambient noise levels. Noise generated by construction equipment, which may include trucks, graders, bulldozers, concrete mixers and portable generators can reach high levels. The peak noise level for most construction equipment is 75 to 90 dB (A) at a distance of 50 feet. Pile drivers may have equipment noise levels in excess of 100 dB (A) at a distance of 50 feet. These noise levels are based upon worst-case conditions, and typically, noise levels near individual development sites would be less.

The development contemplated by the proposed Downtown Community Plan would result in construction noise impacts. However, the impact would not be significant as construction noise is regulated by the City of San Diego Municipal Code (Section 59.5.0404). This ordinance limits the hours of allowable construction activities and establishes performance standards for construction noise. Section 59.5.0404 of the Municipal Code states:

- A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator.
- B. Except as provided in Subsection C hereof, it shall be unlawful for any person, including the City of San Diego, to conduct any construction activities so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.
- C. The provisions of Subsection B of this section shall not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

Compliance with this ordinance would avoid significant noise impacts related to construction activity.

Long-term Impacts

It is anticipated that new development resulting from the Downtown Community Plan would not generate substantial noise to adversely affect the acoustic environment. The land use mix downtown is internally compatible, and the type of development envisioned by the proposed Plan would reflect this current mix. In addition, the Downtown Community Plan does not propose any new land use category that would result in substantial noise generation. In fact, the proposed Community Plan is sensitive to the noise that may result from development downtown and seeks to balance intensity with livability. The following goals and policies would serve to minimize long-term noise impacts from development:

Goal 13.4-G-1: Maintain a pleasant, livable sound environment alongside rising levels of activity and increasing mixing of uses;

Goal 13.4-G-2: Work with responsible agencies to mitigate to the extent possible severe noise impacts from un-changeable sources - such as railroads and freeways; and

Policy 13.4-P-4: Provide discretionary review process for night clubs, music halls, live-music performance venues, and other sources of loud noise to ensure compatibility with surrounding uses.

Two primary sources of noise would be allowed by the proposed Community Plan: entertainment and industrial sources. Entertainment noise sources include bars and night clubs as well as Petco Park. Industrial uses could also generate noise due to outside activities. Both noise sources are regulated by the San Diego Municipal Code to avoid significant noise/land use conflicts. Finally, it is acknowledged that urbanized areas have higher ambient noise levels than suburban residential areas or other less-developed neighborhoods in the region. They contribute to the excitement and vitality of the urban core. The expectation of quiet is considerably less in downtown areas than it is in residential suburbs or semi-rural areas. Therefore, future downtown residents would move downtown with the understanding that its mixed land uses and 24-hour orientation would be associated with higher ambient noise levels than those typically experienced in purely residential neighborhoods.

Impact NOI-A.1
Traffic Noise Increase

Traffic noise on nine of the grid street segments would significantly increase with implementation of the proposed Community Plan. The increased traffic volumes associated with the proposed Community Plan would result in a significant noise increase (>3.0 dB(A) CNEL for noise levels already exceeding 65 dB(A) CNEL, or causing a noise level to exceed the 65 dB(A) CNEL threshold) along nine street segments in the downtown planning area (see Table 5.7-3).

TABLE 5.7-3
Significant Street Noise Increases at Buildout (Year 2030)

STREET SEGMENT	PROPOSED PLAN NOISE LEVELS (dB(A) CNEL)	PROPOSED PLAN VS 1992 PLAN
Island Avenue (15 th Street to 16 th Street)	67.7	+8.0
J Street (15 th Street to 16 th Street)	66.1	+6.2
Imperial Avenue (15 th Street to 16 th Street)	66.0	+3.8
National Avenue (Commercial Street to 16 th Street)	67.7	+8.1
North Harbor (Cedar Street to Beech Street)	70.7	+8.7
Pacific Highway (Cedar Street to Beech Street)	71.5	+5.4
Kettner Boulevard (Cedar Street to Beech Street)	66.5	+3.1
Eighth Avenue (A Street to B Street)	68.8	+7.1
Ninth Avenue (A Street to B Street)	67.6	+6.5

Source: Giroux & Associates, 2005

All of the street segments in Table 5.7-3 would be significantly impacted as a result of the traffic generated by buildout of the Downtown Community Plan. However, as illustrated in Table 5.7-3, most of these impacts would have occurred under the current 1992 Plan as well. Of the impacted streets, only the Kettner Boulevard segment would not experience an increase of more than 3 dB (A) CNEL under the 1992 Plan. One street segment (National Avenue) would experience an individually significant increase (+4.4 dB (A) CNEL) with implementation of the proposed Downtown Community Plan when compared to noise levels under the 1992 Plan.

The additional traffic on the freeways serving downtown would not result in a significant increase in traffic noise from these roadways. For instance, an anticipated increase of 68,000 ADT along I-5 between SR-163 and Sixth Avenue at buildout would increase noise levels by only 1.16 dB (A) CNEL and extend the 65 dB(A) contour 75 feet due to the fact that existing automobile trips on this segment are already very high.

5.7.3.2 INTERIOR NOISE (NOI-B)

Traffic Noise

<p>Impact NOI-B.1 Interior Traffic Noise</p>

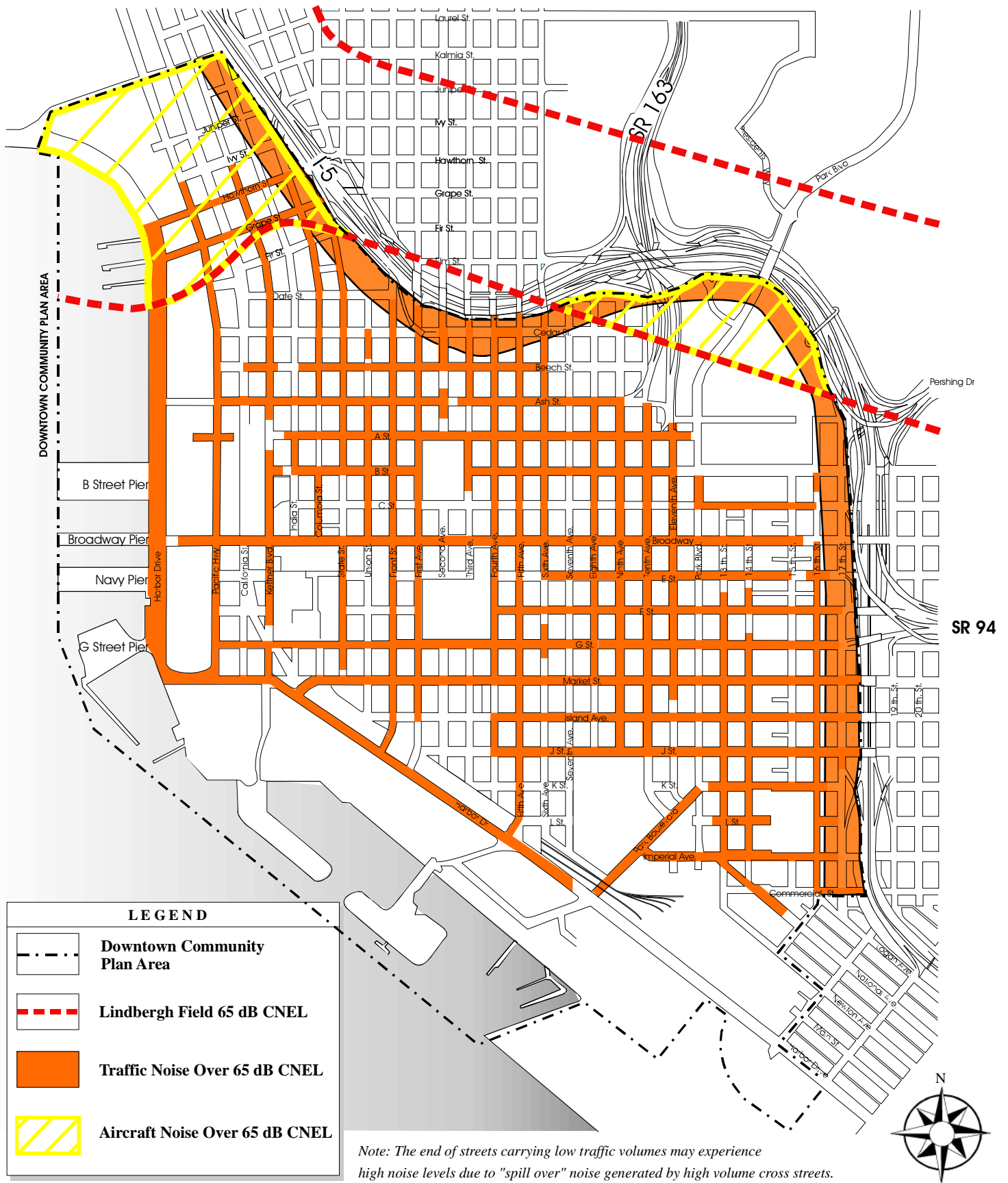
Segments of grid streets downtown as well as I-5 are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL and, thus, could result in interior noise levels in excess of 45 dB(A) CNEL. As illustrated in Figure 5.7-2 a number of street segments downtown are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL. Table 5.7-4 identifies levels on the 36 street segments evaluated in the traffic study. Those street segments which are expected to ultimately carry sufficient daily traffic volumes to generate noise levels in excess of 65 dB(A) CNEL are highlighted. As evident on Figure 5.7-2, a number of streets are only partially affected by noise. High traffic noise levels on cross streets are responsible for this phenomenon because the traffic noise from the high volume street overlaps the nearest portion of the low volume street. Noise sensitive uses within 475 feet of I-5 could be impacted as well. Any habitable areas associated with future residential or other noise-sensitive land use facing these highlighted segments could experience interior noise levels in excess of 45 dB(A) CNEL if adequate insulation is not provided.

Adherence to Title 24 of the California Code and the Building Code, would assure that interior noise levels in habitable rooms of residential development and hotels would not exceed 45 dB(A) CNEL. Thus, no significant impacts from traffic noise would occur to these uses. However, Title 24 does not apply to non-residential noise-sensitive uses. Thus, habitable rooms in these uses located in areas where exterior noise levels may exceed 65 dB(A) CNEL may experience interior noise levels in excess of 45 dB(A) CNEL.

Policy 13.4-P-3: Require construction techniques that mitigate interior noise near freeways – in areas of 65 dB (A) CNEL or greater – pursuant the City of San Diego’s Municipal Code, such as greater insulation, reinforced windows, ventilation systems, and limited outdoor exposure.

Airport Noise

Aircraft noise associated with San Diego International Airport would exceed 65 dB(A) CNEL in the northern portion of downtown. Consequently interior noise levels in habitable rooms could exceed 45 dB(A) CNEL. However, compliance with Title 21, as well as Title 24 and the Building Code, would assure that interior noise levels of habitable rooms in single- as well as multi-family development would not exceed 45 dB(A) CNEL. Thus, no significant interior noise impacts would occur on future residential development within the 65 dB(A) CNEL aircraft noise contour.



Source: Giroux and Associates, 6/2005, Lindbergh Field 2004 Noise Contours for Downtown Community Plan Area

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**TABLE 5.7-4
Representative Future Street Grid Noise Levels that Exceed 65 dB(A) CNEL**

DOWNTOWN ROADWAY	Noise Level (dB(A) CNEL)
<u>East-West Segments</u>	
Laurel Street (Harbor Drive to Pacific Highway)	72.6
Hawthorn Street (Columbia Street to State Street)	71.4
Grape Street (Columbia Street to State Street)	72.3
F Street (15 th Street to 16 th Street)	70.2
G Street (15 th Street to 16 th Street)	70.4
Market Street (15 th Street to 16 th Street)	68.1
Island Avenue (15 th Street to 16 th Street)	67.7
J Street (15 th Street to 16 th Street)	66.1
Imperial Avenue (15 th Street to 16 th Street)	66.0
National Avenue (Commercial to 16 th Street)	67.7
<u>North-South Segments</u>	
North Harbor Drive (Cedar Street to Beech Street)	70.7
Pacific Highway (Cedar Street to Beech Street)	71.5
Kettner Boulevard (Cedar Street to Beech Street)	66.5
First Avenue (Cedar Street to Beech Street)	70.0
Fourth Avenue (Cedar Street to Beech Street)	68.5
Fifth Avenue (Cedar Street to Beech Street)	69.1
Sixth Avenue (Cedar Street to Beech Street)	68.0
Eighth Avenue (A Street to B Street)	68.8
Ninth Avenue (A Street to B Street)	67.6
Tenth Avenue (A Street to B Street)	68.6
Eleventh Avenue (A Street to B Street)	68.0
Twelfth Avenue (A Street to B Street)	69.3
16 th Street (Broadway to E Street)	67.3

Source: Giroux & Associates, 2005

Aircraft noise impacts would be reduced by implementation of the following policy of the Community Plan:

Policy 13.3-P-1: “Noise Sensitive Uses. Use the City of San Diego’s adopted noise contour boundaries and use regulations as included in the Municipal Code.”

Railroad Noise

Assuming railroad activity (train and trolley) remains relatively similar to the current condition, railroad operations would not result in a significant direct noise impact because they would not exceed the exterior standard of 65 dB (A) CNEL.

While railroad noise would not exceed the standard, intermittent noise generated by the horns and crossing bells would represent a source of nuisance for nearby residents. Nuisance noise from train horns and crossing bells may reach a noise level of 95 dB (A) at a distance of 50 feet. This indicates that, in cases where there are no noise obstructions, noise could be audibly intrusive in residential interiors as much as 1,000 feet away. Although nuisance noise is intermittent and not considered to significantly affect human activity, the Downtown Community Plan would seek to minimize these noise occurrences from railroad activity by including the following goals and policies:

Policy 13.4-P-1: Continue working toward innovative solutions with railroad operators to balance public safety, urban design, and heritage goals.

Policy 13.4-P-2: Apply for a downtown quiet zone, to include the 13 railway crossings, and enforce ban on sounding of horns, bells, and whistles.

Ballpark Noise

Impact NOI-B.2
Interior Ballpark Noise

Noise generated during ballgames or concerts at Petco Park would have a significant direct impact on nearby noise sensitive uses. As discussed earlier, noise from crowds or amplified music could cause interior noise levels to exceed 45 dB (A) CNEL within four blocks for the ballpark. However, exterior noise levels would not exceed acceptable levels when average over a 24-hour period.

Manufacturing/Industrial Noise

Most noise generating activity at the Tenth Avenue Marine Terminal is generally inaudible off-site because of distance and intervening structures. Trucking activity associated with the Marine Terminal may create substantial noise along downtown roadways. However, most Marine Terminal trucks use Crosby Street for access. Structures along this street confine the vehicle noise within a limited corridor without expanding far into the community. Crosby Street is on the fringe of the planning area (extreme southeast corner). Therefore, the location of the truck access street in addition to the confinement of noise to the immediate vicinity would not create adverse impacts to new sensitive uses resulting from implementation of the Downtown Community Plan.

5.7.3.3 EXTERIOR NOISE IN RESIDENTIAL DEVELOPMENT (NOI-C)

Traffic Noise

Impact NOI-C.1
Exterior Traffic Noise in
Residential Development

Segments of grid streets downtown as well as I-5 are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL and, thus, could expose required outdoor open space to noise levels considered unacceptable. Outdoor activities such as swimming and barbecuing are more enjoyable in areas where background traffic noise levels are less than 65 dB(A) CNEL because higher levels interfere with normal conversation. Therefore, residential recreation activities in areas above 65 dB(A) CNEL would be significantly impacted.

Airport Noise

Impact NOI-C.2
Exterior Aircraft Noise in
Residential Development

Aircraft noise associated with San Diego International Airport would impact required outdoor open space within residential development located in the northern portion of downtown. The existing CLUP for San Diego International Airport indicates that aircraft noise levels in the northwestern portion of the downtown planning area would be in excess of 65 dB(A) CNEL, as shown in Figure 5.7-2. None of the plan area lies within the 65 dB(A) CNEL contour for NAS North Island. As a result, residential and other noise-sensitive uses in the northern portion of the plan area would experience noise levels that would exceed 65 dB(A) CNEL. While future residential units would be required by Title 21 to achieve a ~~45-CNEL~~ dB(A) level in all habitable rooms, traditional noise attenuation for exterior noise (e.g. walls) would be ineffective as the noise source would be vertical rather than lateral. Thus, required outdoor open space areas in new residential development could be significantly impacted by aircraft noise.

5.7.3.3 EXTERIOR NOISE IN PUBLIC PARKS AND PLAZAS (NOI-D)

Traffic Noise

Impact NOI-D.1
Exterior Traffic Noise in Public
Parks and Plazas

Segments of grid streets downtown as well as I-5 are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL and, thus, could expose public parks and plazas to noise levels considered unacceptable. Recreation activities in these parks and plazas including picnicking, conversations, and other activities are more enjoyable in areas where background traffic noise levels are less than 65 dB(A) CNEL because higher levels interfere with normal conversation. Therefore, recreation activities in public parks and plazas above 65 dB(A) CNEL would be significantly impacted.

Airport Noise

Impact NOI-D.2

Exterior Aircraft Noise in
Public Parks and Plazas

Aircraft noise associated with San Diego International Airport would impact recreation activities within public parks and plazas located in the northern portion of downtown. The existing CLUP for San Diego International Airport indicates that aircraft noise levels in the northwestern portion of the downtown planning area would be in excess of 65 dB(A) CNEL, as shown in Figure 5.7-2. None of the plan area lies within the 65 dB(A) CNEL contour for NAS North Island. As a result, recreation activities within public parks and plazas in the northern portion of the plan area would experience noise levels that would exceed 65 dB(A) CNEL. Thus, recreation activities in affected public parks and plazas could be significantly impacted by aircraft noise.

5.7.4 MITIGATION MEASURES

Impact NOI-A.1 Traffic Noise Increase

No feasible mitigation measures are available to reduce the significant increase in traffic noise on affected roadway segments. In most cases, insufficient room exists to construct a noise attenuation wall to reduce exterior traffic noise and, if feasible, the wall would only protect ground level areas. While buildings within the affected area could be retrofitted to attenuate the effects of the noise increase, implementation of such a mitigation strategy is not considered feasible given the expected cost and complexity associated with undertaking such a program. As the impact would be aggregate in nature, the obligation to carry out this program would not fall upon any single development. Lastly, existing property owners must consent to the retrofit. As some owners may choose not to allow the retrofitting, the impact could remain unmitigated.

Impact NOI-B.1 Interior Traffic Noise

Mitigation Measure NOI-B.1-1: Prior to approval of a Building Permit for any residential, hospital, or hotel noise-sensitive use (excluding residential and hotel uses) within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.

Impact NOI-B.2 Interior Ballpark Noise

Mitigation Measure NOI-B.2-1: Prior to approval of a Building Permit for any noise-sensitive land uses within four blocks of Petco Park, an acoustical analysis shall be performed. The analysis shall confirm that architectural or other design features are included in the design which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.

Impact NOI-C.1 Exterior Traffic Noise in Residential Development

Mitigation Measure NOI-C.1-1: Prior to approval of a Development Permit for any residential development within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any required outdoor open

space areas would be exposed to noise levels in excess of 65 dB(A) CNEL. ~~As feasible, noise attenuation measures shall be identified which would maintain noise levels in required outdoor recreation areas to a level below 65 dB(A) CNEL. Recommended measures shall be incorporated into building plans before approval of a Building Permit. Provided noise attenuation would not interfere with the primary purpose or design intent of the exterior use, measures shall be included in building plan, to the extent feasible.~~

Impact NOI-C.2 Exterior Aircraft Noise in Residential Development

No feasible mitigation measures are available to reduce outdoor aircraft noise.

Impact NOI-D.1 Exterior Traffic Noise in Public Parks and Plazas

Mitigation Measure NOI-D.1-1: Prior to approval of a Development Permit for any public park or plaza within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any recreation areas would be exposed to noise levels in excess of 65 dB(A) CNEL. ~~As feasible, noise attenuation measures shall be identified which would maintain noise levels in recreation areas to a level below 65 dB(A) CNEL. Recommended measures shall be incorporated into building plans before approval of a Building Permit. Provided noise attenuation would not interfere with the intended recreational use or park design intent, measures shall be included, to the extent feasible.~~

Impact NOI-D.2 Exterior Aircraft Noise in Public Parks and Plazas

No feasible mitigation measures are available to reduce outdoor aircraft noise.

5.7.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impact NOI-A.1 Traffic Noise Increase

Level of Significance After Mitigation: Significant

As discussed earlier, no feasible mitigation measures exist to protect existing noise-sensitive uses from experiencing noise levels in excess of 65 dB (A) CNEL. Therefore, the impact would be significant and unmitigated.

Impact NOI-B.1 Interior Traffic Noise

Level of Significance After Mitigation: Not Significant

Implementation of Title 24 and Building Code requirements for residential development and Mitigation Measure NOI-B.1-2 for all other noise-sensitive uses would reduce interior noise impacts to below a level of significance by requiring noise levels in habitable rooms to not exceed 45 dB(A) CNEL. Thus, this impact is considered significant but mitigable.

Impact NOI-B.2 Interior Ballpark Noise**Level of Significance After Mitigation: Not Significant**

Implementation of the noise attenuation measures identified in the acoustical analysis required by Mitigation Measure NOI-B.3-1 would be expected to be capable of reducing interior noise levels to 45 dB (A) CNEL. Thus, the impact is considered potentially significant but mitigable.

Impact NOI-C.1 Exterior Traffic Noise in Residential Development**Level of Significance After Mitigation: Significant**

Implementation of Mitigation Measure NOI-C.1-1 would reduce noise impacts on required open space areas. However, without knowing the exact spatial relationship of the open space areas to the traffic noise source for each future development, it is impossible to know whether every future development would be able to maintain noise levels below 65 dB(A) CNEL. Furthermore, full attenuation of noise may be contrary to the goal of creating outdoor open space. If full enclosure of the open space would be required to fully attenuate noise, it would defeat the basic goal of providing “outdoor” open space. Thus, the impact is considered potentially significant and unmitigable.

Impact NOI-C.2 Exterior Aircraft Noise in Residential Development**Level of Significance After Mitigation: Significant**

No mitigation measures are available to reduce outdoor aircraft noise. While full enclosure of the open space could reduce noise levels to less than 65 dB(A) CNEL, this would defeat the primary goal of providing “outdoor” open space. Thus, the impact is considered potentially significant and unmitigable.

Impact NOI-D.1 Exterior Traffic Noise in Public Parks and Plazas**Level of Significance After Mitigation: Significant**

Implementation of Mitigation Measure NOI-D.1-1 would reduce noise impacts on public parks and plazas. However, without knowing the exact spatial relationship to the traffic noise source for each future public park or plaza, it is impossible to know whether every park or plaza would be able to maintain noise levels below 65 dB(A) CNEL. Furthermore, full attenuation of noise may be contrary to the goal of creating outdoor recreation opportunities. If full enclosure of the open space would be required to fully attenuate noise, it would defeat the basic goal of providing “outdoor” open space. Similarly, exterior walls enclosing parks and plazas would diminish the recreational experience of persons using these facilities by walling them off from the surrounding community. Thus, the impact is considered potentially significant and unmitigable.

Impact NOI-D.2 Exterior Aircraft Noise in Residential Development**Level of Significance After Mitigation: Significant**

No mitigation measures are available to reduce outdoor aircraft noise. While full enclosure of the open space could reduce noise levels to less than 65 dB(A) CNEL, this would defeat the primary goal of providing “outdoor” open space. Thus, the impact is considered potentially significant and unmitigable.

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5.8 AIR QUALITY

5.8.1 EXISTING CONDITIONS

Giroux and Associates conducted an air quality study (May 2005) for the proposed Downtown Community Plan. The following analysis is based on this report, which is contained in Appendix 2.7 to this EIR.

5.8.1.1 Climate and Meteorology

The downtown planning area is located in the San Diego Air Basin (SDAB), which is coterminous with San Diego County. The climate in the San Diego region is characterized by a repetitive pattern of frequent early morning cloudiness, hazy afternoon sunshine, clean daytime onshore breezes, and relatively consistent year-round temperatures. An average of ten inches of rain falls each year from November to early April, while the remainder of the year is typically dry. Measurable rain falls on 20 days per year, with only six days of moderate (0.5 inches in 24-hours) rainfall per year.

On a regional scale, these atmospheric conditions create desirable living conditions; however, they also facilitate poor air quality conditions. More specifically, the ability of the atmosphere to disperse air pollutants is limited. The onshore winds across the coastline diminish quickly when they reach the foothill communities east of San Diego. The sinking air within the onshore high pressure system forms a massive temperature inversion that traps all air pollutants near the ground. The resulting stagnation, in addition to the ample sunshine, cause a number of reactive pollutants to undergo photochemical reactions. Through these reactions, smog is formed. Occasionally, high smog levels in coastal communities occur when polluted air from the South Coast Air Basin (the greater Los Angeles and Orange County area) drifts seaward and southward at night, and then blows onshore the next day. Regardless of local air pollution control efforts in San Diego, such interbasin transport will occasionally cause unhealthy air.

On a local scale, a second inversion type occurs when cool air at night stagnates above the ground, while the air aloft remains warm. The inversion may trap vehicular exhaust pollutants, such as carbon monoxide (CO), near their source until the inversion dissipates as a result of surface warming the next morning. Such CO “hot spots” most often occur on freeways, large parking lots, and at times, within the “street canyons” of the downtown area. CO “hot spots” are highly localized in space and time (if they occur at all), and continued improvement in vehicular emissions have led to the near disappearance of CO “hot spots” even in the downtown San Diego area.

5.8.1.2 Air Quality Standards

Federal and State ambient air quality standards designate maximum levels of background pollution considered acceptable (with an adequate margin of safety) to protect public health, safety, and welfare. They are designed to protect “sensitive receptors” which include persons susceptible to respiratory distress (asthmatics), the elderly, very young children, people already weakened by disease or illness, and persons engaged in strenuous work or exercise. The numbers of days of which pollutant levels exceed State and/or Federal criteria are used to evaluate air quality.

National Ambient Air Quality Standards

The National Ambient Air Quality Standards (NAAQS) were developed by the Environmental Protection Agency in response to requirements set forth by the Federal Clean Air Act of 1970. Standards have been set for six pollutants including: ozone (O₃), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), lead, and total suspended particulate matter smaller than 10 microns in diameter (PM₁₀). In addition, it is anticipated that national standards for suspended particulate matter with diameters of 2.5 microns or less (PM_{2.5}) will be adopted in the future. Federal standards for these pollutants are not to be exceeded more than once per year. The EPA has also allowed states the option of developing stricter standards than the NAAQS. Since California established air quality standards before the NAAQS were developed, there are considerable differences between California and Federal clean air standards. In those instances where State and Federal standards differ, the more restrictive one(s) apply.

California Ambient Air Quality Standards

Due to the unique air quality problems in California, the California Air Resources Board (CARB) has developed more stringent standards for the six NAAQS pollutants, and has included sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulates in its California Ambient Air Quality Standards (CAAQS). State standards for ozone, CO, NO_x, SO₂, and PM₁₀ are not to be exceeded. The standards for the other air pollutants are not to be equaled or exceeded.

Air Quality Management Planning

In 1979, the EPA required each state to prepare a SIP to bring every non-attainment air basin within the United States into compliance with all NAAQS. SIPs are documents that contain air quality goals, strategies, schedules, and enforcement actions that must be implemented by each non-attainment air basin. Due to continued violations of NAAQS standards in the San Diego Air Basin (SDAB), the San Diego Air Pollution Control District (APCD), in conjunction with the San Diego Association of Governments (SANDAG), prepared a Regional Air Quality Strategy (RAQS) for its portion of the SIP in the early 1970's (revised in 1979 and 1982). The initial RAQS targeted attainment (achieving air quality standards) by 1982, although this goal was not achieved. In 1982, extensions until 1987 were granted to many air basins (including SDAB). No further revisions to the 1982 RAQS were made by the APCD until Congress enacted new Federal Clean Air Act amendments in 1990.

The 1989 California Clean Air Act (AB 2595) also mandates that non-attainment districts develop an air quality management plan (AQMP), which is to be updated every three years, to meet both State and Federal standards as soon as possible. Subsequently, the APCD and SANDAG revised the federally mandated RAQS to reflect State standards. The first State RAQS for the SDAB was developed in 1991 from pollution sources located within the air basin, although little can be done about interbasin transport. The revised 1994 State RAQS, which were approved by EPA in 1996, found that the SDAB, in the absence of interbasin transport can meet the Federal ozone standard by the year 1999 without the creation of any new control programs not already in progress. Accordingly, the EPA reclassified the SDAB from "severe" to "serious." Any violations of ozone standards in the year 2000 or beyond are forecast to occur only on days when transport from the Los

Angeles Air Basin creates substantially elevated baseline levels upon which any local basin impacts would be exacerbated.

Currently the SDAB has met the attainment standard for all air pollutants monitored, including carbon monoxide, with the exception of PM₁₀ and ozone. The SDAB is non-attainment for ozone based on both the federal and state standards, and non-attainment for PM₁₀ based on the state standard only.

In addition to preparing RAQS, other duties delegated to the APCD include: the regulation of stationary air pollution sources; air quality monitoring; emission inventories; air quality analyses and forecasts; and, enforcement of all Federal and State air quality standards within the SDAB. Before permits to generate any new emissions are granted for a project, APCD rules and regulations require that sources of potential air pollutants be remediated prior to construction by the following: using control equipment (scrubber, oxidizer, etc.); verification that any public health risk does not exceed “de minimus” levels; the removal of asbestos containing material (ACM) and lead-based paint (LBP) prior to structural demolition; and, specific procedures that must be used to minimize potential airborne releases of hazardous/toxic materials.

5.8.1.3 Sources of Pollution

Nitrogen oxides (NO_x) and reactive organic gases (ROG) are the two precursors of photochemical smog. In San Diego County, 68% of the 310 tons of ROG emitted per day comes from mobile sources (cars, planes, heavy equipment, etc.). For NO_x, 88% of the 240 tons emitted per day is from mobile sources. In addition, polluted air from the South Coast Air Basin (Los Angeles) occasionally drifts into San Diego by interbasin transport, which blows pollutants seaward and southward at night, and then onshore the next day. Computer modeling of smog formation has shown that a reduction of about 25% for NO_x and ROG would allow the San Diego Air Basin to meet the Federal ozone standard on days when there is no substantial interbasin transport from other airsheds. However, no matter what San Diego County does to achieve clean air in the SDAB, such interbasin transport will occasionally result in unhealthy air over much of the County despite its ongoing effort to control air pollution.

In urbanized areas, projects that add to the regional trip generation increase the vehicle miles traveled (VMT) within the overall airshed and add traffic to the local roadway systems in the vicinity of the project site which can cause substantial air quality impacts. This is particularly true if the area is already in non-compliance with Federal and/or State air quality standards (e.g., SDAB). Furthermore, if such traffic occurs when atmospheric ventilation is poor, a large number of vehicles “cold started” and operating at pollution inefficient speeds, and roadways already congested with non-project traffic, microscale air pollution “hot spots” can form in the area immediately around points of congested traffic.

Air quality can also be negatively impacted by secondary pollution sources such as dusts, fumes, paints, thinners or solvents used in construction and maintenance activities; increased fossil-fuel combustion in power plants; emissions from nearby gas stations; increased visitor air travel to and from the area; tire dust from wear; and re-suspended roadway dust. These emissions are typically either temporary or very small in comparison to project-related vehicular emissions. In addition to small airborne dust particulates, construction also generates many large particles that can settle on

parked cars, benches, and other nearby horizontal surfaces creating a soiling nuisance and a possible unhealthy air quality effect.

Baseline Air Quality

Downtown air quality can be best characterized from ambient measurements made by the San Diego County APCD, the agency responsible for air quality planning, monitoring and enforcement in the SDAB. The APCD air quality monitoring station located on Twelfth Avenue in downtown San Diego is the closest station to the development area that monitors the full spectrum of air quality. Healthful air quality is seen in almost every pollution category. No national air quality standards were exceeded during the last six years (one violation per year is allowed under federal guidelines). The more stringent State standards for ozone and the State standard for PM₁₀ were infrequently exceeded. Levels of carbon monoxide or nitrogen oxides, which are more indicative of local source/receptor relationships, are very low at this downtown monitoring station.

With only two violations of the federal 1-hour ozone standard in five years from 1999 - 2003 in the region, SDAPCD initiated a request for re-designation of the basin as “attainment” for the 1-hour standard. That request was granted in 2003. The 8-hour ozone standard is, however, still exceeded frequently at the Alpine air monitoring station. The basin was designated as “non-attainment” for the 8-hour federal standard. However, no major change in the attainment planning process is anticipated. The attainment plan will continue to contain emissions reduction programs to achieve the 8-hour standard now that the 1-hour standard has been met.

5.8.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse, environmental impact related to air quality if the goals, policies, objectives or regulations established by the planning documents, and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion AQ-A Conflict with or obstruct implementation of the County’s Regional Air Quality Strategies or the State Implementation Plan; or

Significance Criterion AQ-B Expose sensitive receptors to substantial air contaminants including smoke, charred paper, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health. Based on thresholds used by the City of San Diego, emission generation in excess of the following daily levels would be considered significant.

<u>Emission</u>	<u>Level (lbs/day)</u>
Carbon Monoxide (CO)	500
Reactive Organic Gases (ROG)	55
Nitrogen Oxides (NO _x)	250
Sulfur Oxides (SO _x)	250
Particular Matter (PM ₁₀)	100

5.8.3 ENVIRONMENTAL IMPACTS

5.8.3.1 Relationship to Regional Air Quality Planning (AQ-A)

Although implementation of the proposed Plan would substantially increase the air emissions generated from downtown with respect to current levels, the proposed land use plan would not conflict with regional air quality planning because it would implement many of the strategies and policies established by regional plans to reduce air pollution. Most notably, the mixed-use emphasis would implement an important technique to reduce mobile source emission by co-locating housing and employment opportunities. In addition, the downtown area is well-served by a variety of transit opportunities including light rail (the Trolley), commuter trains (the Coaster) and bus service. BRT service planned for downtown would also reduce mobile source emissions in the SDAB.

More specifically, the proposed Community Plan represents “smart growth” that would achieve the following strategies identified by the San Diego Air Pollution Control District:

- Designate future transit corridors and rail station sites as “Transit Focus Areas,” and zone such areas for compact, pedestrian-oriented development;
- Incorporate residential uses in existing employment areas;
- Designate a central business core and direct commercial uses there, enabling ridesharing and daytime worker errands on foot; and,
- Promote revitalization and infill development in mixed-use core areas.

Therefore, the proposed Community Plan would be consistent with air quality/land use planning strategies and regional air quality planning.

5.8.3.2 Expose Sensitive Receptors to Unacceptable Emission Levels (AQ-B)

Implementation of the proposed Community Plan would result in potential air quality impacts related to air emission generators and receptors. Air emission generators fall into three main categories: construction, mobile-source and stationary-source. Construction emissions are normally considered short-term as they often last less than one year. However, as construction is expected to occur throughout the buildout of downtown, these emissions sources may be short-term with respect to any one location but present on a long-term basis somewhere within downtown. The majority of air emissions will be generated by mobile sources, primarily automobile use. Stationary sources include increased power plant emissions; on-site combustion emissions from natural gas and other fuels; and small population activity-related emissions sources. The total levels of daily emissions generated by existing development and buildout under the proposed Community Plan is illustrated in Table 5.8-1.

TABLE 5.8-1
Daily Emissions Generated by Community Plan Development

	ROG (lbs/day)	NOx (lbs/day)	CO (lbs/day)	SOx (lbs/day)	PM₁₀ (lbs/day)
Existing					
Stationary Sources	726.1	152.7	65.6	0.0	0.3
Mobile Sources	8,460.1	11,366.9	113,950.	100.0	9,764.4
Construction Sources	7.2	107.2	23.6	7.6	57.9
EXISTING TOTAL	9,193.4,	11,626.8	114,039.6	107.6	9,822.6
Year 2030 (Proposed Plan)					
Stationary Sources	2,631.1	497.4	210.9	0.0	1.0
Mobile Sources	3,422.2	3,469.5	40,899.2	117.9	20,528.5
Construction Sources	7.2	107.2	23.6	7.6	57.9
BUILDOUT TOTAL	6,060.5	4,074.1	41,133.7	125.6	20,587.4

Construction Emissions

Impact AQ-B.1 Construction Emissions

Particulates generated during construction activities could exceed acceptable local standards and pose a health risk to nearby sensitive receptors. Emissions related to construction activity are considered short-term sources as their duration is limited to the period of construction at any single site within downtown. However, as construction may occur throughout the buildout process for downtown, these construction emissions would normally be present at various locations throughout downtown.

In order to estimate the amount of construction emissions generated by development, the air quality analysis, contained in Appendix 2.7, makes several assumptions regarding construction. First, it is assumed that the amount of land under construction at any one time would normally be less than five acres and rarely exceed 10 acres. Construction is assumed to occur 200 days per year.

Dust

Dust would be created during clearing, grading, excavation and building assembly of various developments within the downtown planning area. Three types of dust emissions may be associated with construction; the types are categorized according to the diameter of the particles.

Large particulate matter is over 10 microns in diameter. The majority of large particles generated during construction are heavy enough to settle out of the air close to the source; often within 100 feet. As large particles are easily filtered by human breathing passages, they represent a soiling nuisance rather than any potentially unhealthy air quality impact. With west to east winds, dust

soiling potential would likely be greatest directly east of any development site. While large particulate deposition can be minimized, it often cannot be completely eliminated. While temporary soiling would represent a nuisance, it would not constitute a significant air quality impact.

Particulate matter which ranges in diameter between 10 and 2.5 microns is referred to as PM_{10} . This form of particulate is considered a potential health risk because is small enough to enter deep lung tissue. State and federal ambient air quality standards have been established for PM_{10} . The PM_{10} fraction of TSP is assumed to be around 50 percent.

The smallest particulate matter, referred to as $PM_{2.5}$, is characterized by a diameter of less than 2.5 microns. $PM_{2.5}$ material is capable of reaching deepest lung tissue and causing the most adverse health impacts. The primary source of $PM_{2.5}$ material is from combustion of diesel fuel by construction equipment, referred to as diesel particulate matter (DPM). A discussion of $PM_{2.5}$ effects is provided in the following discussion of engine emissions.

Engine Emissions

Construction requires heavy equipment operations to prepare the ground, excavate for utilities and services, and perform building construction. Construction activities use diesel-fueled equipment that emits DPM in its exhaust. DPM is a known carcinogen. Individual cancer risk at any nearby receptor is calculated by assuming that a person sits continuously outside of their home for the next 70 years while breathing exhaust pollutants. The excess cancer risk from construction activities due to DPM is typically less-than-significant because:

- Construction activities last only a few months out of the 70-year risk “window;”
- Many people are gone during the daytime when equipment is operating, and do not remain outside their home continuously when they are home; and
- Emissions standards for new construction equipment require soot filters that will make the equipment fleet for future major construction activities much cleaner than the current fleet.

Combined Construction Emissions

Together, the dust and construction equipment emissions would be considered significant as they would exceed the City’s daily standard for Particulate Matter. The total maximum daily construction emissions are illustrated in Table 5.8-2.

Hazardous Materials

If any existing structures to be demolished or renovated were built when hazardous compounds were routinely used as building products, they may have asbestos containing materials (ACMs), lead based paint (LBP), or other harmful building materials within their structures. Any demolition or renovation would require a pre-construction hazards assessment. If such materials are present, particularly asbestos, a number of strictly-regulated remediation procedures would be required to be implemented. Thus, the potential for air quality impacts due to hazardous building materials would be less-than-significant.

**TABLE 5.8-2
Total Average Daily Construction Emissions**

POLLUTANT	DAILY EMISSIONS (LBS/DAY)	CITY OF SAN DIEGO THRESHOLD (LBS/DAY)	PERCENT OF DAILY THRESHOLD
CO	23.6	550	4.2
ROG	7.2	55	13.1
NO _x	107.2	250	42.9
SO _x	7.6	250	3.0
PM ₁₀	57.8	100	57.8

Mobile Source Emissions

The bulk of the development-related impacts would derive from the trips generated by any land use intensification within the downtown area. Table 5.8-1 illustrates the daily emissions projected in the year 2030 related to both mobile- and stationary-source emissions; although mobile-source emissions would comprise the dominant proportion of these emissions. The direct impact of the mobile-source emissions resulting from buildout of downtown under the proposed Community Plan would not be significant. However, these emissions would combine with other emissions in the San Diego Air Basin to create significant cumulative air quality impacts as discussed in Chapter 6.0.

As indicated in Table 5.8-1, the future vehicular emissions levels associated with the proposed Downtown Community Plan development, while substantial, would be lower than the currently existing vehicle emissions for ROG, NO_x, and CO. These estimates are based on a computer model developed by the California Air Resources Board. The model uses EMFAC2002 statewide emissions forecasting methodologies which are mandated by EPA for use by all air quality planning agencies in forecasting emissions as part of any attainment planning programs. EMFAC2002 incorporates all existing emission control programs and forecasts the future vehicular fleet make-up using historical patterns of car buying/retention behavior. Thus, the general decrease in emission levels This is attributed to the fact that vehicles are becoming more “clean” with improvements in technology and programs designed to reduce harmful emissions. PM₁₀ emissions primarily derive from roadway dust, and tire or brake wear. Little PM₁₀ derives from engine exhaust except for heavy trucks. PM₁₀ emission rates thus would grow in direct proportion to downtown development without benefiting from continued emissions reductions from a cleaner vehicle fleet.

In order to confirm that there would not be a substantial spike in the mobile source emissions prior to buildout due to delays in the effects of clean air requirements, the mobile source emissions in five-year increments were calculated using a linear growth assumption for downtown (Table 5.8-3). For example by the year 2010, 20 percent of new growth was assumed to occur and 40 percent was assumed by the year 2015. As a review of this table indicates, the general trend toward lower emissions occurs in the early years as well as later years.

TABLE 5.8-3
Emissions Comparisons for Assumed Linear Growth (lbs/day)

<u>YEAR</u>	<u>ROG</u>	<u>NO_x</u>	<u>CO</u>	<u>SO₂</u>	<u>PM-10</u>
<u>2005</u>	<u>9,186</u>	<u>11,520</u>	<u>114,016</u>	<u>100</u>	<u>9,765</u>
<u>2010</u>	<u>8,190</u>	<u>9,757</u>	<u>95,206</u>	<u>70</u>	<u>12,094</u>
<u>2015</u>	<u>6,909</u>	<u>7,146</u>	<u>70,193</u>	<u>82</u>	<u>14,332</u>
<u>2020</u>	<u>6,498</u>	<u>5,769</u>	<u>59,009</u>	<u>94</u>	<u>16,491</u>
<u>2025</u>	<u>6,012</u>	<u>4,545</u>	<u>45,563</u>	<u>107</u>	<u>18,553</u>
<u>2030</u>	<u>6,053</u>	<u>3,967</u>	<u>41,100</u>	<u>118</u>	<u>20,529</u>

While all mobile source emissions could represent a health risk when combined with other emissions within the SDAB, CO emissions may create localized health effects if sufficiently concentrated due primarily to traffic congestion. An evaluation of the potential for future CO problems (commonly referred to as “hot spots”) as result of implementation of the proposed Plan was conducted in Appendix 2.7. Based on anticipated traffic congestion, the intersections with the potential for the highest CO levels near sensitive land uses in the development area were analyzed. Based on this analysis, no future CO “hot spots” are forecast at any intersection near the development area with the additional traffic generated by the proposed Plan. Thus, CO “hot spot” impacts are considered less-than-significant.

The proposed Community Plan includes a number of goals and policies to reduce reliance on automobiles which would reduce mobile source emissions including:

Goal 7.1-G-1: Develop street typology based on functional and urban design considerations, emphasizing connections and linkages, pedestrian and cyclist comfort, transit movement and compatibility with adjacent uses.

Goal 7.5-G-1: Encourage transportation demand management strategies to minimize traffic contributions from new and existing development.

Policy 7.5-P-1: Encourage TDM approaches for various SANDAG programs including:

- Rideshare and carpool in all levels of government with offices and facilities downtown as well as other major downtown employers.
- Make available designated preferential, conveniently located car/vanpool parking areas.
- Provide transit reimbursement and other benefits to other users of non-motorized travel.
- Establish a car/vanpool matching service that could use mechanisms such as sign-ups at individual buildings, or via electronic mail or internet website.
- Continue SANDAG’s guaranteed ride home for workers who carpool.

- Work with public and private entities to encourage car share programs in downtown.
- Provide flextime and telecommuting opportunities to employees.

Stationary Source Emissions

In general, stationary sources of emissions would be expected to remain constant or be reduced due to the fact that the proposed Plan would not encourage the establishment of new major sources. Existing major sources such as the Tenth Avenue Marine Terminal, railroad operations and the cruise ship terminal would be expected to continue to operate within downtown. However, small manufacturing sources of emissions (e.g. chrome-plating) would be expected to be eliminated as development occurs. The only notable increase in stationary source emissions would occur with respect to ROG emissions related to increased residential use of ROG-producing products such as personal care products (e.g. hair sprays and deodorants, household cleaning products, and landscape maintenance equipment).

Buildout of the proposed Community Plan would increase the number of people located near stationary sources occurring within and/or adjacent to the downtown area. Although major new stationary sources of substantial levels of air emissions would not be anticipated, several existing stationary sources are expected to continue to occur within or adjacent to downtown. Major stationary sources which are expected to continue include: Tenth Avenue Marine Terminal, railroad operations, cruise ship terminal, small commercial sources including dry cleaners and gas stations, as well as industrial and manufacturing uses including chrome-plating. The primary hazardous pollutant of concern is DPM generated by diesel engines, but other hazardous airborne compounds such as benzene (gas stations), chrome (plating shops), perchloroethylene (dry cleaners) or other toxic air contaminants (TACs) may be present.

There are no adopted standards for evaluating the potential risk to sensitive receptors located in proximity to stationary-source emissions. This is largely due to the variables involved in predicting the effect of emissions on nearby receivers. The variability in meteorological conditions is largely responsible for the difficulty associated with predicting the influence of emissions. Prevailing winds may result in emissions blowing toward or away depending on where the receiver is located. Air moisture may also affect dispersal.

Recently, the California Air Resources Board (CARB) released guidelines intended to help local agencies address the relationship between common stationary source emission generators and sensitive receptors (California Air Resources Board, 2005). The guidelines are heavily based on the impacts related to diesel-powered equipment due to the risk associated with DPM. In the introduction to the guidelines, CARB emphasizes that the guidelines are “advisory and should not be interpreted as defined “buffer zones.” The influence of meteorological conditions is recognized as a strong influence. The CARB further acknowledges that other important considerations must be considered in the land use process, including housing and transportation needs, community economic development priorities and other quality of life issues, and that the recommendations in the guidelines “need to be balanced with other State and local policies.” Further, the guidelines “recognize the opportunity for more detailed site-specific analysis always exists, and that there is no “one size fits all” solution to land use planning.” In light of these qualifiers, the following setbacks are identified in the CARB guidelines:

- 500 feet from any freeway;
- 1,000 feet from any major rail yard or chrome plating operation;
- 1,000 feet from any distribution center with more than 100 trucks per day;
- Immediately downwind of a port or petroleum refinery; and
- 300 feet from any dry cleaning operation or large gas station.

A review of the proposed Community Plan indicates that new residential and other sensitive receptors would be expected to develop near to the types of emission generators identified above. While some would likely occur within the distances identified by the CARB guidelines, as indicated earlier, the potential for a health risk would be dependent on the intensity of the emission generation and the relationship of a particular receptor in terms of distance and meteorological factors. In addition, it is important to note that long-term exposure is often required to create a significant health risk. For example, as discussed earlier in the case of DPM, the exposure standard is based on a person being exposed continuously over a period of 70 years.

Implementation of the proposed Community Plan would not increase the health risk to existing sensitive receptors in downtown or surrounding neighborhoods. While existing major stationary sources would continue, no major new sources would be encouraged by the Community Plan. Furthermore, with the possible exception of trolley operations, existing stationary sources would not intensify as a direct result of implementation of the proposed plan. Operations in the Tenth Avenue Marine Terminal are a function of regional demand for goods delivered by ship. Similarly, operations at the cruise ship terminal are a function of the regional tourist industry. Rail operations would continue through downtown and within the switching yard regardless of the proposed Plan. Although the increased development intensity would be expected to increase trolley activity, the trolley operates on electricity which creates minimal local emissions. High traffic volume on I-5 would continue to affect nearby sensitive receptors whether or not the proposed plan is implemented. Existing manufacturing activities associated with emissions (e.g. chrome-plating) would be anticipated to diminish with development within East Village. Lastly, dry cleaners and gas stations already occur in downtown and the mixed use philosophy of the proposed Plan would likely result in additional dry cleaners and service stations in close proximity to sensitive receptors.

5.8.4 MITIGATION MEASURES

Impact AQ-B.1 Construction Emissions

Mitigation Measure AQ-B.1-1 Prior to approval of a Development Permit which may involve grading and/or building demolition, ~~CCDC~~ the City shall confirm that the following conditions have been applied, as appropriate:

1. Exposed soil areas shall be watered twice per day. On windy days or when fugitive dust can be observed leaving the development site, additional applications of water shall be applied as necessary to prevent visible dust plumes from leaving the development site. When wind velocities are forecast to exceed 25 miles per hour, all ground disturbing activities shall be halted until winds that are forecast to abate below this threshold.

2. Dust suppression techniques shall be implemented including, but not limited to, the following:
 - a. Portions of the construction site to remain inactive longer than a period of three months shall be seeded and watered until grass cover is grown or otherwise stabilized in a manner acceptable to the CCDC.
 - b. On-site access points shall be paved as soon as feasible or watered periodically or ~~chemically~~ otherwise stabilized.
 - c. Material transported offsite shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
 - d. The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times.
3. Vehicles on the construction site shall travel at speeds less than 15 miles per hour.
4. Material stockpiles subject to wind erosion during construction activities, which will not be utilized within three days, shall be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer.
5. Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface. Any visible track-out extending for more than fifty (50) feet from the access point shall be swept or washed within thirty (30) minutes of deposition.
6. All diesel-powered vehicles and equipment shall be properly operated and maintained.
7. All diesel-powered vehicles and gasoline-powered equipment shall be turned off when not in use for more than five minutes, as required by state law.
8. The construction contractor shall utilize electric or natural gas-powered equipment in lieu of gasoline or diesel-powered engines, where feasible.
9. As much as possible, the construction contractor shall time the construction activities so as not to interfere with peak hour traffic. In order to minimize obstruction of through traffic lanes adjacent to the site, a flag-person shall be retained to maintain safety adjacent to existing roadways, if necessary.
10. The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew.
11. Low VOC coatings shall be used as required by SDAPCD Rule 67. Spray equipment with high transfer efficiency, such as the high volume-low pressure (HPLV) spray method, or manual coatings application such as paint brush hand roller, trowel, spatula, dauber, rag, or sponge, shall be used to reduce VOC emissions, where ~~practical~~ feasible.

12. If construction equipment powered by alternative fuel sources (LPG/CNG) is available at comparable cost, the developer shall specify that such equipment be used during all construction activities on the development site.
13. The developer shall require the use of particulate filters on diesel construction equipment if use of such filters is demonstrated to be cost-competitive for use on this development.
14. During demolition activities, safety measures as required by City/County/State for removal of toxic or hazardous materials shall be utilized.
15. Rubble piles shall be maintained in a damp state to minimize dust generation.
16. During finish work, low-VOC paints and efficient transfer systems ~~should~~shall be utilized, to the extent feasible.
17. If alternative fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible.

5.8.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impact AQ-B.1 Construction Emissions

Level of Significance After Mitigation: Not Significant

Implementation of standard dust controls mandated by the City of San Diego as well as implementation of dust control measures required under Mitigation Measure AQ-B.1-1 would keep construction dust to within acceptable levels.

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5.9 HYDROLOGY/WATER QUALITY

5.9.1 EXISTING CONDITIONS

5.9.1.1 Surface Water

The following discussion is based largely on the San Diego Bay Watershed Urban Runoff Management Program Document prepared by the City of Chula Vista, City of Coronado, City of Imperial Beach, City of La Mesa, City of Lemon Grove, City of National City, City of San Diego, County of San Diego, and the Port of San Diego in January 2003 and the Storm Water Quality Technical Report for CCDC in the City of San Diego, California prepared by Rick Engineering Company in October 2002.

The downtown planning area is located within the San Diego Bay watershed. The San Diego Bay watershed encompasses a 415 square-mile area that extends easterly from the San Diego Bay to the Laguna Mountains over 50 miles away to the east. The majority of the watershed land area generally lies north of the border with Mexico and south of Interstate 8. Watercourses feeding San Diego Bay include the Sweetwater River, the Otay River, Chollas Creek, Paleta Creek, Paradise Creek, and Switzer Creek.

On a smaller scale, the downtown planning area lies within the Pueblo San Diego sub-watershed, one of the San Diego Bay watershed's three sub-watersheds (Figure 5.9-1). The Pueblo San Diego is the smallest of the three sub-watersheds, encompassing an area of 60 square miles. In addition, the Pueblo San Diego sub-watershed has no central stream system. As such, there are no surface watercourses within the downtown planning area. Pueblo San Diego is the most developed and most densely populated sub-watershed in the San Diego Bay watershed. Ninety-two percent of the land uses within the Pueblo San Diego sub-watershed area is urban in character, and 53% of the land area is residential. The population within the sub-watershed is expected to reach over 577,000 by the year 2020. This translates to a density of 9,600 people per square mile within the sub-watershed.

The major water feature adjacent to the downtown planning area is the San Diego Bay. San Diego Bay is the largest estuary in San Diego County and has been extensively developed as a port. Only 17 to 18% of the original Bay floor remains undisturbed by dredge or fill. Dams and extensive use of groundwater in the Sweetwater and Otay Rivers have reduced hydrologic input to the Bay by 76%. Therefore, the majority of freshwater input to the Bay is from urban runoff from developed areas and intermittent flow from rivers and creeks during rain events. There are over 200 storm drains that discharge into San Diego Bay.

Beneficial uses of the Bay include industrial service supply, navigation, contact and non-contact water recreation, commercial and sport fishing, shellfish harvesting, and several biological habitats. Constituents of concern in the San Diego Bay watershed include copper, zinc, diazinon (a pesticide), bacteria, and turbidity/total suspended solids. Other potential constituents of concern that may present high priority water quality issues in the future include lead, nitrogen, and trash.

The existing quality of urban runoff in the downtown planning area is similar to typical urban runoff. Typical pollutants found in urban runoff include metals, sediments, pesticides, hydrocarbons,

nutrients (phosphates and nitrates), surfactants, bacteria, and pathogens. Runoff is currently conveyed through the City of San Diego stormwater system to outfalls that discharge into San Diego Bay.

5.9.1.2 Groundwater

In general, groundwater is encountered a few feet above mean sea level in the downtown planning area. Groundwater is not designated as having current or potential beneficial use in the San Diego Basin Plan and is exempt from municipal use. Although the pollutants in downtown's groundwater have not been fully characterized, site investigations performed downtown have identified such pollutants as petroleum products and solvents. For further discussion of groundwater in the downtown planning area, refer to Chapter 5.5.1.1.

5.9.1.3 Storm Drain System

The majority of the downtown land area (over 97%) is developed, leaving very little vacant land where rainwater and urban runoff can percolate into the soil. The storm drain collection system, therefore, has become the primary mechanism for collecting, transporting, and discharging downtown's urban storm water runoff. The storm drain collection system within the downtown planning area, depicted in Figure 5.9-2, directs storm water runoff via the curb and gutter system to storm drain inlets. Some inlets connect to reinforced concrete pipes (RCPs); some connect to reinforced concrete boxes (RCBs). The RCPs normally range from 12" to 72" in diameter and the RCBs normally range from 4.5' x 6' to 9' x 6'. Also, there are many inlets downtown that connect to 8" x 10" to 10" x 24" boxes; they take water from one street to another, discharging around corners or across streets. These boxes alleviate the need for cross gutters and make the corners safer and more user friendly for pedestrian traffic. Storm water is discharged into San Diego Bay through both RCPs and RCBs at 21 outfall locations along the waterfront within the downtown planning area. The majority of the storm drains are located within the streets.

The City of San Diego General Services Department maintains a Storm Drains Needs List to prioritize areas within the storm drain system that need replacement or upgrade. In the downtown planning area, there are four known places where storm drains require physical improvement (refer to Figure 5.9-2). There is need for a new box culvert at B Street at Pacific Highway, new underdrains at the India Street/Grape Street and India Street/Hawthorn Street intersections, and an upgrade to a larger drain at Pacific Highway and Ivy Street.

5.9.1.4 Relevant Ordinances and Regulations

A number of laws, general policies, and regulations govern hydrology and water quality factors associated with the proposed Downtown Community Plan. This regulatory framework also provides the guidelines and management practices to avoid, minimize, or mitigate adverse impacts to these resources. A brief description of these regulations is provided below.



Source: SANGIS, 1/2005

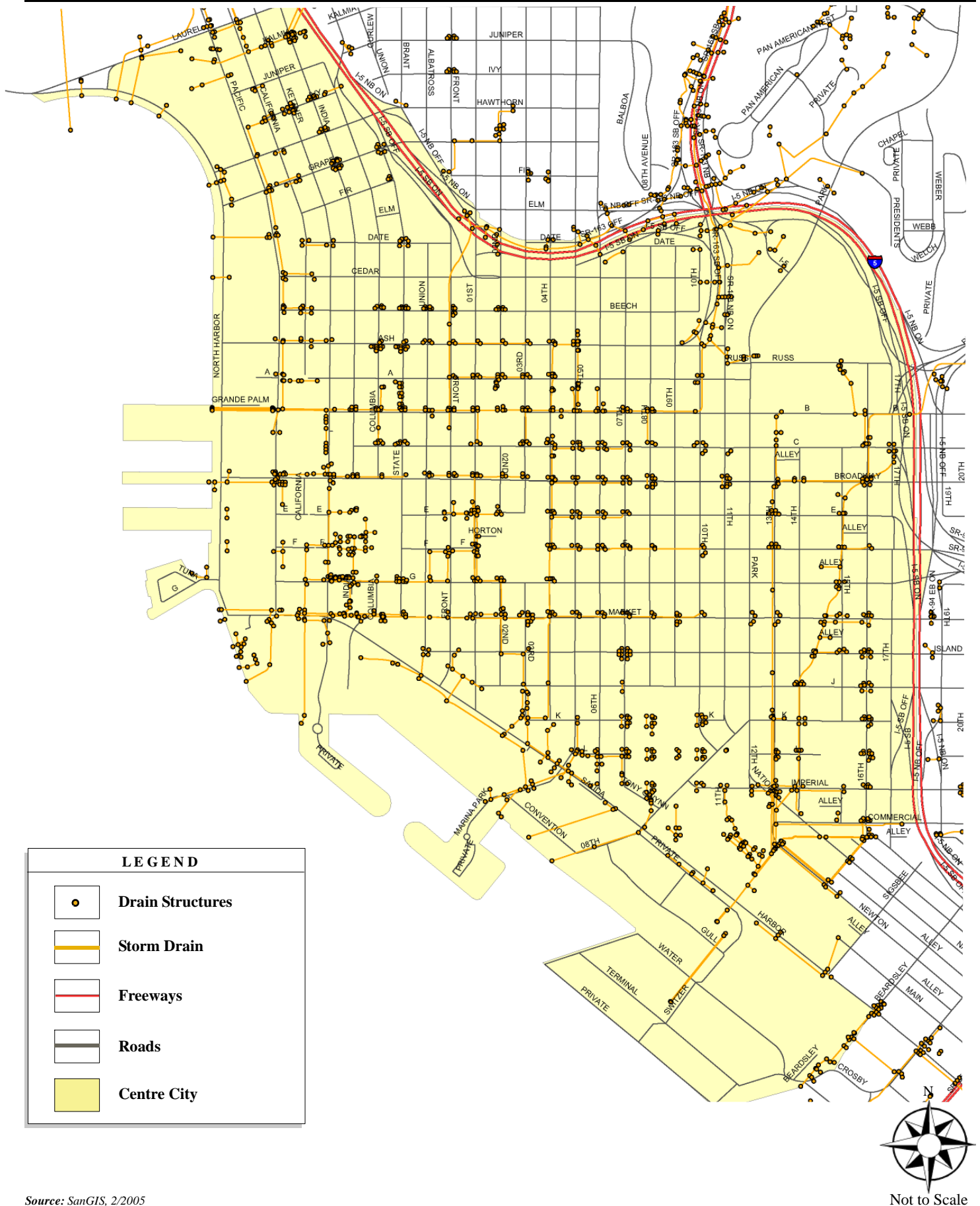


Not to Scale

San Diego Bay Sub-Watersheds

Figure 5.9-1

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Source: SanGIS, 2/2005

Downtown Storm Drain System

Figure 5.9-2

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Federal

Federal Clean Water Act of 1972 (33 U.S. C. 1251 et seq.)

This is the basic federal law dealing with surface water quality control and protection of beneficial uses of water. The basis for the state and local controls is Section 402(p) of the federal Clean Water Act (CWA). The CWA establishes a framework for regulating storm water discharges from municipal, industrial, and construction activities under the NPDES. Under the CWA, municipalities across the nation are issued Municipal NPDES permits. In California, the State Water Resources Control Board (SWRCB) administers the NPDES program.

State

Porter-Cologne Water Quality Control Act of 1969 (Division 7 of the 1969 California Water Code)

This act mandates that the waters of the State shall be protected such that activities that may affect waters of the State shall be regulated to attain the highest quality.

Water Quality Management Policy of the Regional Water Quality Control Board (RWQCB)

This policy, stated in the Water Quality Control Plan for the San Diego Basin (9) (RWQCB 1994), consists of the following five statements:

- Policy One: Water quality objectives, beneficial uses, and water quality control plans and policies adopted by the State Water Resources Control Board and the Regional Water Quality Control Board shall be an integral part of the basis for water quality management.
- Policy Two: Water shall be reclaimed and reused to the maximum extent feasible.
- Policy Three: Point sources and nonpoint sources of pollution shall be controlled to protect designated beneficial uses of water.
- Policy Four: Instream beneficial uses shall be maintained, and when practical, restored, and enhanced.
- Policy Five: A detailed and comprehensive knowledge of the beneficial uses, water quality and activities affecting water quality throughout the Region shall be maintained.

In October 2002, the RWQCB approved Order 2001-01 (NPDES No. CAS0108758) which specifies requirements for 20 co-permittees in San Diego County (including the City of San Diego) to ensure water quality within their respective jurisdictions. Order No. 2001-01 requires the co-permittees to comply with a number of provisions.

Co-permittees are required to prohibit discharges into storm drains which would:

- Cause or threaten to cause pollution, contamination or nuisance;
- Cause or contribute to exceedances of receiving water quality objectives; and
- Result in discharges which have not been reduced to the maximum extent possible.

The Order prohibits all types of non-storm water discharges into a storm drain system.

Each co-permittee is required to develop and implement its own plan for water quality management referred to as a Jurisdiction Urban Runoff Management Plan (JURMP). The plan is required to have the following components:

- Land Use Planning for New Development and Redevelopment;
- Construction;
- Existing Development;
- Education;
- Illicit Discharge Detection and Elimination;
- Public Participation;
- Assessment of JURMP Effectiveness; and
- Fiscal Analysis.

The RWQCB Water Quality Control Plan, also called the “Basin Plan,” sets forth water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. The following beneficial uses are designated for San Diego Bay in the San Diego RWQCB Basin Plan:

Industrial Service Supply (IND)	Estuarine Habitat (EST)
Navigation (NAV)	Wildlife Habitat (WILD)
Contact Water Recreation (REC-1)	Shellfish Harvesting (SHELL)
Non-contact Water Recreation (REC-2)	Marine Habitat (MAR)
Commercial and Sport Fishing (COMM)	Migration of Aquatic Systems Preservation of (MIGR)
Biological Habitats of Special Significance (BIOL)	Rare, Threatened, or Endangered Species (RARE)
Spawning, Reproduction, and/or Early Development (SPWN)	

Construction Dewatering

Construction dewatering discharges must be permitted either by the San Diego RWQCB under an NPDES general permit for construction dewatering discharge to surface waters or by the City of San Diego Metropolitan Wastewater Department for discharge into the city sanitary sewer under the Industrial Waste Pretreatment Program. Discharge via either of these mechanisms must meet applicable water quality objectives, constituent limitations, and pre-treatment requirements.

Local

The City of San Diego regulates water quality through a variety of ordinances and guidelines. Construction pollutant sources are regulated by the Municipal Code. Sections 62.0401 through 62.0423 of the Municipal Code require the City to review and approve grading plans. Grading plans

are required to include procedures to control erosion and minimize sediment runoff draining from land undergoing development.

Sections 43.0301 through 43.0311 of the Municipal Code require future development to adhere to the various state and federal regulations which govern water quality and in particular, Order No. 2001-01 of the San Diego Regional Water Quality Control Board. These sections of the Municipal Code reinforce the need for development to implement appropriate best management practices (BMPs) to limit contributions of pollutants. Section 43.0308 outlines requirements related to business activities such as preparation of a Storm Water Pollution Prevention Plan (SWPPP) and a Hazardous Materials Release Response and Inventory Plan, as required under Chapter 6.95 of the California Health and Safety Code. Section 43.0308 of the Municipal Code also requires project compliance with NPDES permitting for storm water discharges and general construction activities; regular cleaning or sweeping of parking lots and impervious areas; and compliance with storm water BMPs.

In accordance with the provisions of Order 2001-01, the City of San Diego adopted the Land Development Manual including Storm Water Standards as the City's local Standard Urban Storm Water Mitigation Plan (SUSMP). The Storm Water Standards identify mitigation strategies required to protect storm water quality for development and new development within the City of San Diego. Development within the Downtown Community Plan area is subject to the City's SUSMP requirements.

The City's Storm Water Standards establishes a series of standard permanent BMPs which are to be implemented by new development. In addition, more requirements are identified for specific types of development projects, referred to as priority projects. Priority projects include residential, commercial (greater than 100,000 square feet), automotive repair, restaurants, parking lots and streets.

Permanent BMPs are intended to be implemented in the following progression:

- Site Design;
- Source Control; and
- Treatment Control.

Site design BMPs are intended to maintain or reduce post-project runoff to conditions as similar to pre-development conditions as feasible. Design techniques include minimizing impervious areas, conserving natural areas, and landscaping.

Source control BMPs include proper storage of hazardous materials, trash controls, Integrated Pest Management, efficient landscape and irrigation design, and education such as storm drain stenciling and signage. Priority projects are required to implement appropriate source controls including equipping streets and parking areas with inlet filters or natural swales, permeable paving, and covering activities associated with potential pollutants (e.g. loading docks and vehicle maintenance areas).

Treatment control BMPs are intended to be applied only after site design and source control BMPs have been incorporated into development. Priority projects are required to design a single or combination of treatment control BMPs to infiltrate, filter and/or otherwise treat project runoff. The treatment must be designed to meet numeric sizing treatment standards which require treatment of runoff resulting from an 85th percentile storm event which represents approximately the first 0.6 inch of rain. Treatment control measures may include biofilters, detention basins, infiltration basins, ponds, drainage inserts, filtration and hydrodynamic separator systems.

Standards are also established for short-term construction BMPs to control water quality including:

- Perimeter protection BMPs;
- Sediment control and sediment control tracking BMPs;
- Standby BMP materials;
- “Weather Triggered” action plan (40 percent chance of rain);
- Physical or vegetation erosion control BMPs as soon as grading/excavation is completed;
- Limiting area being cleared or graded to amount that can be adequately protected;
- Washout area;
- Storage areas for materials and wastes;
- Remnant trash and debris shall be removed or stored daily;
- Storage, service, cleaning and maintenance area for vehicles identified and protected;
- Onsite materials for spill control/containment;
- Non-storm water discharge must be eliminated or controlled;
- Erosion control BMPs must be upgraded for storms within rainy season;
- Physical or vegetation erosion control BMPs must be installed prior to rainy season and maintained throughout season;
- Vegetation erosion control must be established prior to rainy season to be considered a BMP;
- Limiting area of exposed soil to amount that can be adequately protected; and
- Disturbed area not completed and not being actively graded must be fully protected if left for seven or more calendar days.

Erosion control BMPs include physical stabilization (e.g. geotextiles, mats, and mulch) and vegetation stabilization (e.g. retaining existing vegetation and establishing interim vegetation). Silt control BMPs include silt fencing, gravel bags, fiber rolls, de-silting basins, and energy dissipaters. Materials management BMPs relate to proper materials and equipment storage.

5.9.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse, environmental impact related to hydrology, or water quality if the goals, policies, objectives or regulations established by the planning credentials and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion HYD-A	Result in a substantial increase in impervious surfaces and associated increased runoff;
Significance Criterion HYD-B	Result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes;
Significance Criterion HYD-C	Impede or redirect flood flows within a 100-year flood hazard area;
Significance Criterion WQ-A	Substantially degrade the quality of groundwater and surface water;
Significance Criterion WQ-B	Result in a substantial increase in erosion and sedimentation; or
Significance Criterion WQ-C	Violate federal, state, or regional water quality standards or waste discharge requirements.

5.9.3 ENVIRONMENTAL IMPACTS

5.9.3.1 Substantially increase impervious surfaces and associated runoff (HYD-A)

Surface Water Hydrology

Implementation of the Downtown Community Plan would not result in a substantial increase in impervious surfaces within the downtown planning area. The proposed mix of uses is anticipated to replace the impervious surfaces that already exist in the area. This would maintain existing general runoff characteristics. For example, a redevelopment activity that changes the use of a site from a surface parking lot to a high-rise office building would not substantially change the runoff characteristics of the site. Although the use would be different, the impermeable surface area would not change because the impervious surface of the parking lot would be replaced by the impervious surface of the building roof. As a result, the amount of runoff entering the storm drain system would not be substantially different with the land use change. As the downtown planning area is highly urbanized, paved with impervious surfaces, and contains very little vacant land (approximately 3% of the planning area), redevelopment within downtown under the proposed Plan would not result in a substantial increase in impervious surface area. Therefore, the storm drain system would not be significantly impacted.

The Downtown Community Plan may in fact result in a decrease in impervious surfaces as park land would increase from 79 acres to 131 acres at buildout. The parks would absorb more rainfall than developed areas, which would serve to reduce the overall volume of runoff.

In addition, Policy 5.8-P-6 would result in the reduction of impervious surfaces downtown. It states, “In new development and re-use projects alike, encourage use of low impact development principles such as eco-roofs, roof gardens, landscaped courtyards, grass filter strips, permeable pavement, and rainwater systems, to reduce surface runoff volumes and pollutants as well as reduce heat island effect.” ~~Section 103.1907(e)(4) of the~~ The proposed PDO would grant a FAR bonus ~~of 1.0~~ to redevelopment activities that incorporate a green or eco-roof. Furthermore, Planned District ~~Ordinance Section 103.1908(g)(1)(A)~~ requires at least 25% of the lot area of new residential developments to be provided as common open space. At least 30% of the open space common area must be permeable. These strategies would capture roof runoff and reduce the volume and flow rate as it enters the storm drain system.

5.9.3.2 Substantially alter on- and off-site drainage patterns due to changes in runoff flow rates or volumes (HYD-B)

As stated previously, the downtown planning area is highly urbanized, paved with impervious surfaces, and contains very little vacant land. The hydrology of the downtown planning area would not be substantially altered, as the Downtown Community Plan would propose land uses that would maintain the existing quantity of impervious surfaces and, therefore, general runoff characteristics. In addition, the Downtown Community Plan does not propose substantial changes to the topography of the area to result in increases to runoff flow rates. In fact, the Downtown Community Plan proposes an increase in park land and promotes the development of green roofs, which would increase permeable areas and result in the reduction of overall flow rates and volumes of urban runoff. Therefore, the impact would be less than significant.

5.9.3.3 Impede or redirect flows within a 100-year flood hazard area (HYD-C)

With respect to flood flows, the proposed Downtown Community Plan would have no impact on a 100-year flood hazard area as none of these areas exist within downtown.

5.9.3.4 Surface Water and Groundwater Quality (WQ-A)

With adherence to state and local water quality controls discussed earlier (e.g. JURMP, SUSMP, SWPPP, City Stormwater Standards, and Hazardous Materials Release Response and Inventory Plan) the contribution to urban runoff generated by new development would be reduced to below a level of significance. Best Management Practices (BMPs) required as part of the SWPPP would prevent significant water quality impacts during construction. Long-term BMPs required by the SUSMP and Stormwater Standards would similarly protect against long-term significant water quality impacts from future development. Waste Discharge Permits required for groundwater discharge during construction would avoid significant water quality impacts from this process.

Improper storage of hazardous materials and improper disposal of waste materials would be avoided through the Hazardous Materials Release Response and Inventory Plan required for new development within downtown.

The Planned District Ordinance includes in ~~Section 103.1908(g)(3)~~ a requirement for new residential developments to improve 100 square feet for use by pets. This requirement would help limit pet waste from entering the storm drain system.

5.9.3.5 Substantially increase erosion and sedimentation (WBF-B)

As indicated above, the preparation and implementation of the SWPPPs mandated for all new development would reduce erosion and sedimentation impacts to below a level of significance.

5.9.3.6 Consistency with Water Quality Standards and Discharge Requirements (WQ-C)

Federal

The municipal NPDES stormwater permit for San Diego helps to improve water quality in the San Diego Bay. The Downtown Community Plan would not contain policies or goals to undermine the efficacy of this program and stormwater permit regulations would continue to be implemented downtown. Therefore, there would be no conflict with the NPDES stormwater permit for San Diego.

State

RWQCB Water Quality Control Plan “Basin Plan”

The Downtown Community Plan would implement goals and policies to reduce the amount of urban storm water runoff entering the Bay and also improve the quality of storm water as it enters the storm drain system. The Downtown Community Plan would not contain goals or policies to undermine the efficacy of the Basin Plan. Therefore, there would be no conflict with the goals of the Basin Plan for maintaining water quality.

Construction Dewatering

Redevelopment activities involving groundwater dewatering would be required to obtain an NPDES general permit (for discharge to the Bay) or a permit from the Metropolitan Wastewater Department (for discharge into the sanitary sewer). Obtaining this permit would assure that construction dewatering would not significantly impact water quality.

Local

Grading and Erosion Control

Redevelopment activities pursuant to the Downtown Community Plan would be required to comply with grading and land development regulations, including Municipal Code Sections 62.0401 through 62.0423.

Reduction of Pollutants in Stormwater

Redevelopment activities resulting from the Downtown Community Plan would also be required to comply with stormwater pollution reduction regulations as set forth in Municipal Code Section 43.0301 through 43.0308 and the California Health and Safety Code Chapter 6.95. Adherence to the City's Development Manual Stormwater Standards would also reduce impacts to stormwater quality.

General Construction Activity Stormwater Permit

Redevelopment activities resulting from the Downtown Community Plan that would disturb more than five acres of land would be required to obtain a General Construction Activity Stormwater Permit. The development and implementation of a Stormwater Pollution Prevention Plan would also be required.

5.9.4 MITIGATION MEASURES

Adherence to existing state and local regulations governing the release of pollutants into surface waters would provide sufficient protection against significant water quality impacts. No further mitigation measures would be required.

5.9.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

No significant hydrology or water quality impacts would occur with approval of the proposed Plans and Ordinances as well as subsequent development in accordance with these Plans and Ordinances.

5.10 HAZARDOUS MATERIALS

5.10.1 EXISTING CONDITIONS

5.10.1.1 Hazardous Materials

The following discussion is intended to provide general information on the potential for hazardous materials sites within the downtown planning area as well as the current regulatory framework managing hazardous materials risk. Inspection of individual properties was not conducted for this EIR, but would be required in the course of any project-specific environmental review. The discussion incorporates by reference the 1992 Master Environmental Impact Report for the Centre City Redevelopment Project, the Final Hazardous Materials Assessment for the Centre City Redevelopment Project (January 1992), and the Final Subsequent Environmental Impact Report for the Proposed Ballpark and Ancillary Development Projects and Associated Plan Amendments (October 1999).

Contaminated Sites

Hazardous materials are any materials that, because of their quantity, concentration, or physical and chemical characteristics, pose a significant present or potential hazard to human health and safety or the environment. Within the downtown planning area, there are historic and existing land uses that have generated hazardous waste as part of daily business operations. Large- and small-quantity generators of hazardous materials include such commercial uses as painters, dry cleaners, photographers, etc. and industrial uses such as automotive service stations, sheet metal works, metal scrap yards, truck yards, cement and lime warehouses, coal yards, battery manufacture, and SDG&E substations. In addition, older structures may contain building materials that are considered hazardous, such as asbestos and lead-based paint. In general, these historic and current uses and building materials are located throughout the planning area.

The Hazardous Waste and Substances Sites (Cortese) List and the County of San Diego's Site Assessment Mitigation (SAM) Case Listing are used by the State and local agencies as a source of information about the location of hazardous release sites. Government Code section 65962.5 requires the California Environmental Protection Agency to update the Cortese List on an annual basis. There is one Cortese List hazardous waste site in the downtown planning area, called the Tow Basin Facility, which is located at 3380 North Harbor Drive. The site was once used to conduct tests of the hydrodynamic designs of boats, ships, submersible vehicles, and seaplanes and was found to be contaminated with PCBs.

Regulatory Background

Hazardous materials handling and hazardous waste management are the subject of many laws and regulations. A brief summary of the primary regulations follows.

Worker Safety

Occupational safety standards are defined in federal and state laws to minimize safety risks to workers from chemical hazards. The California Division of Occupational Safety and Health

Administration (Cal-OSHA) and the federal Occupational Safety and Health Administration (OSHA) are primarily responsible for enforcing these standards. A Site Health and Safety Plan for the workers within the “exclusion zone” is required pursuant to the regulations in 29 Code of Regulations (CFR) Part 1910.120, and Title 8 California Code of Regulations, Section 5192 (et. seq.).

Hazardous Waste Handling

The California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage and disposal of hazardous waste under the federal Resources Conservation and Recovery Act (RCRA) and the California Hazardous Waste Control Law. Both laws impose regulatory systems for handling hazardous wastes including requiring that wastes be disposed of in licensed facilities. Permits are required by DTSC for all hazardous waste treatment or long-term storage (over 90 days) and disposal activities.

In San Diego, remediation and clean up of most contaminated sites is performed under the supervision of the County of San Diego Department of Environmental Health (DEH). Various state agencies can also supervise these activities, but DEH will be the coordinating agency in the area. The DEH approves remediation activities aimed at eliminating health risks posed by contaminated sites. Implementation of approved remediation must occur before construction activities may proceed.

Hazardous Materials Transportation

Transportation of hazardous materials is regulated by the federal Department of Transportation if the materials are transported inter-state. Intra-state transportation is regulated by the California Highway Patrol and California Department of Transportation. Together, these agencies determine the container types to be used and license hazardous waste haulers.

Hazardous Building Materials

Federal and state laws regulate handling of building materials which contain hazardous materials (e.g., asbestos and lead-based paint). Asbestos-containing materials are regulated as a hazardous air pollutant under the Clean Air Act, and by Cal-OSHA. These regulations limit emissions of asbestos from manufacturing, demolition or construction activities. They require monitoring of employee health conditions. Specific precautions and work practices are required for activities involving asbestos. The San Diego Air Pollution Control District, through the authority of CARB and Cal-EPA, are primarily responsible for enforcing asbestos regulations.

Both OSHA and Cal-OSHA enforce regulations for handling building materials which contain lead-based paint to assure that exposure does not exceed specific standards established by state and federal regulations.

Storage of Hazardous Materials

Hazardous material storage is regulated by the City of San Diego Fire Code (City of San Diego Municipal Code Sections 55.0101 through 55.9201). The San Diego Fire Code has adopted provisions of the Uniform Fire Code with respect to storage requirements for hazardous materials.

In accordance with Section 8003 of the UFC (1994), secondary containment is required for the storage of solid and liquid hazardous materials.

5.10.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to public health and safety if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

- Significance Criterion HAZ-A** Result in significant public health risks due to hazardous emissions or the handling of hazardous or acutely hazardous materials;
- Significance Criterion HAZ-B** Be located on or within 2,000 feet of a site which is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5; or
- Significance Criterion HAZ-C** Substantially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

5.10.3 ENVIRONMENTAL IMPACTS

5.10.3.1 Potential Health Risks from Handling or Emitting Hazardous Materials (HAZ-A)

Hazardous materials which occur within the downtown planning area pose significant public health and safety risks during construction or long-term use of proposed development if they occur in concentrations that exceed state and/or federal standards. Exposure to hazardous materials can occur through contact with contaminated soil or groundwater through ingestion, skin contact or the inhalation of vapors or dust.

During construction, workers may come in contact with hazardous or potentially hazardous materials during demolition of buildings or excavation activities. Demolition of buildings may expose workers to asbestos and lead paint as well as chemicals stored in or leaking from underground storage tanks. Inhalation of friable asbestos fibers can cause lung cancer and asbestosis. Similarly, inhalation of lead-containing dust may cause acute or chronic toxicity. Exposure to persons other than construction workers would be minimized by the exclusion of non-authorized personnel in areas determined to contain hazardous or potentially hazardous materials.

Excavation would disturb soils and possibly cause contaminants to become airborne. Excavation below the groundwater table or dewatering could also bring construction workers in contact with contaminants. Exposure may occur from skin contact, ingestion or inhalation.

The types of hazardous materials occurring within the downtown planning area are not likely to occur in sufficient concentrations to represent significant carcinogenic or non-carcinogenic risks to

construction workers. The potential does exist that construction workers could encounter hazardous materials in buried drums or underground storage tanks. However, property-specific Phase II Environmental Assessments required prior to development would identify areas most likely to contain such materials prior to construction, enabling appropriate actions to be taken to control risk exposure.

The first phase of construction of an individual redevelopment activity would involve carrying out remedial measures necessary to remove or clean contaminated buildings, soil or groundwater, as necessary. As with excavation, remedial measures which disturb contaminated buildings, soil or groundwater have the potential to expose construction workers to hazardous material via contact, ingestion or inhalation. Additionally, trucks transporting materials offsite could potentially impact residents, employees, and motor vehicle operators on the route traveled. All remediation activities are anticipated to take place prior to construction; however, it is possible that additional contamination may be encountered during construction.

Although it is not likely, it is possible that after construction is complete, residual soil and groundwater contaminants could pose a health and safety risk to downtown's residents, employees, and visitors. The risk of exposure would be greatly reduced as the chances of encountering groundwater would be low and the majority of the soil would be covered by structures or pavement.

In addition to risks posed by pre-existing hazardous materials, potential risks are associated with the individual redevelopment activities themselves. Herbicides and fertilizers associated with the landscaping of a redevelopment activity have the potential to pose a health risk if not properly managed. Similarly, proposed retail, office, and hotel uses may also involve the use or storage of materials which may be considered hazardous if not properly managed. These risks would be managed to a level below significant through the implementation of existing mandatory federal, state, and local regulations described below.

Applicable Rules, Regulations and Remedial Measures

The potential health risks during and after construction of individual redevelopment activities located on a site with hazardous materials remediation needs would be reduced through the mandatory controls imposed by State and Federal regulations described in 5.10.1.1. In accordance with these laws and regulations, all hazardous materials/wastes and petroleum products will have to be removed and remediated prior to, or during construction, to the standards set by the various federal, state, and local regulations. The type and extent of the remediation activities would be tailored to the individual properties based on the amount of hazardous materials/wastes and petroleum products identified by subsequent site-specific Phase I and II Environmental Assessments, and the planned land uses to be constructed on the site.

Although specific remediation activities have not been determined for future individual redevelopment activities within the downtown planning area, proven soil remediation technologies are described in the following paragraphs. Not all remediation activities would be conducted at all sites. Both soils containing no measurable contaminants and soils containing contaminants at concentrations below the remediation goals and not classified as hazardous by Title 22 of the California Code of Regulations may be used as backfill on future activity sites.

No Action

Based on the nature, concentration, and distribution of the contaminant, distance to potential receptors (including groundwater and San Diego Bay), and the intended site land use, the DEH may not require any soil or groundwater remediation activities to occur.

Soil Remediation

If the contaminants in soil are judged to pose a potential unacceptable risk to human health or the environment, the DEH will likely require remedial activities to take place to reduce the potential risk. Typically, the soil is remediated either in place (*in situ*), or after it has been excavated (*ex situ*). The following is a summary of the methods that may be used to treat soil in the downtown planning area.

In situ Methods

In many cases, it is possible to remediate soil without having to excavate the soil. Although there are several *in situ* methods available, the two most common ones are vapor extraction and air sparging.

Natural Attenuation. This method allows contaminated soils or groundwater to remain in place when the DEH concurs that a contaminant plume is stable (e.g., not migrating) and the concentrations of the contaminant have been shown to be decreasing over time. In most cases, the method is used for residual contamination remaining in the subsurface after other types of remediation activities have been performed to remove the source of contamination, and usually requires long periods of monitoring activities to establish the stability and decreasing trends of the contaminant plume. This method is typically used for fuels, oils, and other organic chemicals.

Vapor Extraction. This method involves the installation of vapor extraction wells which are connected to a vacuum source. Contaminant-laden vapors are removed from the soil and treated prior to being discharged to the atmosphere. Typically, the contaminant-laden vapors are treated using activated carbon or oxidation systems. This method typically works best to treat volatile compounds such as gasoline and solvents in highly permeable soil.

Air Sparging. Air sparging is typically used in conjunction with vapor extraction. Air sparging involves the injection of compressed air into the soil. The compressed air assists in the biological and chemical degradation of contaminants in the soil. This method typically works best to treat volatile compounds such as gasoline and solvents in highly permeable soil.

Free Product Removal. The removal of phase-separated product may be accomplished by vapor extraction, as previously discussed, or by either passive or active skimmers, or by hand-bailing. These methods are most effective with light non-aqueous phase liquids (LNAPLs) such as petroleum products (oils, fuels, and petroleum-based solvents such as mineral spirits and Stoddard solvent).

Ex situ Methods

Based on the contaminant type and the permeability of the soil, it may not be possible to treat soil *in situ*. Therefore, the soil is excavated and treated. The excavated soil can be treated onsite or

transported to an offsite treatment facility. If the soil is treated onsite, it can either be used onsite, or disposed at an offsite location.

Vapor Extraction. This method is similar to the vapor extraction previously described, except that it is conducted after the soil is excavated. This method can be used when the permeability of the soil is too low to be feasible to conduct in situ vapor extraction. In this method the soil is excavated and piled onsite. Piping is placed in the soil stockpiles for the vapor extraction. This method typically works best to treat volatile compounds such as gasoline and solvents.

Bioremediation. This method involves the addition of nutrients, water, oxygen, and possibly bacteria to excavated soil. The nutrients, water, and oxygen will increase the indigenous or added bacteria populations. The bacteria use the selected contaminants as a food source. Bioremediation has been proven successful in the treatment of many contaminants including fuels, oils, and other organic chemicals.

Fixation. This method involves the addition of chemicals (cement is typically used) to the excavated soil to reduce the potential for the contaminant to be mobile. This method is typically used to treat inorganic compounds such as metals.

Thermal Desorption. This method involves heating the excavated soil to cause the contaminant to volatilize and migrate from the soil as a vapor. The vapor is then treated, using activated carbon or by a catalytic oxidation unit, and discharged to the atmosphere. This method is typically used to treat organic compounds such as fuels, oils, and solvents. A portable unit is placed adjacent to or on the site where the contaminated soils are being excavated or stockpiled.

Offsite Thermal Desorption. Similar to the desorption process described above, this method involves transporting the excavated soil to an offsite facility for treatment. The soil is then transported back to the site for use as backfill or transported elsewhere for use or disposal.

Offsite Incineration. This method involves heating the excavated soil to cause the contaminant to volatilize and oxidize. The exhaust is treated by conventional methods (e.g., air scrubbers, catalytic oxidation units, etc.) prior to being released into the atmosphere. This method is typically used to treat organic compounds such as fuels, oils, and solvents.

Offsite Bioremediation/Soil Washing. This process is similar to onsite bioremediation described above except that the excavated soil is transported to an offsite facility where nutrients, water, oxygen, and possibly bacteria are added to the excavated soil. The nutrients, water, and oxygen will increase either the indigenous or added bacteria populations. The bacteria are able to use selected contaminants as a food source. Bioremediation has been proven successful in treating many contaminants including fuels, oils, and other organic chemicals.

Offsite Storage of Hazardous Materials. Redevelopment activities resulting from the Downtown Community Plan would be required to comply with hazardous material storage requirements contained in City of San Diego Municipal Code Sections 55.0101 through 55.9201 and the Uniform Fire Code Section 8003. Therefore, there would be no conflict.

5.10.3.2 Hazardous Waste Sites (HAZ-B)

Due to the nature of historic and current land uses located throughout the downtown planning area, there is a high potential for encountering hazardous materials sites identified on registers compiled pursuant to Government Code Section 65962.5. However, significant impacts to human health and the environment would be avoided through compliance with mandatory federal, state, and local regulations described previously.

With respect to the Tow Basin Facility hazardous release site located downtown, in November 2004, the Department of Toxic Substances Control approved the Final Implementation Report for the site which resulted in remedial action. The entire building was demolished and 142,477 pounds of PCB contaminated solids were removed and transported offsite for disposal. No further remedial action is required. Therefore, this site would not pose a substantial risk to current and future residents of the downtown planning area and there would be no impact.

5.10.3.3 Emergency Preparedness (HAZ-C)

As redevelopment proceeds in the downtown planning area as a result of the proposed Downtown Community Plan, urbanized areas would intensify. As intensification of uses increases, the potential impacts of man-made or natural disaster could also increase. The ongoing implementation and updating of the City of San Diego's Emergency Operations Plan would assure adequate response to emergencies. In addition, the City would continue to cooperate with federal and state emergency preparedness agencies. In particular, the City would continue to participate in the Unified San Diego County Emergency Services Organization to assure regional cooperation and assistance with emergencies within the City. The City would also continue to conduct drills and training simulations for the emergency operations center to assure improved operation in the event of an actual disaster.

5.10.4 MITIGATION MEASURES

Adherence to federal, state and local regulations controlling hazardous materials would be sufficient to avoid significant impacts from hazardous materials. No mitigation measures are required.

5.10.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

No significant hazardous materials impacts would occur with approval of the proposed Plans and Ordinances as well as subsequent development in accordance with these Plans and Ordinances.

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5.11 POPULATION/HOUSING

5.11.1 EXISTING CONDITIONS

This section provides an overall discussion of population and housing conditions in the downtown planning area. For the purpose of this discussion, the evaluation of population and housing is based on 1990 and 2000 U.S. Census data, 2004 SANDAG estimates, and 2030 SANDAG projections. Census tracts were used to estimate population and demographic statistics for the downtown planning area (Figure 5.11-1).

5.11.1.1 Population

According to the most recent population estimates for 2004, the total population downtown has grown by approximately 46% to 21,237,27,500 since the 1990 Census was taken. Projecting to the future, the Cities/County Forecast developed by SANDAG estimates the downtown population will reach 59,598 by 2030 under the existing Centre City Community Plan.

5.11.1.2 Housing

Housing in the downtown planning area is dominated by high-density, multi-family residential apartment and condominium buildings. In 2004, the total housing stock (the total number of housing units) numbered 11,419 (Table 5.11-1). Of this, over 95% of housing units are classified as multi-family residential. Single-family residential and other residential comprise the balance. The preference for multi-family residential development downtown has resulted in a high intensity of residential space, where many families live above one another in high-rise buildings, rather than each individual family living side by side on the ground level. As a consequence, the average density of 108 housing units per residential acre downtown is considered to be relatively high.

**Table 5.11-1
Downtown's Housing Stock**

YEAR	TOTAL HOUSING STOCK	SINGLE FAMILY (%)	MULTIPLE FAMILY (%)	OTHER (%)
2004	11,419	4	95	<1

In addition to the high density of residential uses, downtown has a very high occupancy rate. For multi-family housing, approximately 92% of units are occupied. For single-family housing, approximately 88% are occupied. The high occupancy rates combined with the fact that market values for condominiums and rentals are currently very competitive demonstrate that the demand for downtown housing is strong.

5.11.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to population and housing if the goals, policies, objectives or

regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion POP-A Induce substantial population growth to result in adverse physical changes; or

Significance Criterion POP-B Displace a substantial number of existing housing units or people, necessitating construction of replacement housing.

5.11.3 ENVIRONMENTAL IMPACTS

5.11.3.1 Population (POP-A)

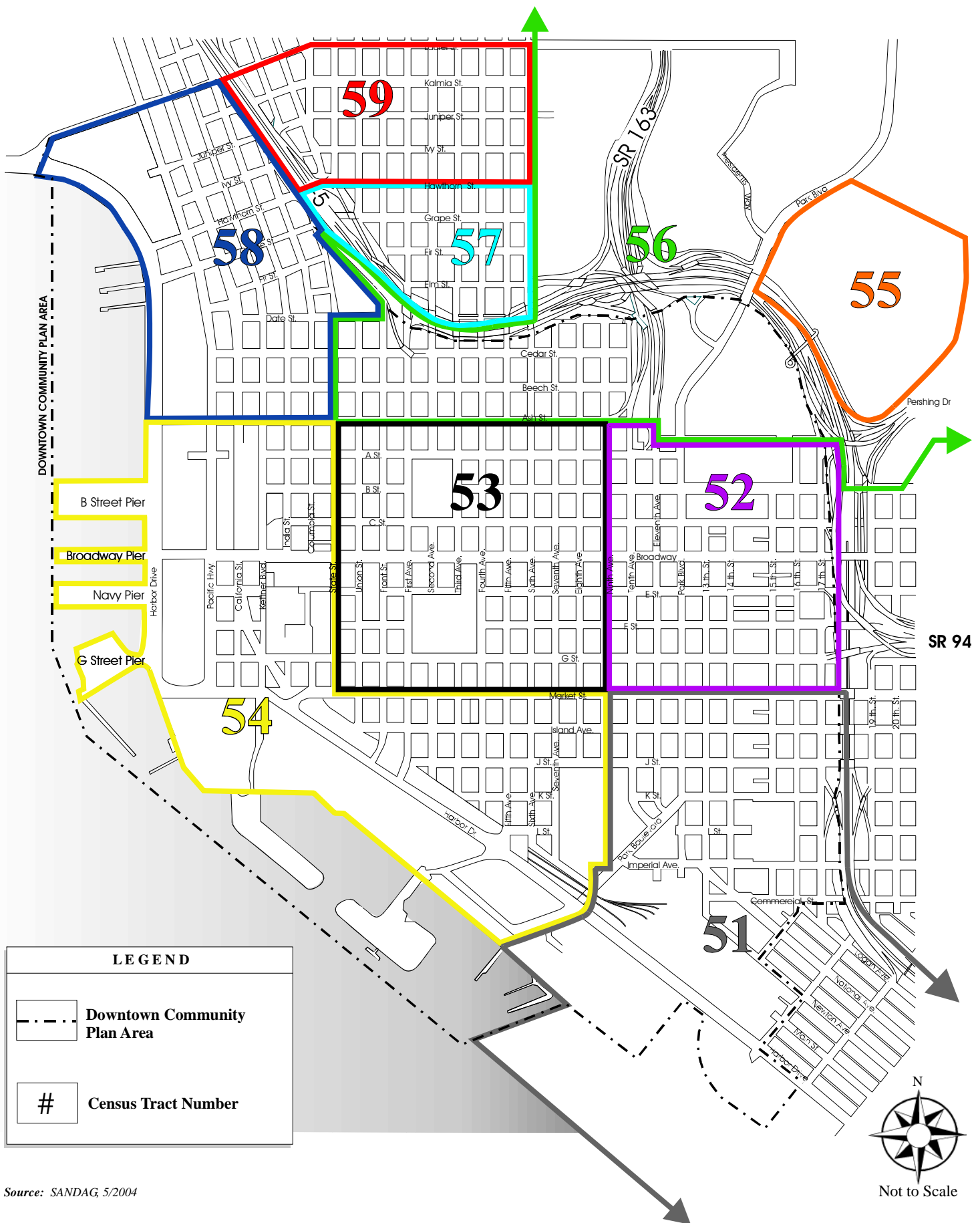
Implementation of the Downtown Community Plan would form the basis for anticipating population growth in the downtown planning area. The residential designation in addition to the maximum FAR would allow for a range of dwelling unit densities across the downtown area. The number of dwelling units would realistically fall below that which would be allowed by the maximum FAR due to economic constraints.

Based on the land use allocations of the Land Use Map (Chapter 5.1), CCDC is projecting a maximum population of 89,100 by 2030 under the proposed Community Plan. Therefore, the existing population of 27,500 would more than quadruple as a result of the Downtown Community Plan. While development of the proposed Land Use Map is based on expected densities of development, the actual population growth may be lower depending on changes in regional housing trends and local economies.

CCDC's population projection for the Downtown Community Plan would be greater than the projections in the 2030 Cities/County Forecast developed by SANDAG. As noted above, SANDAG's projected population in the downtown planning area for the year 2030 would be 59,598, while CCDC is estimating a year 2030 population of 89,100. The difference of 29,502 residents represents nearly a 50 percent increase. Potential adverse physical changes that would be associated with this increase, such as increased water and energy consumption and increased traffic and air quality impacts, are issue-specific and are addressed in Chapter 5.0 of the EIR.

5.11.3.2 Housing (POP-B)

Based on examination of the land use designations and maximum FAR allowed on the Land Use Map (Chapter 5.1), CCDC expects the number of residential units to reach a maximum of 53,100 by the year 2030 as a result of implementation of the Downtown Community Plan. Therefore, the existing number of residential units would increase by approximately 360 percent.



Downtown Census Tracts Figure 5.11-1

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The year 2030 residential unit projection for the proposed Downtown Community Plan would be greater than that anticipated by the 2030 Cities/County Forecast. SANDAG's projected number of residential units in the downtown planning area is 34,282 by 2030. The difference between CCDC's estimate based on the Land Use Map and the SANDAG forecast is 18,818 residential units. Therefore, the proposed Plan would contribute additional housing to a region that is currently experiencing housing deficiencies and would have a beneficial effect on housing supply.

5.11.4 MITIGATION MEASURES

As no significant population or housing impacts would occur with the proposed Community Plan, no mitigation measures are required.

5.11.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

No significant population or housing impacts would occur as a result of approval and implementation of the proposed Plans and Ordinances.

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5.12 PALEONTOLOGICAL RESOURCES

Fossils are the remains and/or traces of prehistoric plant and animal life. Fossils such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) within which they were originally buried. Paleontological resources include not only fossils, but also the collecting localities and the geologic formations containing those localities. The following discussion is based on the underlying geologic formations of the planning area identified in the geotechnical investigation prepared by URS Corporation (July 2002) (see Appendix 2.5 of the EIR) and the paleontological sensitivity of these formations (Démeré and Walsh 1993).

5.12.1 EXISTING CONDITIONS

The downtown planning area is underlain by the Pliocene aged San Diego Formation, the Pleistocene aged Bay Point Formation and recent artificial fill (refer to Figure 5.5-1 located in Chapter 5.5 Geology and Seismicity). The potential for these formations to bear fossils is described below.

San Diego Formation

The San Diego Formation is a marine sedimentary deposit of late Pliocene age (approximately 1.5-3 million years ago), which typically consists of yellowish-gray, fine-grained sandstones. The San Diego Formation is well known for its rich and well-preserved fossil beds. Important fossils that have been recovered in the San Diego Formation include marine clams, scallops, snails, crabs, barnacles, sand dollars, sharks, rays, bony fish, sea birds, walrus, fur seal, sea cow, dolphins, and baleen whales. In addition, rare remains of terrestrial mammals including cat, wolf, skunk, peccary, camel, antelope, deer, horse, and gomphothere (an elephant ancestor) have also been recovered in this formation. The San Diego Formation has also produced fossil remains of the wood and leaves of oak, pine, laurel, cottonwood, and avocado trees. Because of the diversity and quality of the fossil organisms recovered in the San Diego Formation, it is assigned a high paleontological resource sensitivity.

The San Diego Formation occurs within the northwest portion of the planning area, from I-5 south to B Street and west to Third Avenue, and between I-5 and 16th Street from Broadway to F Street.

Bay Point Formation

The Bay Point Formation is a nearshore marine sedimentary deposit of the late Pleistocene age (approximately 220,000 years ago), which typically consists of light gray, fine- to coarse-grained, massive and cross-bedded sandstones. The Bay Point Formation has produced large and diverse assemblages of well-preserved marine fossils including mollusks, sharks, rays and bony fishes. This formation is assigned a high resource sensitivity.

The Bay Point Formation underlies the majority of the planning area, occurring north and east of Harbor Drive and south of I-5.

Artificial Fill

Artificial fill is not a naturally occurring formation, but is young geologic material used in the construction of the harbor and harbor facilities. It is considered to have zero paleontological resource potential. Artificial fill occurs west and south of Harbor Drive adjacent to San Diego Bay.

5.12.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to paleontological resources if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion PAL-A Substantially impact a unique paleontological resource or impact a geologic formation possessing a medium to high fossil-bearing potential.

5.12.3 ENVIRONMENTAL IMPACTS

<p style="margin: 0;">Impact PAL-A.1 Impacts to Paleontological Resources</p>
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Construction activities resulting from the Downtown Community Plan would have the potential to result in significant impacts to paleontological resources. Except in areas underlain by artificial fill, all development associated with the Downtown Community Plan would occur on geologic formations that are assigned a high paleontological resource sensitivity. Any development that involves grading or excavation beyond the one to three foot depth of surficial fills for foundations, subterranean parking, or below-grade features including utility trenches would have the potential to expose fossil-bearing geologic formations and adversely impact paleontological resources.

5.12.4 MITIGATION MEASURES

Impact PAL-A.1-1 Impact to Paleontological Resources

Mitigation Measure PAL-A.1-1: If the potential exists for significant paleontological resources, a monitoring program in accordance with the following mitigation measure would be implemented.

I. Prior to Permit Issuance

A. Construction Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, Centre City Development Corporation (CCDC) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to CCDC

1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from CCDC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction**A. Verification of Records Search**

1. The PI shall provide verification to CCDC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.
2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of any discoveries. The RE shall forward copies to CCDC.
3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to CCDC unless a significant resource is encountered.
 - d. The PI shall submit a letter to CCDC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night Work**A. If night work is included in the contract**

1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
 - a. No Discoveries
 - (1) In the event that no discoveries were encountered during night work, The PI shall record the information on the CSVr and submit to CCDC via fax by 9am the following morning, if possible.
 - b. Discoveries
 - (1) All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
 - c. Potentially Significant Discoveries
 - (1) If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
 - d. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify CCDC immediately.

C. All other procedures described above shall apply, as appropriate.**VI. Post Construction****A. Submittal of Draft Monitoring Report**

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring.
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum
 - (1) The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.
4. CCDC shall provide written verification to the PI of the approved report.
5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Report to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution.

~~**Mitigation Measure PAL-A.1-1** — Prior to the issuance of a Development Permit for any development located in an area underlain by San Diego or Baypoint Formations (geologic materials containing moderate to high paleontological resources potential) as identified in Figure 5.5-1 of the EIR, the applicant shall provide a letter of verification stating that a qualified paleontological monitor, as defined in the City of San Diego Paleontological Guidelines, has been retained to implement the monitoring program. The requirement for paleontological monitoring shall be noted on the Redevelopment Permit. The applicant shall notify CCDC of the start and end of construction.~~

- ~~a. The paleontological monitor shall attend any preconstruction meetings to make comments and/or suggestions concerning the paleontological monitoring program with the construction manager.~~
- ~~b. The paleontological monitor shall be on site full time during the initial cutting of previously undisturbed areas. Monitoring may be increased or decreased at the discretion of the paleontological monitor, and will depend on the rate of excavation, the materials excavated, and the abundance of fossils.~~
- ~~c. When requested by the paleontological monitor, the applicant's contractor shall divert, direct, or temporarily halt ground disturbance activities in the area of discovery to allow recovery of fossil remains. The paleontologist shall immediately notify CCDC staff of such findings at the time of discovery. The significance of the discovered resources shall be determined by the paleontological monitor, in consultation with CCDC. CCDC must concur with the evaluation before grading activities will be allowed to resume.~~
- ~~d. The paleontological monitor shall be responsible for preparation of fossils to a point of identification, as defined in the City of San Diego Paleontological Guidelines, and submittal of a letter of acceptance from a local qualified curation facility. Any~~

~~discovered fossil sites shall be recorded by the paleontologist at the San Diego Natural History Museum.~~

~~e. Within three months following the completion of grading, a monitoring results report, with appropriate graphics, summarizing the results, analysis and conclusions of the paleontological monitoring program shall be submitted to and approved by CCDC.~~

5.12.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impact PAL-A.1-1 Impact to Paleontological Resources

Level of Significance After Mitigation: Not Significant

Implementation of Mitigation Measure PAL-A.1-1 would reduce potentially significant impacts to paleontological resources to below a level of significance.

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5.13 ENERGY

Information regarding electricity and natural gas service in the downtown planning area was provided by written correspondence from San Diego Gas and Electric (SDG&E), a Sempra Energy utility.

5.13.1 EXISTING CONDITIONS

5.13.1.1 Electricity

Based on existing land uses, it is estimated that the average consumption of electricity downtown is approximately 1.8 million kilowatt hours (kWh) per day.

Three substations serve the downtown area; they are referred to as Station B, Urban, and Sampson.

- Station B is located on the west side of Kettner, between E and F Streets, and is a 120 MVA, 69/12kV substation, consisting of four 20 MVA transformers with four sections of switch gear to accommodate 16 circuits.
- Urban is located on the southeast corner of 14th and F streets, and is a 69/12kV substation. It currently has three 20 MVA transformers, with a planned buildout of 120 MVA. The substation consists of four sections of switch gear to accommodate 15 circuits.
- Sampson, is located on the southwest corner of Sampson Street and Harbor Drive. It has an existing capacity of 120 MVA, 69/12kV, consisting of four 30 MVA transformers with four sections of switch gear to accommodate 16 circuits.

The electrical distribution lines serving downtown are located both above ground and underground. Each year, SDG&E allocates capital funds for the purpose of converting overhead electric distribution lines. Under the provisions of Rule 20A established by the California Public Utilities Commission, the City may designate major streets for undergrounding overhead lines. In general, all new commercial, industrial and residential developments are required to accept underground service.

SDG&E has the capacity to meet the present demand for electrical service. However, SDG&E has forecasted that the downtown-serving substations will have an aggregate loading of 93% by 2006 and will be fully loaded by 2010. To prevent extended outages and disruption of services to new and existing customers, maintain distribution system operating flexibility, as well as maintain reliable service to SDG&E customers, SDG&E is currently constructing a four-bank ultimate 120 MVA distribution substation (to be known as the Grant Hill Substation) in Uptown.

5.13.1.2 Natural Gas

The amount of natural gas used downtown varies widely throughout the year. Based on current land uses, the average use of natural gas in the downtown planning area is estimated to be 5.3 million cubic feet per day.

Approximately 97 percent of the natural gas consumed in SDG&E's service territory is transported through seven major interstate and intrastate transmission pipelines. These transmission lines are connected to out-of-state supply basins in New Mexico, Texas, the Rocky Mountains, and the Canadian West. The remaining three percent is produced in California and transported through transmission lines located along the coast and in the Central Valley. Ultimately, all of these sources travel through pipelines owned by Southern California Gas Company before delivery into SDG&E's natural gas system.

Natural gas service is provided to downtown customers in pipes that vary from one-half inch to two inches in diameter. The downtown system has pipes that are Schedule 40 grade "B" steel and medium-density polyethylene. The major distribution pipes delivering gas to and through the downtown area enter at three locations. In the northwest, there is a 12-inch steel line in Kettner Boulevard. In the northeast, another 12-inch steel pipe enters along Park Boulevard. A third 12-inch pipe is located in the southern part of the downtown planning area in National Avenue.

According to SDG&E, the current natural gas distribution system is in good operating condition and is adequate to meet the current demand.

5.13.2 SIGNIFICANCE CRITERIA

Adoption and implementation of the proposed Plans and Ordinances would result in a significant, adverse environmental impact related to energy if the goals, policies, objectives or regulations established by the planning documents and/or anticipated subsequent development in accordance with those documents would:

Significance Criterion E-A Result in a significant physical change associated with expanding or constructing new electricity or natural gas facilities to meet the anticipated demand created by the proposed Plan.

5.13.3 ENVIRONMENTAL IMPACTS

5.13.3.1 Electricity

Additional development resulting from the implementation of the proposed Downtown Community Plan would increase electricity demand and would require additional supply compared to existing conditions. Based on the projected commercial, industrial, and residential growth downtown, it is estimated that the downtown planning area under the proposed Plan would use approximately 1.82 billion kWh of electricity per day, based on a California average of 7,178 kWh consumed per capita per day multiplied by the projected total residential and employment population of 253,800. Although this would represent an increase of 1.09 billion kWh over the present consumption, it is anticipated that SDG&E would be able to provide the infrastructure needed to supply this amount of electricity with the three existing substations downtown and the approved station in the Uptown area, (which has already gone through its own environmental review and is not part of the Downtown Community Plan). Thus, meeting the electrical needs of future development in

accordance with the proposed Community Plan would not result in any physical changes which could impact the environment. Therefore, the impact would not be significant.

In addition, the Downtown Community Plan would encourage landscaped and ecologically-designed rooftops through Policy 5.8-P-6, and the Planned District Ordinance would grant a FAR bonus of 1.0 to those activities that incorporate a green roof. Not only do green roofs have a beneficial effect in terms of hydrology (see Section 5.9), but they also provide additional insulation to buildings, reducing electricity needs for heating and cooling. On a larger scale, green roofs help to reduce the heat island effect, a phenomenon where temperatures in urban areas become artificially high due to the high heat absorption of asphalt and other dark surfaces. The increase in local temperature causes an increased use in air conditioning and electricity. The Downtown Community Plan's promotion of green roofs would help to reduce the heat island effect and electricity demand downtown-wide.

5.13.3.2 Natural Gas

Based on an average natural gas consumption of 193.7 cubic feet per day per person, it is anticipated that natural gas consumption would reach approximately 49 million cubic feet per day as a result of implementation of the Downtown Community Plan. While this value is nearly 250% the daily consumption rate currently estimated for the downtown area, it is anticipated that SDG&E would be capable of providing the infrastructure required to meet the natural gas demand of the proposed downtown uses with the existing infrastructure serving downtown. Thus, meeting the natural gas needs of future development in accordance with the proposed Community Plan would not result in any physical changes which could impact the environment. Therefore, the impact would not be significant.

5.13.4 MITIGATION MEASURES

As no significant physical impacts are anticipated, no mitigation measures are required.

5.13.5 SIGNIFICANCE OF IMPACT AFTER MITIGATION

Impacts related to electricity and natural gas service would be less than significant.

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CHAPTER 6.0

CUMULATIVE IMPACTS

6.1 BACKGROUND

Section 15130 of the State CEQA Guidelines requires that an EIR “address cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” According to Section 15065(c), “cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Based on Section 15130, the discussion of cumulative effects “need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.”

The evaluation of cumulative impacts is required by Section 15130 to be based on either (A) “a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency,” or (B) “a summary of projections contained in an adopted plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

Since the project, which is the subject of this EIR, involves a Community Plan, the focus of this cumulative analysis is upon cumulative effects that may occur from development in accordance with the proposed Downtown Community Plan in combination with other communities within the County of San Diego. The cumulative effects of projects occurring within the downtown planning area is, in reality, the subject of Section 5.0 this EIR. As discussed in Section 5.0, that analysis is based on the environmental effects that would occur as the proposed downtown planning area is built out.

With a broad focus on the cumulative effects of development within the Community Plan in combination with other communities in the County, it is impossible to identify specific projects to serve as a basis of comparison. Thus, it is necessary, and appropriate, to rely on regional planning documents, in accordance with Section 15130(b)(1)(B), to serve as the basis for the analysis of the cumulative effects of the proposed Plan.

Regional plans prepared by SANDAG, SDAPCD, SDRWQCB, and the City of San Diego form the foundation for this cumulative analysis. Regional planning documents, which are referenced in this cumulative analysis, are summarized in the following discussion. These publications are available for inspection at the agency which prepared the document.

6.1.1 REGIONAL COMPREHENSIVE PLAN

The Regional Comprehensive Plan (RCP) is a long-range planning document that encourages local jurisdictions to address the San Diego region's housing, economic, transportation, environmental and overall quality of life needs. The RCP establishes a planning framework and implementation actions that aim to increase the region's sustainability and encourage "smart growth". The RCP and an accompanying EIR were approved in July 2004 by the San Diego Association of Governments (SANDAG).

To encourage regional sustainability and smart growth, the RCP aims to reduce the number of housing units and residents that are expected to be needed within the region, but are developed outside the region, by 2030. To achieve this, the Plan identifies certain areas in the region as Smart Growth Opportunity Areas (SGOA). Designation of these opportunity areas is intended to provide guidance to local governments, property owners, and service providers as to where smart growth development should occur from a regional perspective, and encourages local jurisdictions to focus attention on these areas as they update their general plans and redevelopment plans. Once these areas are designated by local jurisdictions for development types, densities, and intensities consistent with the goals of this Plan, transportation facility improvements and other infrastructure to these areas will be prioritized. The intended effect of this effort is to attract housing units that are otherwise anticipated to be exported from the San Diego region to Baja California, Riverside County, Orange County and Imperial County by 2030. The RCP redirects those housing units to areas within the region that are located along the existing and proposed regional transportation corridors as well as other locations where compact development is appropriate. A portion of this redirected development will occur in areas of vacant land and a portion will occur as redevelopment and infill development in existing communities.

6.1.2 LAND USE DISTRIBUTION ELEMENT OF THE REGIONAL GROWTH MANAGEMENT STRATEGY

As part of the Regional Growth Management Strategy, the Land Use Distribution Element, which was approved by SANDAG in February 1995, strives to distribute San Diego's future population growth in a manner that maintains and enhances the region's quality of life. Specifically, it recommends that cities revise their general plans to include policies that would focus development in areas with good transit access, improve pedestrian circulation, and provide housing in employment areas.

6.1.3 2030 PRELIMINARY CITIES/COUNTY FORECAST

The long-range forecasts of population, housing, and employment that SANDAG has prepared since the early 1970s are used as a resource by elected officials, planners, academics, and the public. The Preliminary 2030 Cities/County Forecast was released in October 2002. Among other uses, the latest forecast is the basis for the 2030 Regional Transportation Plan (Mobility 2030), which is discussed below, and the Regional Comprehensive Plan.

6.1.4 REGIONAL TRANSPORTATION PLAN (MOBILITY 2030)

MOBILITY 2030 is San Diego's Regional Transportation Plan (RTP) – the blueprint to address the mobility challenges created by regional growth. This long-range plan contains an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system in the San Diego region through the year 2030. The plan's vision for transportation supports the region's comprehensive strategy to promote smarter, more sustainable growth. At the core of MOBILITY 2030 are seven policy goals:

- Mobility – Improve the mobility of people and freight;
- Accessibility – Improve accessibility to major employment and other regional activity centers;
- Reliability – Improve the reliability and safety of the transportation system;
- Efficiency – Maximize the efficiency of the existing and future transportation system;
- Livability – Promote livable communities;
- Sustainability – Minimize effects on the environment; and
- Equity – Ensure an equitable distribution of the benefits among various demographic and user groups.

Land Use and Environment

Smart Growth and the Regional Comprehensive Plan – the following proposed actions support the RTP goals of Accessibility, Livability, Sustainability, and Equity.

1. ...update local general and community plans and zoning codes to encourage smart growth development and to strengthen the implementation of the Regional Comprehensive Plan.

Integrating Transit – The following proposed actions support the RTP goals of Mobility, Accessibility, Livability, Sustainability, and Equity.

5. Integrate local land use plans and policies with smart growth and the Regional Transit Vision (RTV) principles and goals.

Systems Development

Highways and Arterials – the following actions support the RTP goals of Mobility, Reliability, Efficiency, and Sustainability.

22. Incorporate planned highway network identified in the RTP into local general plans, community plans, and specific project development plans, and reserve appropriate right of way through the subdivision review process and other means.

The Final EIR for the 2030 RTP, Mobility 2030 was certified in April 2003.

6.1.5 DRAFT 2002 CONGESTION MANAGEMENT PROGRAM UPDATE

State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a CMP. The purpose of the CMP is to monitor the performance of the region's transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG, as the designated congestion Management Agency for the San Diego region, must develop, adopt and update the CMP in response to six specific legislative requirements. SANDAG, local jurisdictions, and transportation operators (i.e., Caltrans, MTDB, NCTD, etc.) are responsible for implementing and monitoring the CMP.

Local jurisdictions are responsible for collecting and reporting CMP arterial traffic data, preparing Deficiency Plans where required, and implementing the CMP Land Use Analysis Program. In addition, local jurisdictions are responsible for reviewing, approving, and monitoring new development project mitigation.

One element of the existing 1996 CMP that is the direct responsibility of CCDC is the enhanced CEQA review process to conduct traffic impact studies and provide mitigation for large project impacts on the regional transportation system. A large project is defined as generating, upon its completion, an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak-hour vehicle trips.

6.1.6 STATE IMPLEMENTATION PLAN AND REGIONAL AIR QUALITY STRATEGY

The CARB, which is responsible for improving air quality in the state, has established 14 air basins within California. The downtown planning area lies within the San Diego Air Basin (San Diego County), which is monitored by the SDAPCD. In 1979, the EPA required each state to prepare a SIP. A SIP is a compilation of goals, strategies, schedules, and enforcement actions designed to lead the state (including the San Diego Air Basin) into compliance with all federal air quality standards. In order to meet federal air quality standards in California, the CARB required each air basin to develop its own strategy for achieving the national ambient air quality standards. In response, the SDAPCD prepared the RAQS. The measures incorporated into the RAQS are considered to be effective based on the region's projected population growth as well as the projected transportation facilities as incorporated into SANDAG's RTP. The RAQS are a combination of measures affecting car pooling, parking regulations, truck use, and development density and mixes, as well as limitations on stationary sources, such as electric power generation stations, and area sources, such as barbecue lighter fuel burning.

6.1.7 WATER QUALITY CONTROL PLAN FOR THE SAN DIEGO BASIN (9)

As part of its regulatory powers, the SWRCB, in conjunction with the RWQCB, has the responsibility of formulating and adopting long-range policies and objectives for water quality

through the preparation of the Water Quality Control Plan for the San Diego Basin (9) (RWQCB 1994). The San Diego Basin Plan establishes a number of beneficial uses and water quality objectives for surface and groundwater resources.

Beneficial uses are generally defined in the Basin Plan as “the uses of water necessary for the survival or well being of man, plus plants and wildlife.” The plan identifies beneficial uses for the San Diego Bay. See Section 5.9.1.4 for details.

Water quality objectives identified in the Basin Plan are based on established beneficial uses, and are defined as “the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses.” Water quality objectives are thus derived from beneficial uses, which are based on the ability of given water sources (in terms of water quality) to safely accommodate specific uses.

6.2 SIGNIFICANT CUMULATIVE IMPACTS

6.2.1 AIR QUALITY

6.2.1.1 Impact

Impact AQ-A.1
Increase in mobile source
emissions

As discussed in Section 5.8, the San Diego Air Basin is currently classified by the US EPA as a non-attainment area for ozone and PM₁₀. All new development in the San Diego Air Basin compounds these problems by creating more emissions. New development within the downtown planning area would be no exception, creating long-term air emissions related primarily to increased vehicular use and short-term dust during construction. Because the San Diego Air Basin already is impacted, any new development would have a significant cumulative impact on regional air quality. Thus, implementation of the proposed Downtown Community Plan would result in a significant cumulative air quality impact. Although the cumulative impact would be significant, the proposed Plan would concentrate development in an area which is well served by transit and offers a variety of opportunities to work and live in the same area.

Impact AQ-B.1
Construction Emissions

As discussed in Section 5.8, emissions related to construction activity are considered short-term sources as their duration is limited to the period of construction at any single site within downtown. However, depending on the number and proximity of individual construction activities, the construction air emissions could constitute a significant cumulative impact.

6.2.1.2 Mitigation

Impact AQ-A.1 Increase in mobile source emissions

Federal, state and local regulations mandate as well as recommend measures to be incorporated by subsequent development within the Air Basin are anticipated to be incorporated into future development within downtown, as appropriate.

Impact AQ-B.1 Construction Emissions

Federal, state and local regulatory mandates as well as recommended measures are anticipated to be incorporated during subsequent construction activities, as appropriate.

6.2.1.3 Significance of Impact After Mitigation

Impact AQ-A.1 Increase in mobile source emissions

Level of Significance After Mitigation: Significant

Although the proposed Plans and Ordinances would promote non-vehicular travel (e.g. walking and cycling) and implement smart growth principles, implementation of these measures would not be sufficient to reduce cumulative impacts to below a level of significance.

Impact AQ-B.1 Construction Emissions**Level of Significance After Mitigation: Significant**

While implementation of dust and construction equipment emission controls would reduce emissions, at certain times they may not be sufficient to reduce cumulative impacts to below a level of significance when a number of construction projects are occurring simultaneously.

6.2.2 CULTURAL-HISTORICAL RESOURCES**6.2.2.1 Impacts**

Impact CULHIST-A.1
Impacts to Historical Resources

The demolition or substantial alteration of significant historic resources in combination with the loss of similar resources in the region would result in a cumulatively significant historical impact.

Historic resources continue to be lost within San Diego County, and any loss of these resources due to buildout of the Downtown Community Plan could result in a significant cumulative impact.

Impact CULHIST-B.1
Impacts to Archaeological Resources

Impacts to important archaeological sites associated with redevelopment could combine with the loss of other important archaeological resources in the region and result in a significant cumulative impact.

6.2.2.2 Mitigation

Impact CULHIST-A.1 Impacts to historical resources

No measures beyond those required by federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments in accordance with the proposed Plans and Ordinances. Therefore, there are no additional mitigation measures for cumulative historic resource impacts.

Impact ~~CULHIST~~-B.1 Impacts to archaeological resources

No measures beyond those required by federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments in accordance with the proposed Plans and Ordinances. Therefore, there are no additional mitigation measures for cumulative archaeological resource impacts.

6.2.2.3 Significance of Impact After Mitigation**Impact ~~CULHIST~~-A.1** Impacts to historical resources**Level of Significance After Mitigation: Significant**

As indicated above, no measures can be applied which would reduce potential cumulative historical impacts to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

Impact ~~CULHIST~~-B.1 Impacts to archaeological resources**Level of Significance After Mitigation: Significant**

As indicated above, no measures can be applied which would reduce potential cumulative archaeological impacts to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

6.2.3 HYDROLOGY/WATER QUALITY**6.2.3.1 Impacts**

Impact WQ-A.1 Surface Water Pollution

Since urban runoff has already adversely impacted water quality in San Diego Bay, the addition of any pollutants in urban runoff discharged into the Bay would result in a cumulatively significant impact to water quality. As discussed in Chapter 5.9, San Diego Bay is currently experiencing water quality problems caused by urban development within its watershed. Mandatory compliance with federal state and local regulations regarding short-term and long-term control of urban runoff and erosion would serve to reduce the direct impacts of future development on hydrology/water quality. In addition, the Plan would include policies to reduce urban runoff and associated pollutants generated from future development activities. Although existing regulations, Plan policies and implementation of mitigation measures contained in Chapter 5.9 would reduce direct water quality impacts to below a level of significance, cumulative water quality impacts would be unavoidable.

With respect to hydrology, the Downtown Community Plan would not result in substantial modification to the area's drainage basin. As the Plan would result in the same or less surface runoff from that which presently occurs, the Plan would not substantially contribute to existing impacts to the storm drain system.

6.2.3.2 Mitigation

Impact WQ-A.1 Surface Water Pollution

No measures exist beyond those required by federal, state and local regulations as well as proposed goals and policies are within the control of CCDC or future individual developments in accordance with the proposed Plans and Ordinances. Therefore, there are no additional mitigation measures for cumulative water quality impacts.

6.2.3.3 Significance of Impact After Mitigation

Impact WQ-A.1 Surface Water Pollution

Level of Significance After Mitigation: Significant

As indicated above, no measures can be applied which would reduce potential cumulative water quality impacts to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

6.2.3 LAND USE COMPATIBILITY

6.2.4.1 Impacts

<p>Impact LU-B.5 Transient Impacts</p>
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Increased development activities downtown would combine with those expected in surrounding neighborhoods to displace homeless populations encouraging them to move into less active areas in surrounding neighborhoods.

6.2.4.2 Mitigation

Impact LU-B.5 Transient Impacts

As discussed in Chapter 5.1, no measures beyond those already being implemented by social service and charity organizations in the downtown area exist.

6.2.4.3 Significance of Impact After Mitigation

Impact LU-B.5 Transient Impacts

Level of Significance After Mitigation: Significant

Existing programs offered to the homeless have not proven completely effective in meeting the needs of the homeless population. As there are no other measures identified, cumulative impacts from migration of homeless into surrounding neighborhoods is considered significant and unmitigable.

6.2.5 NOISE

6.2.5.1 Impacts

<p>Impact NOI-A.1 Traffic Noise Increase</p>

Traffic noise increases on nine of the grid street segments would significantly increase with the addition of traffic from the proposed Community Plan in combination with other new sources of traffic.

As discussed in Section 5.7, increased automobile trips related to new development within the downtown planning area would combine with automobile trips on grid streets to cause nine segments to increase by more than 3 dB(A) or exceed 65dB(A).

The additional traffic to the freeways was determined to not be significant.

No major new stationary noise sources are anticipated to result from implementation of the proposed Downtown Community Plan. Construction noise would create short-term noise levels, but would not be additive with other construction noise within the region. Furthermore, construction noise would adhere to controls established by the City's Noise Abatement and Control Ordinance.

6.2.5.2 Mitigation

Impact NOI-A.1: Traffic noise increase

No feasible mitigation measures are available to reduce the significant increase in traffic noise on affected roadway segments. In most cases, insufficient room exists to construct a noise attenuation wall to reduce exterior traffic noise and, if feasible, the wall would only protect ground level areas. While buildings within the affected area could be retrofitted to attenuate the effects of the noise increase, implementation of such a mitigation strategy is not considered feasible given the expected cost and complexity associated with undertaking such a program. As the impact would be aggregate in nature, the obligation to carry out this program would not fall upon any single development. Lastly, existing property owners must consent to the retrofit. As some owners may choose not to allow the retrofitting, the impact could remain unmitigated.

6.2.5.3 Significance of Impact After Mitigation

Impact NOI-A.1 Traffic Noise Increase

Level of Significance After Mitigation: Significant

As indicated above, no measures can be applied which would reduce potential cumulative traffic noise increases to below a level of significance. Thus, potential impacts are considered significant and unmitigable.

6.2.6 TRAFFIC/CIRCULATION/PARKING

6.2.6.1 Impacts

Impact TRF-A.1.1

Impacts to grid streets

The increased traffic volumes from buildout of the proposed Plan in combination with other increases in traffic would result in a significant cumulative impact on two intersections. The intersections of First Avenue and Elm Street as well as 13th Street and K Avenue would experience significant cumulative impacts.

Impact TRF-A.1.2

Impacts to surrounding streets

The increased traffic volumes could result in significant congestion on major streets in the surrounding neighborhoods. Build-out of the proposed Downtown Community Plan in combination with other new trips on surrounding roadways would have a cumulatively significant impact on several roadways. The following street segment already operates at LOS F and would experience significant cumulative impacts as a result of buildout of downtown under the proposed Plan: 28th Street (between Harbor Drive and Broadway).

Impact TRF-A.2.1

Increased freeway traffic

Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps. Interstate 5 between SR-94 and Pershing Drive would experience a cumulatively significant impact as would SR 163 between I-5 and Washington Avenue. The northbound onramps to I-5 at B Street and Eleventh Street would experience significant cumulative impacts as would the southbound onramp to I-5 at Grape Street.

Impact TRF-D.1

Inadequate parking supply

Buildout of downtown could create a significant parking impact due to the potential for demand to exceed supply in combination with new parking demand generated in the surrounding neighborhoods.

6.2.6.2 Mitigation

Impact TRF-A.1.1: Impacts on grid streets

As discussed in Chapter 5.2, implementation of the improvements identified in Table 5.2-20 would potentially reduce the cumulative impacts to below a level of significance. However, as pedestrian considerations may conflict with these improvements, the impacts may not be able to be reduced to below a level of significance.

Impact TRF-A.1.2: Impacts to surrounding streets

Implementation of roadway improvements such as restriping and/or widening may be able to reduce cumulative impacts on surrounding roadways. Subsequent monitoring required by Mitigation Measure TRF-A.1.1-1 would determine appropriate improvements.

Impact TRF-A.2.1: Increased freeway traffic

Implementation of Mitigation Measures TRF-A.2.1-1 and 2 would help reduce the cumulative impacts from downtown traffic by promoting regional planning and funding for improving freeways which serve downtown. However, as construction of improvements to freeways are beyond the control of the City of San Diego, CCDC and future development, the cumulative impacts on freeways are considered significant and not mitigated. Improvements are at the discretion of Caltrans.

Impact TRF-D.1: Inadequate parking supply

The demand for parking at buildout would exceed the amount of parking supply that would be created solely from conforming to the parking requirements of the proposed PDO. While public and/or private parking facilities may be constructed to fulfill the shortfall resulting from simple compliance with the PDO parking regulations, no guarantee exists that this would occur.

6.2.6.3 Significance of Impact After Mitigation**Impact TRF-A.1.1** Impact on grid streets.**Level of Significance After Mitigation: Significant**

Although roadway improvements appear feasible to reduce cumulative impacts at two grid intersections. Adverse effects on pedestrians or cyclists could cause these improvements to not be carried out. Thus, impacts on downtown intersections are considered cumulatively significant and potentially unmitigable.

Impact TRF-A.1.2 Impact on surrounding streets.**Level of Significance After Mitigation: Significant**

Although improvements may subsequently be identified to reduce cumulative impacts on surrounding streets, no assurances exist that they would be feasible and/or implemented. Therefore, impacts are considered cumulatively significant and potentially unmitigable.

Impact TRF-A.2.1 Increased freeway traffic.**Level of Significance After Mitigation: Significant**

Impacts to the freeway system are considered significant and unmitigable for several reasons. First, CCDC and the City of San Diego do not have jurisdiction to improve the freeway system. Second, adjacent land uses severely constrain the ability of Caltrans to implement major modifications to the freeway system.

Impact TRF-D.1 Excessive parking demand.

Level of Significance After Mitigation: Significant

While public and/or private parking facilities may be constructed to fulfill the shortfall resulting from simple compliance with the PDO parking regulations, no guarantee exists that this would occur. Thus, parking impacts are considered significant and unmitigable.

6.3 NON-SIGNIFICANT CUMULATIVE IMPACTS

6.3.1 ENERGY

Although buildout of the proposed Plan would increase demand for both electricity and natural gas, SDG&E has indicated that it has planned for the future population of the downtown area and would be able to serve the needs of the future population. Thus, implementation of the proposed Downtown Community Plan would not result in a significant cumulative impact on energy.

6.3.2 GEOLOGY AND SEISMICITY

The major geologic hazards associated with the downtown planning area are related to seismic groundshaking. Impacts associated with future development under the proposed Community Plan would be site-specific and not additive. In addition, potential direct impacts to future development would be reduced to below a level of significance through implementation of policies contained in the Health and Safety Chapter of the Community Plan, including the implementation of all seismic-safety development requirements. Therefore, implementation of the proposed Plan would not result in cumulative impacts related to geology and seismicity.

6.3.3 HAZARDOUS MATERIALS

Implementation of the proposed Community Plan would result in the redevelopment of obsolete, deteriorated, and dilapidated structures. The development of new structures or rehabilitation of older structures in accordance with the Health and Safety Chapter of the proposed Community Plan, as well as existing local, state, and federal requirements would assure that toxic and hazardous materials contamination in the soil and groundwater would be remediated. In addition, asbestos-containing building materials and lead paint would be removed prior to demolition or rehabilitation of older structures. These improvements are considered a positive effect on the health, safety, and welfare of the inhabitants of these structures. Consequently, the proposed Plan would not result in significant cumulative impacts.

6.3.4 LAND USE POLICY CONFORMANCE

As discussed in Chapter 5.1, the proposed Community Plan would be consistent with the goals of the Regional Comprehensive Plan in promoting “smart growth.” The Downtown Community Plan’s neighborhood concept would result in pedestrian-oriented and -scaled neighborhoods, each focused

on a mixed-use center and a park. The mixed-use center would be located within a relatively short walking distance of employment and housing, to make neighborhood amenities accessible without the use of a car. In addition, smart growth would be achieved with the proposed increase in intensity of uses. Downtown would maximize its infill development potential by encouraging multi-story residential, office, and mixed uses in appropriate areas, in anticipation of local transit improvements. Thus, the proposed Downtown Community Plan would respond to the regional land use goals established by SANDAG for the region and minimize cumulative impacts on land use.

6.3.5 PALEONTOLOGICAL RESOURCES

As discussed in Section 5.12, buildout under the proposed Community Plan could impact paleontological resources. These resources are associated with the San Diego and Bay Point formations, which are found under a large portion of the downtown planning area. In combination with other development in paleontologically-rich areas of the County, additional losses of important fossil records could occur. However, implementation of the proposed monitoring and recovery program would reduce impacts to below a level of significance. Therefore, the Plan's contribution to the cumulative impact of paleontological resources would be less than significant.

6.3.6 POPULATION/HOUSING

At buildout of the Downtown Community Plan, the residential population would be anticipated to increase over three times to a total population of approximately 89,100. The adverse physical changes associated with population increases on a cumulative level are issue-specific and are addressed in this section. However, on a regional level, population growth downtown would have beneficial environmental consequences. For example, the proposed increase in intensity and density of development as well as the mixed-use emphasis would locate residents within walking distance of parks, services, employment and other service amenities. In addition, transit opportunities would be available downtown to residents to further promote alternative forms of transportation. Region-wide, this would have positive traffic and air quality affects. Furthermore, the planned increase in residential population in an already urban environment would focus development away from agricultural and biologically-sensitive open space lands. Finally, this type of development would be consistent with development goals of the Land Use Distribution Element of the Regional Growth Management Strategy and Mobility 2030. Therefore, the cumulative impact to population would be less than significant.

The San Diego area is currently experiencing a shortage in the regional housing supply. At buildout, the proposed Downtown Community Plan would contribute an additional 38,500 housing units over existing housing stock downtown (an increase of 260%). Therefore, the proposed Plan would have a beneficial effect on regional housing supply. In addition, there are no anticipated major conversions of planned residential land to non-residential uses within the downtown planning area. As a result, significant cumulative impacts on downtown housing are not anticipated.

6.3.7 VISUAL QUALITY

As discussed in Section 5.6, views of San Diego Bay and the San Diego-Coronado Bay Bridge would be most affected by future development in the East Village neighborhood. Development in

the neighborhoods surrounding downtown would not lie between viewpoints and these visual resources. Thus, no cumulatively significant impacts to view corridors would occur.

6.3.8 PUBLIC FACILITIES AND SERVICES

No significant physical impacts on the environment can be identified as part of the evaluation of the proposed Community Plan because such an exercise is considered speculative pursuant to Section 15145.

CHAPTER 7.0

GROWTH INDUCEMENT

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could foster economic or population growth, or construction of additional housing, whether directly or indirectly. Induced growth is distinguished from the direct employment, population, or housing growth of a project. A project could induce growth by lowering or removing barriers to growth or by creating or allowing an amenity such as an industrial facility that attracts new population or economic activity.

The proposed Plans and Ordinances along with subsequent development would be considered growth-inducing. In fact, one of the primary goals of the proposed Plan is to induce growth in the downtown area. The role of the Plan in promoting the development of new residential and commercial uses downtown is consistent with the objectives of the Centre City Redevelopment Plan which is intended to bring about redevelopment and revitalization of the downtown area. Growth in the Centre City Redevelopment Project Area is considered a positive impact because it generates tax-increment and property tax revenues which can be used to further enhance the Redevelopment Project Area by allowing upgrades in infrastructure, development of affordable housing and other benefits. In addition, it maximizes the use of existing infrastructure including the opportunities for mass transit which are available in the downtown area.

Increasing the residential densities downtown could induce growth in the overall region because it would increase the overall housing stock available in the region above that assumed by current population forecasts which did not take the proposed plan into consideration.

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CHAPTER 8.0

EFFECTS FOUND NOT TO BE SIGNIFICANT

Based on the NOP dated April 1, 2003 (see Appendix 2.1), it was determined that the proposed Downtown Community Plan would not have a significant impact to the following: biological resources, mineral resources, and agricultural resources.

8.1 BIOLOGICAL RESOURCES

The downtown planning area is the urban core of San Diego and covers an area which serves high-rise commercial office, hotel and multi-family residential uses; major facilities such as Petco Park, the Convention Center, and the Civic Center; retail and entertainment centers including Horton Plaza, the Gaslamp District and Seaport Village; government and institutional uses; and, light industrial uses. This highly urbanized setting is almost entirely lacking in native vegetation and its associated wildlife. Ornamental trees, parkways, occasional lawns, and gardens comprise the only perennial vegetation within the downtown planning area. The value of these ornamentals to native wildlife are insignificant in their present location. Where vacant lots and exposed strips of soil are left undisturbed, weedy annual herbs and grasses have become established. Furthermore, no sensitive plant or animal resources have been identified within the downtown planning area due to its urbanized character. Thus, there would be no change to the diversity of species of plants and animals; reduction in the numbers of rare or unique plants or animals; introduction of new species; reduction in the acreage of an agricultural crop; or deterioration of existing habitats as a result of the proposed Downtown Community Plan.

As discussed Chapter 5.9, the proposed Plan would include a number of measures to control urban runoff effects on San Diego Bay. Thus, the proposed Plan would not result in significant impacts to marine plants and animals.

8.2 MINERAL RESOURCES

The downtown planning area has been urbanized since the early part of the 20th Century. The potential for viable extraction of mineral resources is limited due to the urbanized character of the area. Furthermore, the area has not been designated as having a high potential for mineral resources. Therefore, no impacts to mineral resources would occur as a result of the proposed Downtown Community Plan.

8.3 AGRICULTURAL RESOURCES

The downtown planning area does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designated by the California Department of Conservation. Furthermore, the area is not subject to nor is near a Williamson Act Contract pursuant to Section 51201 of the California Government Code. Therefore, no impacts to agricultural resources would occur with implementation of the proposed Downtown Community Plan.

CHAPTER 9.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

Section 15126.2(c) of the CEQA Guidelines requires the evaluation of impacts to nonrenewable resources that would be irreversible should the proposed Downtown Community Plan be implemented. Nonrenewable resources generally include: biological habitat, agricultural land, mineral deposits, water bodies, and some energy sources.

As discussed in Section 8.0, approval of the proposed Plans and Ordinances would not have any significant irreversible impacts on biological, agricultural or mineral resources. The downtown planning area is highly urbanized in character, and exhibits no natural vegetation. No agricultural soils occur within the planning area, and being urbanized, downtown would not be conducive to agricultural production. No significant mineral deposits underlie the planning area.

No water bodies occur within the downtown planning area. However, the San Diego Bay is located adjacent to the planning area. While water quality control measures implemented by the proposed Plans and Ordinances would minimize impacts, as discussed earlier, cumulative impacts from runoff pollutants would represent a significant irreversible impact to San Diego Bay.

Energy resources would be used during construction projects as the proposed Plan is implemented. Energy would also be consumed to provide lighting, heating and cooling for future development. The availability of mass transit in the planning area may serve to reduce consumption of gasoline associated with commute trips.

Construction projects resulting from implementation of the proposed Plan would require commitment of other nonrenewable resources associated with construction and long-term operation. These resources include, but are not limited to: lumber and other related forest products; sand, gravel and concrete; asphalt; petrochemical construction materials; steel, copper, lead, and other metals; and water. Use of these resources would represent an incremental effect on the regional consumption of these commodities.

In addition to the traditional nonrenewable resources discussed above, the impacts to some cultural and paleontological resources would be irreversible as well. Although the potential demolition of historic structures would be reduced through documentation prior to demolition, the loss of the buildings themselves would represent an irreversible impact. Similarly, impacts to important paleontological resources would be irreversible even though a salvage operation would mitigate the impact to below a level of significance.

CHAPTER 10.0

ALTERNATIVES

In considering the appropriateness of a proposed project, CEQA mandates that alternatives be discussed. Section 15126.6 of the State CEQA Guidelines requires the discussion of a range of reasonable alternatives to a project which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the proposed project. The Guidelines also require that the specific alternative of “no project” be evaluated along with its impact. When the project is the revision of an existing land use plan, the “no project” alternative is the continued implementation of the existing land use plan; in this case, the Centre City Community Plan. Section 15126.6 further states that "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice."

As discussed in Section 5.0, implementation of the proposed Community Plan could result in significant, direct environmental impacts related to air quality, cultural resources, land use, noise, paleontology, transportation/circulation, access and parking, as well as visual quality. As discussed in Section 6.0, the proposed Community Plan would result in significant cumulative impacts related to air quality, cultural resources, hydrology/water quality, noise, and traffic/circulation. In developing the alternatives to be addressed in this section, consideration was given regarding their ability to: 1) meet the basic objectives of the project, as discussed in Section 4.0, and 2) eliminate or substantially reduce significant environmental impacts, as identified in Sections 5.0 and 6.0 of this EIR. ~~As discussed in Section 5.0, implementation of the proposed Community Plan could result in significant, direct environmental impacts related to air quality, cultural resources, land use, noise, paleontology, transportation/circulation, access and parking, as well as visual quality. As discussed in Section 6.0, the proposed Community Plan would result in significant cumulative impacts related to air quality, cultural resources, hydrology/water quality, noise, and traffic/circulation.~~

As required by CEQA, this section considers the environmental impacts associated with implementing the adopted 1992 Community Plan which represents the No Project alternative.

Based on the comparison of the impacts associated with implementing the 1992 Plan with those of the proposed Community Plan contained in Section 10.1, it was determined that evaluation of an alternative which would reduce land use density and intensity to a level between the adopted and proposed Community Plan was not required. One of the key factors in this determination was the language of Section 15126.6 which indicates that an alternative should “substantially lessen any of the significant effects of the proposed project”. Due to the nature of the impacts, the primary consideration of alternatives is traffic as well as factors related to traffic, such as air quality.

Based on a comparison of the traffic impacts under the Proposed Plan versus the 1992 Plan, the traffic analysis concluded that, although some of the individual freeway segments would be less

~~impacted under the 1992 plan, the overall impact on the freeway system downtown would be significant and not mitigable under both the 1992 and Proposed Plan. Similarly, no substantial change would be expected with respect to air quality since the air quality analysis concludes that the automobile emissions would be reduced in subsequent years due to clean air requirements through the buildout of the downtown.~~

~~On the basis of the lack of overall reduction in traffic impacts, it was determined that a reduced density alternative would not meet the test of avoiding or substantially reducing traffic impacts and need not be considered in this EIR.~~

No other substantially different approaches to developing downtown were identified in the course of the extensive public outreach effort that took place during the preparation of the proposed Community Plan. The focus of issues expressed by members of the public at these meetings was on arts and culture aspects of downtown, and affordable housing. As no significant issues were identified with respect to these areas, a discussion of them is not required under CEQA relative to alternatives to the proposed project.

~~Based on the previously described criteria, the following alternative is considered in this section.~~

~~• No Project Alternative: Continued Implementation of Existing Centre City Community Plan.~~

Prior to selecting the land use plan which is the basis of the proposed Community Plan, three additional land use approaches were considered. Working Paper #7 identifies these three approaches as follows:

- Concentrated Office Core, Maximum Residential;
- Double Multi-use Cores, Expanded Residential Area; and
- Large Multi-Use Core, Waterfront Retail District.

~~These three land use plan concepts were developed by CCDC in the course of defining the land uses included in the proposed Community Plan. No discussion of these concepts is included in this section because they do not represent alternatives as defined by Section 15126 of the CEQA guidelines. None of these land use concepts would result in avoidance or substantial reduction in significant impacts associated with the proposed Plans and Ordinance.~~

~~A brief description of each of these approaches is provided in the discussion of Alternatives Considered But Rejected located at the end of this section. The approaches are identified in this section for the sake of completeness. They were developed prior to this EIR and, thus, were not generated as alternatives intended to minimize or avoid significant environmental impacts. Rather they were developed as a means of exploring various development approaches for downtown. The proposed Community Plan represents a blend of elements from all three initial land use approaches.~~

10.1 NO PROJECT ALTERNATIVE: CONTINUED IMPLEMENTATION OF EXISTING CENTRE CITY COMMUNITY PLAN (1992 PLAN)

Under this alternative, development within downtown would occur pursuant to the Centre City Community Plan that was originally adopted in 1992 including related Planned District Ordinances. As discussed in Section 5.1.1.4, the adopted Community Plan and Planned District Ordinances contain a series of goals, policies and regulations which are intended to promote a diverse mixture of land uses within downtown. As illustrated in Figure 10.1-1, the downtown area would be developed with a mixture of land uses.

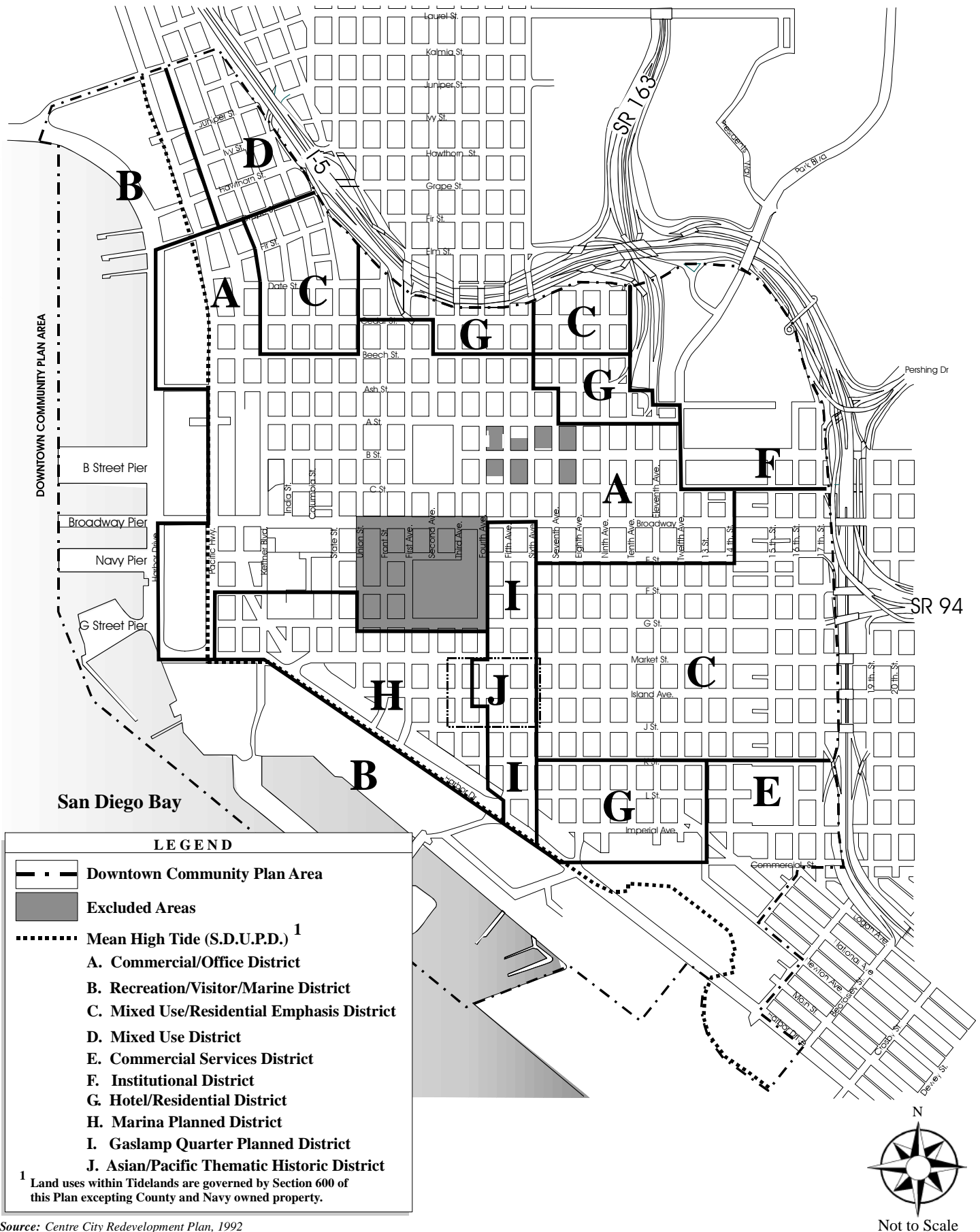
While implementation of the 1992 Plan would achieve the same general objectives as the proposed Community Plan, the 1992 Plan would have several notable differences. First, it would result in an overall reduced intensity of development. As illustrated in Table 10.1-1, the 1992 Plan would result in residential population buildout of 48,000 people, which is only 54% of that anticipated under the proposed Community Plan. Employment was emphasized in the 1992 Plan, but at buildout, would result in an employment population that is only 74% of that proposed by the new Plan. There are similar reductions for land uses such as residential, office, retail, and hotel. In addition, while the 1992 Plan focused on increasing the use of mass transit, with less reliance on automobiles and long-term parking downtown, it did not focus residential uses around neighborhood centers or designate green streets to promote pedestrian activity downtown. Finally, the 1992 Plan includes goals to create an urban park system downtown, but at buildout would result in fewer acres of park space compared to the proposed Plan.

The following discussion compares the potentially significant impacts of development in accordance with the 1992 Plan with the impacts associated with the proposed Community Plan. Table 10.1-2 provides a comparison of this alternative with the proposed Plans and Ordinances.

10.1.1 AIR QUALITY

10.1.1.1 Construction Emissions (AQ-A.1)

Dust and construction equipment emissions generated under the 1992 Plan would be comparable to those associated with the proposed Plans and Ordinance. As with the proposed Plan, dust and emission controls would be required which would reduce direct impacts to less than significant.



Source: Centre City Redevelopment Plan, 1992



1992 Community Plan Land Use Districts _____ Figure 10.1-1

**TABLE 10.1-1
Comparison of Buildout Condition under the 1992 Community Plan
and the Proposed Community Plan**

LAND USE/ DEMOGRAPHIC CATEGORY	1992 COMMUNITY PLAN BUILDOUT	PROPOSED COMMUNITY PLAN BUILDOUT
Population	48,000	89,100
Employment	117,000	167,700
Residential (units)	30,700	53,100
Office (s.f.)	20,700,000	22,028,000
Office (Civic) (s.f.)	NA	7,793,000
Culture and Education (s.f.)	NA	2,560,000
Retail (s.f.)	4,300,000	6,070,000
Hotel Rooms	15,600	20,000
Other	NA	2,780,000

10.1.1.2 Increase in mobile source emissions (AQ-C10.1.2.2 Increase in mobile source emissions (AQ-A.1)

As with the proposed Downtown Community Plan, implementation of the existing 1992 Plan would have significant cumulative impacts on regional air quality. However, due to the lower intensity of uses at buildout, the 1992 Plan would result in fewer automobile trips generated per day. This would result in fewer mobile source emissions compared to the proposed Community Plan. Therefore, there would be fewer stationary sources of air pollution from electrical power plants.

On the other hand, the No Project alternative would not implement the smart growth principals incorporated into the proposed Plans and Ordinances which are intended to reduce reliance on the private automobile, thereby reducing mobile source emissions.

10.1.2 ~~CULTURAL-HISTORICAL~~ RESOURCES

10.1.2.1 Impacts to ~~Historical-Architectural~~ Resources (~~CULHIST~~-A.1)

Implementation of the existing 1992 Plan could significantly impact sensitive ~~historical-architectural~~ resources, which occur throughout the downtown planning area. The 1992 Plan contains development incentives to encourage the restoration and renovation of designated historic sites, including floor area ratio exceptions, land use and property development exceptions, alternative building code provisions, and tax credits. The proposed Downtown Community Plan would carry these incentives over. However, potentially significant impacts could still occur despite the incentive programs. Therefore, there is no substantial difference between the 1992 Plan and the proposed Plan with respect to historic ~~architectural~~ resources.

**TABLE 10.1-2
Qualitative Comparison of the Environmental Effects of No Project (1992 Plan)
Relative to the Proposed Community Plan**

ENVIRONMENTAL ISSUE	PROPOSED COMMUNITY PLAN		NO PROJECT: 1992 PLAN	
	DIRECT	CUMULATIVE	DIRECT	CUMULATIVE
Air Quality (AQ)				
AQ-B.1 Construction Emissions	SM	SNM	SM (=)	SNM (=)
AQ-C.1 Mobile-source Emissions	NS	SNM	NS	SNM (-)
CULHIST Resources (CUL)				
CUL HIST-A.1 Impacts to Historical Architectural Resources	SNM	SNM	SNM (=)	SNM (=)
CUL HIST-B.1 Impacts to Archaeological Resources	SNM	SNM	SNM (=)	SNM (=)
Land Use (LU)				
LU-B.1 Ballpark Noise	SM	NS	SM (=)	NS
LU-B.2 Freeway Noise	SNM	NS	SNM (=)	NS
LU-B.3 Aircraft Noise	SNM	NS	SNM (=)	NS
LU-B.4 Railroad Noise	SNM	NS	SNM (=)	NS
LU-B.5 Ballpark Lighting	SM	NS	SM (=)	NS
LU-B.6 Transient Impacts	SNM	SNM	SNM (=)	SNM(=)
Noise (NOI)				
NOI-A.1 Traffic Noise Level Increase on Grid Streets	SNM	SNM	SNM (-)	SNM (-)
NOI-B.1 Interior Traffic Noise	SM	NS	SM (=)	NS
NOI-B.2 Interior Ballpark Noise	SM	NS	SM (=)	NS
NOI-C.1 Exterior Traffic Noise in Residential Development	SNM	NS	SNM (-)	NS
NOI-C.2 Exterior Aircraft Noise in Residential Development	SNM	NS	SNM (=)	NS
NOI-D.1 Exterior Traffic Noise in Public Parks and Plazas	SNM	NS	SNM (=)	NS
NOI-D.2 Exterior Aircraft Noise in Public Parks and Plazas	SNM	NS	SNM (=)	NS
Paleontological Resources (PAL)				
PAL-A.1 Impacts to significant paleontological resources during construction	SM	NS	SM (=)	NS
Traffic and Circulation (TRF)				
TRF-A.1.1 Impact on local streets	SNM	NS	SNM (-)	NS
TRF-A.2.1 Impact on freeways	SNM	NS	SNM (-)	NS
TRF-A.2.2 Impact from Removal of Cedar Street Off-ramp	SNM	NS	SNM (-)	NS
TRF-D.1 Excessive parking demand	SNM	NS	SNM (-)	NS
Visual Quality (VIS)				
VIS-B.1 Disruption of views of San Diego Bay and San Diego-Coronado Bay Bridge from Balboa Park and Highway	SNM	NS	SNM (-)	NS
Water Quality (WQ)				
WQ-A Surface Water Pollution	NS	SNM	NS	SNM (=)

NA: Not Applicable
 NS: Not Significant
 SM: Significant but mitigable
 SNM: Significant and not mitigable

(=) Impact essentially equivalent to proposed Community Plan
 (+) Impact greater than proposed Community Plan
 (-) Impact less than proposed Community Plan

10.1.2.2 Impacts to Archaeological Resources (~~CUL~~HIST-B.1)

Future development under the existing 1992 Plan is expected to occur in areas that possess moderate to high potential for archaeological resources. Grading associated with construction in these areas could significantly impact sensitive archaeological resources despite resource recovery plans. As similar impacts could also occur under the proposed Plan, there would be no substantial difference between the two plans.

10.1.3 LAND USE COMPATIBILITY

10.1.3.1 Ballpark Noise (LU-B.1)

New development within four blocks of the ballpark would continue to be potentially impacted by ballpark noise. Thus, as with the proposed Plan, significant noise impacts could occur on future noise sensitive uses.

10.1.3.2 Traffic Noise (LU-B.2)

As with the proposed Plan, the existing 1992 Plan would allow additional residential development in areas impacted by traffic noise. Thus, under either plan, significant traffic noise impacts would occur on noise-sensitive land uses allowed within the 65 dB(A) CNEL contour of freeways or grid streets. Due to the lack of specific information on the potential location and intensity of noise sensitive uses within the area impacted by traffic noise, no quantitative analysis can be made as to the number of persons potentially exposed to high noise levels under the two Plans.

10.1.3.3 Aircraft Noise (LU-B.3)

As with the proposed Plan, the existing 1992 Plan would allow additional residential development in areas impacted by aircraft operations associated with the San Diego International Airport. Thus, under either plan, significant aircraft noise impacts would occur on noise-sensitive land uses allowed within the 65 dB(A) CNEL contour. Due to the lack of specific information on the potential location and intensity of noise sensitive uses within the area impacted by aircraft noise, no quantitative analysis can be made as to the number of persons potentially exposed to high noise levels under the two Plans.

10.1.3.4 Railroad Noise (LU-B.4)

As future noise sensitive development constructed in accordance with the 1992 Plan would face similar noise impacts from railroad operations, the impacts under the 1992 Plan would be significant.

10.1.3.5 Ballpark Lighting (LU-B.5)

New development within two blocks of the ballpark would continue to be potentially impacted by ballpark lighting. Thus, as with the proposed Plan, significant noise impacts could occur on future light sensitive uses.

10.1.3.6 Transient Impacts (LU-B.6)

As with the proposed Plan, continued development would be expected to displace homeless individuals which occur in less active areas within downtown which are favored by the homeless population. As a result, a similar pressure would be created for homeless individuals to move into canyons and less active areas within surrounding neighborhoods.

10.1.4 NOISE

10.1.4.1 Traffic Noise Level Increase (NOI-A.1)

New development in accordance with the 1992 Plan would increase noise levels on the grid streets due to increased traffic volumes. Although the traffic increase would be proportionately less due to the lower land use intensity, the 1992 Plan would result in significant noise level increases on grid streets.

10.1.4.2 Interior Traffic Noise (NOI-B.1)

As with the proposed Plans and Ordinance, future noise sensitive uses could be exposed to exterior traffic noise levels which would cause interior noise levels to exceed 45 dB(A) CNEL without special noise attenuation.

10.1.4.3 Interior Ballpark Noise (NOI-B.2)

As with the proposed Plans and Ordinance, future noise sensitive uses could be exposed to exterior event noise levels within four blocks of the ballpark which would cause interior noise levels to exceed 45 dB(A) CNEL without special noise attenuation.

10.1.4.4 Exterior Traffic Noise in Residential Development (NOI-C.1)

As with the proposed Plans and Ordinance, it may not be feasible to protect all required outdoor open space associated with residential development from traffic noise in excess of 65 dB(A) CNEL. Thus, the No Project could result in significant impacts on required outdoor recreation areas in residential development.

10.1.4.6 Exterior Aircraft Noise in Residential Development (NOI-C.2)

As with the proposed Plans and Ordinance, it may not be feasible to protect all required outdoor open space associated with residential development from aircraft noise in excess of 65 dB(A) CNEL. Thus, the No Project could result in significant impacts on required outdoor recreation areas in residential development.

10.1.4.7 Exterior Traffic Noise in Public Parks and Plazas (NOI-D.1)

As with the proposed Plans and Ordinance, it may not be feasible to protect all recreational areas in public parks and plazas from traffic noise in excess of 65 dB(A) CNEL. Thus, the No Project could result in significant impacts on these uses.

10.1.4.8 Exterior Aircraft Noise in Residential Development (NOI-D.2)

As with the proposed Plans and Ordinance, it may not be feasible to protect all recreational areas in public parks and plazas from aircraft noise in excess of 65 dB(A) CNEL. Thus, the No Project could result in significant impacts on these uses.

10.1.5 PALEONTOLOGICAL RESOURCES

10.1.5.1 Impacts to significant paleontological resources during construction (PAL-A.1)

Future development downtown under the existing 1992 Plan is expected to occur in areas which possess high fossil-bearing potential. Thus, as with the proposed Plan, grading associated with construction in these areas could significantly impact important paleontological resources.

10.1.6 TRANSPORTATION CIRCULATION/ACCESS AND PARKING

Overall, the 1992 Plan would generate approximately 588,000 (28%) fewer daily person trips than the proposed Plan. The 1992 Plan would also generate approximately 298,000 (or about 24%) less vehicle trips on a daily basis than the proposed Plan.

Although the 1992 Plan would generate less overall trips, it would not achieve the increase the overall percentage of person trips that would be expected to use alternate forms of transit that would occur under the proposed Plan. As indicated in the traffic study, the proposed Downtown Community Plan, when compared with the 1992 Plan, would result in increased use of alternative modes as follows:

- 40% increase in daily non-motorized trips, including walk, bicycle, and pedicab modes;
- 28% increase in daily carpool trips; and
- 30% increase in daily transit trips.

10.1.6.1 Impact on Grid Streets (TRF-A.1.1)

Although significant impacts would occur on downtown intersections under the 1992 Plan, less intersections would be impacted due to the reduced traffic volume increase. Twenty-seven

signalized intersections would operate at LOS F under the 1992 Plan. This compares with a total of 62 deficient intersections under build-out of the proposed Downtown Community Plan. Under the 1992 Plan, 11 intersections would fail in the AM peak hour; 19 intersections would fail in the PM peak hour; with 4 intersections identified as failing in both the AM and PM peak hours.

10.1.6.2 Impact on Surrounding Streets (TRF-A.1.2)

As with the proposed Plan, future development downtown would create additional traffic on surrounding streets. Although the traffic volumes would be somewhat less, a number of segments would be expected to experience LOS F conditions. Thus, development under the 1992 Plan would result in significant impacts to surrounding streets.

10.1.6.3 Increased Freeway Traffic (TRF-A.2.1)

Freeway segment volumes would generally range from 5,000 to 15,000 ADT lower than under the proposed Downtown Community Plan. Performance of the downtown area freeway segments under build-out of the proposed Downtown Community Plan and the 1992 Plan would generally be similar, with no change in the number of segments operating at LOS F, with the exception of the following:

- I-5 from Pershing to SR-163 would improve to LOS E in the AM southbound direction under the 1992 Plan; and
- I-5 from Sixth Avenue to First Avenue would improve to LOS E in the PM southbound direction under the 1992 Plan.

Performance of the downtown area freeway ramps under build-out of the proposed Downtown Community Plan and 1992 Plan would generally be similar, with no change in the number of ramps operating at LOS F, with exception of the following:

- I-5 NB on-ramp from 19th Street would improve to LOS E during the PM peak hour under the No Project alternative. SR-94 EB on-ramp from 19th Street improves to LOS C during AM peak hour under the 1992 Plan;
- I-5/SR-163 SB off-ramp to 10th Avenue would improve to LOS E during AM peak hour under the 1992 Plan; and
- SR-163 SB off-ramp to Fourth Avenue would improve to LOS C under the 1992 Plan.

10.1.6.4 Elimination of Cedar Street Off-ramp (TRF-A.2.2)

Development in accordance with the 1992 Plan would avoid the freeway impacts associated with elimination of the Cedar Street off-ramp because the 1992 Plan does not propose elimination of this off-ramp.

10.1.6.5 Excessive Parking Demand (TRF-D.1)

As with the proposed Plan, future development downtown would create additional demand for parking which may not be accommodated by planned parking facilities within downtown. Consequently, as with the proposed Plan, downtown employees and residents may seek parking in surrounding neighborhoods creating potentially significant impacts.

10.1.7 VISUAL QUALITY

10.1.7.1 Disruption of views of San Diego Bay and San Diego-Coronado Bay Bridge from Balboa Park and Highway 94 (VIS-B.1)

Like the Downtown Community Plan, the 1992 Plan would encourage development of residential uses in East Village. However, the 1992 Plan would not result in as high an intensity of residential uses in these areas. It can not be predicted whether buildout of the 1992 Plan would result in high rises that would disrupt views of San Diego Bay and the San Diego-Coronado Bay Bridge from Balboa Park and Highway 94; the 1992 Plan did not specifically address views from these locations. Regardless, these public vantage points are not protected by the 1992 Plan; therefore, view impacts are potentially significant as they would be under the proposed Plan.

~~10.2 ALTERNATIVES CONSIDERED BUT REJECTED~~

~~10.2.1 CONCENTRATED OFFICE CORE, MAXIMUM RESIDENTIAL~~

~~10.2.1.2 Overview~~

~~Under this land use approach, the vast majority of new office development would be directed to the existing office core by increasing the allowable FAR. Residential uses would predominate in the rest of downtown in addition to support retail. Residential would be concentrated in specific high density nodes with densities lessening around these nodes.~~

~~High intensity office development would be concentrated in a compact but intense quarter mile radius district, similar in overall size to successful financial districts of other major American downtowns. This alternative would build on the existing cluster of tall office buildings and reinforces existing civic uses.~~

~~Residential uses would be maximized in remaining areas, with very high density nodes occurring around the junction of Market Street and Park Boulevard in East Village, and in Cortez, and decreasing densities moving away from these concentrations.~~

The waterfront would be lined with residences on the Navy Broadway Complex and a mix of office and hotel buildings from Ash to Broadway, all keeping within overall volumes envisioned by the North Embarcadero Visionary Plan.

Retail uses would occur at ground level within the office core to support business and other needs. In residential zones, multi-use corridors would be established within a five-minute walk of most residences. They would contain support retail and office spaces on the first one or two floors and place residential uses above.

Two multi-block parks in north and south East Village would be located convenient to new residents, reinforcing the Park to Bay link. Another large open space would be located on a lid bridging the I-5 freeway, between Cortez Hill and Balboa Park. Broadway would acquire a ceremonial, boulevard character in the stretch from the waterfront to a new large gathering space near the civic uses, and a predominantly pedestrian character from the civic space to Fifth Avenue. Market Street, Park Boulevard, Sixth Avenue, and Ash Street would also be identified for special landscape treatment. Residential development would occur at a variety of densities, ranging in types from four-story buildings to skyscrapers, with an average of about 200 units per acre.

Under this alternative, downtown San Diego's population would exceed 80,000 by buildout at 2025. Hotel rooms would double, while office space would increase by about 15 million s.f. to nearly 24 million s.f. Just over half the office space would be in the Core/Broadway area, the rest would be along the waterfront, in the civic center, or in the neighborhood mixed-use centers.

10.2.1.2 Basis for Rejection

This land use approach was rejected because it failed to achieve the primary goal of creating a development pattern which would result in a vibrant development pattern encouraging 24-hour activities throughout the week. Focusing office development in the existing core could discourage residential and retail uses which are responsible for activating areas outside the normal working hours. In addition, the plan offered insufficient number and diversity of mixed-use neighborhood centers, and related opportunities for shared parking, synergistic activities, and transit/pedestrian circulation.

In addition to the adverse impact on the existing core, centralizing office space would diminish the goal of providing employment opportunities near residential uses to promote walking and discourage community commuting outside of the downtown area. In addition, office workers distributed throughout downtown could help the economic viability of retail uses in areas outside of the existing core.

The uses proposed along the waterfront could be incompatible with the land use regulations governing tidelands.

~~10.2.2—DOUBLE MULTI-USE CORES, EXPANDED RESIDENTIAL AREA~~

~~10.2.2.1—Overview~~

~~This alternative approach would result in an expanded core area which would also have more emphasis on mixed uses including residential. As a result, residential development would be distributed throughout the entire community plan area.~~

~~Rather than a concentrated office core, two less intense multi-use cores would occur within the Core and Columbia neighborhoods. In Core, residential uses would mix with offices; while in Columbia the mixed use would consist of office, residential, and hotel uses.~~

~~Very high density residential development would be located near these cores, with low to high density residential development throughout the rest of downtown. East Village would be a series of residential neighborhoods clustered around parks and commercial cores. Both the existing municipal bus yard and the rail switching yards would be relocated, creating a new neighborhood with a street grid connecting Barrio Logan to downtown.~~

~~Two arts and culture districts would be created with one beginning in Cortez along Fifth Avenue and crossing into Uptown on a lid over I-5, providing a connection to Balboa Park. The other would be gathered around the new library site and ballpark. An elementary school would occupy up to three blocks in the East Village.~~

~~Open space would be concentrated in two linear configurations. A seven block park would run along the north side of A Street from Front Street to Harbor Drive, serving the Columbia and Little Italy neighborhoods and providing water vistas. A five block strip of half block parks would run between F and K Streets in the East Village. The strip would terminate in a much larger open spaces on its north and south ends, providing recreational centerpieces to under served East Village neighborhoods. A triangular park in the south of East Village would serve as the focus of a multi-use center of the new neighborhood created by relocation of the rail yards.~~

~~Multi-use corridors with ground level retail and offices and residential uses above, would serve the various neighborhoods in this option, with clusters along India Street in Little Italy; Union Street in Columbia; Ash Street in Cortez; and Eleventh Avenue, Market Street, and Imperial Avenue in East Village.~~

~~Hotels would line the waterfront north of Broadway, and be interspersed with residential and office uses in the Columbia multi-use core.~~

~~Boulevards or streets with special landscape treatment would include A Street, Broadway, Market Street, Fifth Avenue, Park Boulevard, and Imperial Avenue.~~

~~Some new residential development would be in skyscrapers, but a large portion (20 percent) would occur in lower rise (less than six story) residential developments, with an overall average of 180 units per acre.~~

~~10.2.2.2 Basis for Rejection~~

~~Similar to the previous alternative, this land use approach was rejected because it failed to achieve the primary goal of creating a development pattern which would result in a vibrant development pattern encouraging 24-hour activities throughout the week. Focusing office development in the a single area could discourage residential and retail uses which are responsible for activating areas outside the normal working hours. In addition, the alternative offered insufficient mixed-use neighborhood centers.~~

~~In addition centralizing office space would diminish the goal of providing employment opportunities near residential uses to promote walking and discourage community commuting outside of the downtown area.~~

~~This alternative also lacked major open space features for active recreational pursuits and larger gatherings.~~

~~10.2.3 LARGE MULTI-USE CORE, WATERFRONT RETAIL DISTRICT~~

~~10.2.3.1 Overview~~

~~Under this alternative, downtown would be composed of a very large multi-use core of varying intensities, similar to the existing one, with growing residential neighborhoods in Little Italy, Cortez, and East Village. A new waterfront multi-use district would extend between Harbor Drive and Pacific Highway, north of Broadway. Retail and other active uses, serving local residents and visitors, would be located at the ground level, while hotels and offices occupy the upper floors in this enlarged core.~~

~~A mix of residential and commercial uses would occupy the Navy Broadway Complex (located south of Broadway), but without a particular retail focus. Development intensities peak in the current Core district, would gradually step down toward the waterfront at the Broadway terminus, and toward Cortez Hill and East Village.~~

~~A strong emphasis would be placed on important corridors running through downtown: Broadway, Fifth Avenue, Park Boulevard, and Market Street. Ground-level retail and office uses would reinforce the corridors, with clusters at either end of Broadway and the north end of Fifth Avenue.~~

~~A five-block portion of Market Street would be reconfigured with a linear parkway fronted by active retail uses forming a focus for the East Village neighborhood as well as for the corridor itself. Parks would anchor Broadway at Eleventh Avenue, and a small park would be located at the south end of Fifth Avenue. A freeway lid would run from Second to Sixth Avenues would also serve as a park. An arts and cultural district would be located around Park Boulevard, C Street, and Broadway, forming a link between downtown and routes to Balboa Park in the north. A new elementary school would be located in East Village.~~

~~Hotels would be built throughout the multi-use core, and would be mixed with residential uses in the vicinity of the ballpark. Low rise offices, light industry, and residential uses would be located in Little Italy and East Village, following existing trends. Southern portions of East Village, as well as some small stretches of downtown along the I-5 freeway, would retain industrial uses, and may also accommodate social services. The bus yard and the railroad maintenance yards would remain.~~

~~10.2.3.2 Basis for Rejection~~

~~This alternative would not foster the intensification goals and policies of the City of Villages Framework Plan. As with the previous two alternatives, this plan would preclude the benefits of smaller neighborhood villages. As with the first alternative, this plan could also conflict with the land policies adopted by the Port Authority for state tidelands. With respect to the goal of accommodating future office development, this alternative would not adequately protect future office use opportunities in downtown.~~

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CHAPTER 11.0

REFERENCES

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CHAPTER 12.0

INDIVIDUALS AND ORGANIZATIONS CONSULTED

Bryden, Joel H.	Captain, Central Division Office of the Chief of Police City of San Diego
Johnson, Sharon	Homeless Services Administrator Community and Economic Development Department City of San Diego.
Moshavegh, Feryal	Associate Civil Engineer Water Policy CIP Finance and Planning Division Water Department
Mullins, Angelee	Recycling Specialist Environmental Services Department City of San Diego
Nguyen, Huy	Associate Civil Engineer Engineering and Program Management Division Metropolitan Wastewater
O'Beirne, Kevin	Regulatory Case Management San Diego Gas & Electric Company 8330 Century Park Court San Diego, CA 92123
Oates, Samuel L.	Fire Marshal Fire and Hazard Prevention City of San Diego

Rynerson, Charles	Demographer San Diego City Schools
Sannwald, William W.	Library Design and Development Manager San Diego Public Library City of San Diego
Wilson, Leonard	Senior Civil Engineer CIP Program Management Division Water Department

CHAPTER 13.0

CERTIFICATION PAGE

This Environmental Impact Report was prepared by Project Design Consultants in cooperation with the technical consultants and public agency staff identified below. The qualifications of key PDC staff and technical specialists are described at the end of this section. The following professional staff participated in its preparation:

Centre City Development Corporation

Garry Papers, Manager of Architecture & Planning
Brad Richter, Principal Planner
Alexandra Elias, Senior Planner
Beverly Schroeder, Senior Planner

San Diego, City of

Bob Manis, Assistant Deputy Director, Land Development Review Division
Chris Zirkle, Former Assistant Deputy Director, Land Development Review Division
Linda Marabian, Senior Traffic Engineer, Planning Department
Martha Blake, Senior Planner, Environmental Analysis Section
Anne Heyne, Senior Planner, Environmental Analysis Section
Charles Richmond, Associate Planner, Environmental Analysis Section

Project Design Consultants

M. Bruce McIntyre, Principal
D. Seán Cárdenas, R.P.A., Associate
Ellery Foster, Environmental Planner
Melyssa Duggan, Environmental Planner
Chris Knopp, Environmental Planner
Mike Blackburn, Graphic Artist
Michele Edmonds, Word Processor

McAteer & McAteer

Theresa McAteer, Attorney at Law

Kane, Ballmer & Berkman

Murray Kane, Attorney at Law
Susan Apy, Attorney at Law

Dyett & Bhatia, Urban and Regional Planners

Rajeev Bhatia, Principal and Project Manager
Joan Isaacson, Deputy Project Manager
Jenny Johnston, Project Planner

Giroux & Associates

Hans D. Giroux, President

Wilson & Company

Mark Peterson, Transportation Group Director

Daniel Marum, Senior Transportation Planner

Stephen Pouliot, Senior Traffic Engineer

Cultural Resources -- Historic

Marie Burke Lia, Attorney at Law

ASM Affiliates, Inc

Jerry Schaefer, Senior Archaeologist

PDC Staff Qualifications Summary

Bruce McIntyre served as the Principal-in-Charge and Project Manager for the EIR. Mr. McIntyre has over 25 years of environmental analysis and resource management experience. His academic credentials consist of a Bachelor of Science degree in Zoology and a Master of Science degree in biology. Mr. McIntyre's experience includes a variety environmental areas including: management and preparation of Environmental Impact Reports; preparation and implementation of mitigation monitoring and reporting programs; preparation of candidate findings; and wildlife agency coordination and permit processing. He has lectured at various Association of Environmental Professionals (AEP) Statewide conferences, has held office at the local-level of AEP and has represented the AEP on a statewide blue-ribbon task force to update CEQA. Mr. McIntyre's project experience includes the preparation and/or management of the following environmental documents: Subsequent EIR for the Ballpark and Ancillary Development Projects (Centre City); EIR for Mission City Specific Plan (Mission Valley); Supplemental EIR for Otay Ranch Sectional Plan Area One (Chula Vista); Program EIR for the Lemon Grove General Plan (Lemon Grove); and Program EIR for the Santee General Plan Update (Santee).

Seán Cárdenas assisted in the preparation of the EIR with a special focus on historical resources. Mr. Cárdenas has over 24 years experience in the environmental consulting field. He has served as environmental analyst in the public sector as well as in the private sector. His academic experience includes a Bachelor and Master of Arts in Anthropology. In addition, Mr. Cárdenas is a Registered Professional Archaeologist. He has over 25 years experience in the environmental consulting field, with project management experience on numerous complex projects such as the SUHSD High School No. 13 EIR (Sweetwater Union High School District), County Administration Center Waterfront Park Master Plan EIR (County of San Diego), San Diego International Airport Master Plan 2020 EIR (Port of San Diego), and Calexico International Center Master Plan Program EIR (City of Calexico). He has also been responsible for a full range of public infrastructure and private development project environmental documents.

Melyssa Duggan assisted in the preparation of the EIR. Ms. Duggan has over five years of experience in the environmental field, with specialization in the preparation of CEQA documents. Ms. Duggan has a Bachelor of Science degree in Environmental Studies and a Master of Science degree in Public Administration. Her experience includes one year working in the Planning Department of the City of Santa Barbara where she worked on the redevelopment of a student neighborhood on the UC Santa Barbara campus as well as assisting in the preparation of mitigated negative declarations for various projects. As an environmental planner, Ms. Duggan has worked on a variety of projects including EIRs for following projects: University City Transportation Corridor Study, Monte Verde, and La Jolla Centre III/IV. All of which involve development in urban areas.

Chris Knopp assisted in the preparation of the EIR. Mr. Knopp has over four years of experience in the environmental field. Mr. Knopp has a Bachelor of Arts degree in Environmental Science, International Relations and Political Science. Relevant project experience includes the San Dieguito Lagoon Restoration, University City North/South Corridor, Sycamore Creek Estates, and Sweetwater Union High School District High School 13.

Ellery Foster assisted in the preparation of the EIR. Ms. Foster has two years of experience in the environmental field. Ms. Foster has a Bachelor of Arts in Environmental Science and Policy and a Master of Science degree in Environmental Management.

Wilson & Company Staff Qualifications Summary

Mark E. Peterson supervised the preparation of the traffic study. Mr. Peterson has more than 26 years of experience, including over 10 years in various capacities with Municipalities and Metropolitan Planning Organizations (MPOs). He has a Bachelor of Science degree in Resource Economics and a Master of Science degree in Urban Planning. He has specific experience and expertise in the areas of multimodal transportation planning, travel demand forecasting, circulation planning for major activity centers, and traffic impact assessment. He has conducted numerous multimodal transportation corridor studies throughout the United States and is experienced in a variety of modes including commuter rail, light rail and BRT applications. Mr. Peterson directed all transportation related EIR analyses for the San Diego Downtown Ballpark, managed the Central I-5 Corridor Study and recently completed the EIR transportation assessment for the update of the Downtown Community Plan.

Daniel Marum provided technical input into the traffic study. He has a Bachelor of Science degree in Business Administration and Urban Geography. He has more than 24 years of experience and background in long-range transportation planning, congestion management analysis, multi-modal corridor planning, access management studies, traffic impact analysis, parking/circulation evaluations and national research projects. His responsibilities include management of comprehensive planning studies and traffic circulation analyses. He served as lead transportation planner for the EIR traffic assessment of the Downtown San Diego Ballpark and the Central I-5 Corridor Study.

Stephen Pouliot served as lead traffic engineer for the update of CCDC's Downtown Community Plan. He has a Bachelor of Science degree in Engineering and a Master of Science degree in Transportation Engineer and is a registered Professional Engineer. He has thirteen years of overall transportation engineering and planning experience. His transportation engineering experience includes: operations analysis for urban roadways, highways, and transit systems; roadway and rail system alignment analysis; traffic impact studies; access studies; parking analysis; and the development of highway incident management programs.

Marie Burke Lia, Attorney at Law

Marie Burke Lia provided the analysis of the historical resources downtown and evaluated impact potential. She has 33 years of experience in law with a specialty in handling historic property legal matters. She has a Bachelor of Arts degree in Political Science and History and a Juris Doctorate degree. In the first nine years of her career, she was a Deputy City Attorney for the City and County of San Francisco. Since opening her own law office in 1982, she has handled more than two hundred historic property legal matters for private and public property owners. She has served as a consultant to the San Diego Redevelopment Agency and the San Diego Unified Port District. She has also served as a historic property consultant to the cities of San Diego, Oceanside, Santee, Coronado, Encinitas, Fresno, Vista, Riverside, National City and Chula Vista, as well as the State Department of Parks and Recreation and the U.S. Navy.

Giroux Associates Staff Qualifications Summary

Hans Giroux has over 20 years of professional experience. He has prepared air quality impact assessments for a wide variety of industrial, commercial, residential, transportation system and planning projects. He has a Bachelor of Science and Master of Science degree in meteorology. Commercial and residential projects include business parks, government centers, residential subdivisions, redevelopment projects, mixed use projects, hospitals, and recreational projects. Transportation-related projects include: roadway and highway projects, transit systems, and airports. Air quality analyses include impacts associated with gasoline motor emissions, toxic air emissions, asbestos, dust and particulates as well as odors and nuisance. He has performed numerous air quality conformity analysis for consistency with state and federal air quality planning guidelines. Recent downtown/port area projects completed by Mr. Giroux include the North and South Embarcadero Redevelopment Plans, the Convention Center Expansion and the proposed Ballpark and Ancillary Development Projects.

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RESPONSES TO COMMENTS

RESPONSES TO COMMENTS

The Draft EIR for the proposed project was originally circulated for public review and comment between July 28, 2005 and September 12, 2005. During this review period, CCDC received comments from interested agencies, organizations and individuals concerning the document. A copy of each comment letter received by CCDC along with corresponding responses is included in this section. The individual comments and the corresponding responses have each been given an Alpha-numeric reference.

The following is a list of agencies and other interested parties that submitted comments on the Draft EIR during the review period for the Draft EIR.

Letter From	Response Numbers
<u>State Agencies</u>	
California State Clearinghouse, Governor's Office of Planning and Research, Scott Morgan, Senior Planner Dated 8/1/05	1.1
California State Clearinghouse, Governor's Office of Planning and Research, Terry Roberts, Director Dated 9/13/05	2.1
California State Clearinghouse, Governor's Office of Planning and Research, Terry Roberts, Director Dated 9/14/05	3.1 – 3.2
California Coastal Commission, Diana Lilly, Coastal Planner Dated 9/12/05	4.1 – 4.5
CALTRANS, District 11, Mario H. Orso, Chief, Development Review Branch Dated 9/12/05	5.1 – 5.31

Letter From**Response Numbers****Local Agencies**

San Diego Association of Governments, Bob Lieter, Director of Land Use and Transportation Planning Dated 9/12/05	6.1
San Diego, City of, Deborah Sharpe, Project Office II, Park and Planning Division, Park and Recreation Department Dated 9/12/05	7.1 – 7.8
San Diego, City of, Linda J. Marabian, Senior Traffic Engineer Dated 9/1/05	8.1 – 8.12
San Diego, City of, Marta Williams, Program Manager, San Diego Police Department Facilities Management and Development Unit Dated 9/12/05	9.1 – 9.2
San Diego, County of, Air Pollution Control District, Andy Hamilton, Air Quality Specialist Dated 9/2/05	10.1 – 10.2
San /Diego, County of, Office of Education, Robert W. Nicholson, Senior Director, Facility Planning Services Dated 8/22/05	11.1 – 11.3
San Diego, County of, Regional Airport Authority, Angela Shafer-Payne, Vice President, Strategic Planning Dated 9/12/05	12.1 – 12.7
San Diego Gas and Electric, Christopher P. Terzich, REA, Principal Environmental Specialist, Land Planning Dated 9/9/05	13.1

Organizations

BNSF Railway Company, Alicen Clark Wong, of Gresham Savage, Nolan and Tilden Dated 9/12/05	14.1 – 14.6
Center on Policy Initiatives, Murtaza H. Baxamusa, AICP Dated 9/12/05	15.1 – 15.7

Letter From	Response Numbers
Citizens Coordinate for Century 3, Bruce H. Warren, President Dated 9/12/05	16.1 – 16.8
Environmental Health Coalition, Randa Baramki, Co-Director Toxic-Free Neighborhood Campaign Dated 9/12/05	17.1 – 17.14
Industrial Environmental Association, Patti Krebs, Executive Director Dated 9/12/05	18.1 – 18.19
San Diego Chinese Historical Society & Museum, Michael Yee, President Dated 9/12/05	19.1 – 19.3
San Diego, County of, Archaeological Society, Inc. James. W. Royle, Jr., Chairperson, Environmental Review Committee Dated 9/10/05	20.1 – 20.3
San Diego Downtown Residents Group, Gary Smith, President Dated 9/12/05	21.1 – 21.5
San Diego & Imperial Valley Railroad Company, Douglas Verity, General Manager 9/4/05	22.1 – 22.8
Save Our Heritage Organization, Bruce Coons, Executive Director Dated 9/9/05	23.1 – 23.4
<u>Individuals</u>	
Collier, Boyd, PhD. Dated 9/12/05	24.1 – 24.4
Jones, Donna, Representing Trammell Crow Residential Dated 9/12/05	25.1 – 25.6
Keagy, Roscoe D., Representing Smart & Final Stores Dated 9/12/05	26.1 – 26.2
Peterson, Matthew A., Representing Ghods Builders, Inc. Dated 9/12/05	27.1
Peterson, Matthew A., Representing Ace Parking Management, Inc. Dated 9/12/05	28.1
Sung, Amy, Ph.D. Dated 9/10/05	29.1



Arnold Schwarzenegger
Governor

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



Sean Walsh
Director

Memorandum

Date: August 1, 2005
To: All Reviewing Agencies
From: Scott Morgan, Senior Planner
Re: SCH # 2003041001
San Diego Downtown Community Plan, Centre City Planned District
Ordinance and Redevelopment Plan for the Centre City Project Area

The State Clearinghouse forwarded the above-mentioned project to your agency for review on July 28, 2005 with incorrect review dates. Please make note of the following information for your files:

Review period began: July 28, 2005
Review period ends: September 12, 2005

We apologize for any inconvenience this may have caused. All other project information remains the same.

cc: Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

CENTRE CITY
DEVELOPMENT
CORPORATION

AUG 08 2005
Orig. To: _____
Copy To: _____

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

1.1

1.1 No response is required.

Form A
Notice of Completion & Environmental Document Transmittal SCH # 2003041001

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-7044 (916)445-4963

Project Title: San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area

Lead Agency: City of San Diego Redevelopment Agency **Contact Person:** Alexandra Elias
Mailing Address: 228 Broadway, Suite 1100 **Phone:** (619) 235-2200
City: San Diego **Zip:** 92101 **County:** San Diego

Project Location:
 County: San Diego **City/Nearest Community:** San Diego
 Cross Street: Interstate 5 and Highway 163 **Zip Code:** 92101 **Total Acres:** 1.455
 Assessor's Parcel No. Not Applicable **Section:** **Top:** **Range:** **Range:** **Base:**
 Within 2 Miles: State Hwy #: 163 **Waterways:** San Diego Bay **Railways:** BNSF, NCTD, MTS **Schools:** San Diego High School
 Airports: San Diego International

Document Type:
 CEQA: NOP Supplement/Subsequent EIR NEPA NO Other: Joint Document Final Document Other
 Early Cons (Prior SCH No.) Draft EIS Final Document
 Neg Dec Other Other
 Final EIR

Local Action Type:
 General Plan Update Specific Plan Rezoning Association Redevelopment
 General Plan Amendment Master Plan Use Permit Conditional Permit
 General Plan Element Planned Unit Development Land Division (Subdivision, etc.) Other
 Community Plan Site Plan

Development Type:
 Residential: Units _____ Acres _____ Water Facilities: Type _____ MGD _____
 Office: Sq Ft _____ Acres _____ Employees _____ Transportation: Type _____ Sewer Capacity _____
 Commercial: Sq Ft _____ Acres _____ Employees _____ Mining: Mineral _____
 Industrial: Sq Ft _____ Acres _____ Employees _____ Power: Type _____ Waste _____
 Educational _____ Waste Treatment: Type _____
 Recreational _____ Hazardous Waste: Type _____
 Other _____

Funding (approx.): Federal \$ _____ State \$ _____ Total \$ _____

Project Issues Discussed in Document:
 Aesthetic/Visual Flood Plain/Flooding Schools/Universities Water Quality
 Agricultural Land Forest Land/Fire Hazard Scape Systems Water Supply/Groundwater
 Air Quality Geologic/Seismic Sewer Capacity Wetlands/Riparian
 Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wetlands
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Abstraction Population/Housing Balance Toxic/Hazardous Land Use
 Economic/Job Public Services/Facilities Traffic/Circulation Cumulative Effects
 Fiscal Recreation/Parks Vegetation Other _____

Present Land Use/Zoning/General Plan Designation:
 The Centre City Plan area is planned for a variety of urban uses including office, residential, retail, hotel, industrial and civic.

Project Description:
 The project consists of a series of revisions to the planning documents which govern downtown San Diego. The following documents would be amended: San Diego Downtown Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Project Area. January 2004

State Clearinghouse Contact: (916) 445-0613

State Review Began: 7-28-2005

SCH COMPLIANCE 9-12-2005

Please note State Clearinghouse Number (SCH#) on all Comments
 SCH#: 2003041001
 Please forward late comments directly to the Lead Agency

AQMD/APCD 27
 (Resources: 7, 30)

- Project Sent to the following State Agencies**
- Resources
 - Boating & Waterways
 - Coastal Comm
 - Colorado Rvr Bd
 - Conservation
 - Fish & Game # 5
 - Delta Protection Comm
 - Forestry & Fire Prot
 - Historic Preservation
 - Parks & Rec
 - Reclamation Board
 - Bay Cons & Dev Comm
 - DWR
 - OES (Emergency Svcs)
 - Bus Transp Hous
 - Aeronautics
 - CHP
 - Caltrans # 11
 - Trans Planning
 - Housing & Com Dev
 - Food & Agriculture
 - Health Services
 - State/Consumer Svcs
 - General Services
 - Cal EPA
 - ARB - Airport Projects
 - ARB - Transportation Projects
 - ARB - Major Industrial Projects
 - Integrated Waste Mgmt Bd
 - SWRCB: Clean Wtr Prog
 - SWRCB: Wtr Quality
 - SWRCB: Wtr Rights
 - Reg. WQCB # 2
 - Toxin Sub Ctrl-CTC
 - Yth/Adlt Corrections
 - Corrections
 - Independent Comm
 - Energy Commission
 - NAHC
 - Public Utilities Comm
 - State Lands Comm
 - Tahoe Rgl Plan Agency
 - Conservancy



Arnold
Schwarzenegger
Governor

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



Sean Walsh
Director

September 13, 2005

Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

Subject: San Diego Downtown Community Plan, Centre City Planned District Ordinance and
Redevelopment Plan for the Centre City Project Area
SCH#: 2003041001

Dear Alexandra Elias:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 12, 2005, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 16 2005

Orig. To: _____
Copy To: _____

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 923-3018 www.epr.ca.gov

2.1

2.1 No response is required.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003041001
Project Title San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area
Lead Agency San Diego, City of

Type EIR Draft EIR
Description The project consists of a series of revisions to the planning documents which govern downtown San Diego. The following documents would be amended: San Diego Downtown Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Project Area.

Lead Agency Contact
Name Alexandra Elias
Agency City of San Diego
Phone (619) 235-2200 **Fax**
email
Address 225 Broadway, Suite 1100
City San Diego **State** CA **Zip** 92101

Project Location
County San Diego
City
Region
Cross Streets I-5 and Hwy. 163
Parcel No.
Township **Range** **Section** **Base**

Proximity to:
Highways 163
Airports San Diego International
Railways BNSF, NCTD, MTS
Waterways San Diego Bay
Schools San Diego HS
Land Use The Centre City Plan area is planned for a variety of urban uses including offices, residential, retail, hotel, industrial and civic.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Health Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Caltrans, Division of Aeronautics

Date Received 07/28/2005 **Start of Review** 07/28/2005 **End of Review** 09/12/2005

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



Arnold Schwarzenegger
Governor

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



Sean Walsh
Director

Memorandum

Date: September 14, 2005
To: Lead Agency
From: Scott Morgan, Senior Planner
Re: SCH # 2003041001
San Diego Downtown Community Plan, Centre City Planned District
Ordinance and Redevelopment Plan for the Centre City Project Area

3.1

The State Clearinghouse sent out an end-of-review-period/closing letter for the above referenced project on September 13, 2005. We regret to inform you that we did not enclose a comment letter from Caltrans, District 11. This comment was received before the close of the review period. We apologize for this error and any inconvenience this may have caused.

Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 16 2005

Orig. To: _____

Copy To: _____

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 446-0613 FAX (916) 325-3013 www.opr.ca.gov

3.1 No response is required



Arnold Schwarzenegger
Governor

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



Sean Walth
Director

September 14, 2005

Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

Subject: San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area
SCH#: 2003041001

Dear Alexandra Elias:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 12, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,
Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 9044 SACRAMENTO, CALIFORNIA 95812-9044
TEL (916) 445-0613 FAX (916) 828-3018 www.opr.ca.gov

3.2

3.2 The letter from Caltrans was received independently and is addressed as letter #5.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003041001
Project Title San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area
Lead Agency San Diego, City of

Type EIR Draft EIR
Description The project consists of a series of revisions to the planning documents which govern downtown San Diego. The following documents would be amended: San Diego Downtown Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Project Area.

Lead Agency Contact

Name Alexandra Elias
Agency City of San Diego
Phone (819) 235-2200 **Fax**
Address 225 Broadway, Suite 1100
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City
Region
Cross Streets I-5 and Hwy. 163
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways 163
Airports San Diego International
Railways BNSF, NCTD, MTS
Waterways San Diego Bay
Schools San Diego HS
Land Use The Centre City Plan area is planned for a variety of urban uses including offices, residential, retail, hotel, industrial and civic.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Health Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Caltrans, Division of Aeronautics

Date Received 07/28/2005 **Start of Review** 07/28/2005 **End of Review** 09/12/2005

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

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 100
SAN DIEGO, CA 92108-4421
(619) 767-2370



September 12, 2005

Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Re: DEIR for the Centre City Planned District Ordinance

Dear Ms. Elias:

Thank you for the opportunity to review the above-referenced Draft EIR. The proposed project consists of replacing the existing Centre City Community Plan and the Centre City Planned District Ordinance in their entirety, and would require a Local Coastal Program land use plan and implementation plan amendment from the Coastal Commission. Staff have the following comments on the DEIR.

4.1

The DEIR breaks down the existing vs. proposed land uses by district. However, for purposes of assessing the plan's consistency with the Coastal Act, it would be helpful if the document included at least a rough breakdown of these existing and proposed land uses for the area within the Coastal Zone. In particular, Commission staff is interested in determining the proposed changes in land use designations for hotel and other visitor-serving uses, waterfront/marine uses, and public and open space uses.

4.2

On page 4-6, the DEIR references the Coastal Commission's jurisdiction within the Coastal Zone and states that coastal development permits issued by CCDC for "new development within this area are appealable to the Commission." To clarify, only a small portion of land within the subject project area is designated appealable—the area bounded by Beardsley Street to the south, Harbor Drive to the east, and the MHTL/Downtown Community Plan Area boundaries to the north and west. Only coastal development permits issued for development within this area would be appealable to the Coastal Commission.

4.3

Sections 5.1.1.4 and 5.1.3 describe a variety of plans, ordinances, and policies relevant to the proposed project area, including the San Diego Unified Port District's Port Master Plan. Staff notes that a substantial portion of the development proposed and approved in the Port's South Embarcadero Redevelopment Program I, including the Seaport Village Expansion and the Park Expansion Site, has been replaced with a revised project currently in the final stages of planning approval at the Port District. CCDC may wish to update this section of the DEIR to evaluate any potential conflicts with this new foreseeable redevelopment project.

DEVELOPMENT
CORPORATION

SEP 13 2005

Orig. To: _____

Copy To: _____

- 4.1 The requested information will be provided to the CCC as part of the Local Coastal Program amendment that will be submitted following approval of the Proposed Community Plan and Proposed Centre City Planned District Ordinance (PDO) by the City Council. The more detail on the area of CCC jurisdiction does not affect the conclusions of the EIR.
- 4.2 Comment noted, and language will be corrected. However, the more detail on the area of CCC jurisdiction does not affect the conclusions of the EIR.
- 4.3 While plans for Seaport Village have evolved since the Draft EIR was prepared, the currently planned uses would continue to be a mixed use development which would not pose any additional inconsistencies with the Proposed Community Plan. In addition, the San Diego Port's Master Plan has land use jurisdiction in the Seaport Village area. Thus, the conformance of the Proposed Community Plan is not as relevant as it is to the remainder of the Community Plan area.

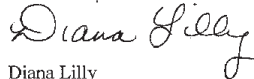
September 12, 2005
Page 2

4.4 The proposed plan includes the addition of several new designated view corridors, as indicated on 5.6-2. However, most of the existing designated view corridors would be substantially decreased in length; that is, where the existing view corridors along major streets currently extend from and through the heart of the downtown area out to the piers, many of the proposed view corridors begin at Kettner Boulevard and end at Harbor Drive. Almost all of the north/south view corridors are proposed to be eliminated, and the Ivy Street view corridor has been deleted. The EIR should include an analysis of why the elimination or reduction of each specific view corridor has been proposed and what impacts would be associated with the proposed revisions. Similar to the view corridor analysis, the proposed changes to the View Corridor Stepbacks should be specifically described and analyzed.

4.5 The proposed revisions to the Community Plan and PDO would implement a substantially different approach to the provision of parking in the downtown area than the existing plan by applying minimum off-street parking requirements for all new development. The EIR should provide some background as to why this change has been proposed. For example, did CCDC determine that the existing approach of not applying parking requirements for non-residential development has resulted in parking deficits? How was it determined that the proposed parking ratios would improve access and circulation compared to the current system? Do the proposed parking requirements represent a move away from the provision of centralized parking structures, or the development of high-density transit-friendly corridors? These potential impacts on public access should be analyzed in the EIR.

Commission staff is continuing to review the proposed changes to the revised PDO and Community Plan and may have additional comments in the future. Other information that may be received during the public comment period will be reviewed by staff during the LCP Amendment process. A final determination as to the amendment's consistency with the Coastal Act will be made by the Coastal Commission itself. Thank you again for the opportunity to comment. If you have any questions, please feel free to call me.

Sincerely,



Diana Lilly
Coastal Planner

cc: Sherilyn Sarb

(G:\San Diego\DIANA\Centre City misc\CC PDO DEIR comments.doc)

4.4 The map showing Existing Designated View Corridors is incorrect. The correct map has been included in the FEIR. As indicated by the corrected map. No designated view corridors are proposed to be deleted from existing under the Proposed Community Plan.

4.5 The proposed minimum parking requirements are based on input received from the community concerning a perceived growing need for parking and the traffic study completed for the Draft EIR. In the traffic study, completed by Wilson & Co, the parking section notes a current (albeit small) parking shortage, and an increased shortage of parking at plan buildout. In order to be conservative in the analysis, the EIR assumes that only the minimum amount of parking is provided and that no public parking structures are built. The proposed parking requirements, as outlined in the Proposed Centre City PDO and evaluated in the Draft EIR represent a balance between creating a high-density, transit friendly environment where multiple modes of travel are available and encouraged, and the need to provide a minimum amount of parking based on the demand of proposed new development.

DEPARTMENT OF TRANSPORTATION

District 11 · 2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110-2799
PHONE (619) 688-6954
FAX (619) 688-4299



*Flex your power!
Be energy efficient!*

September 12, 2005

11-SD-005
PM -16

Ms. Alexandra Elias
City of San Diego Redevelopment Agency
225 Broadway, Suite 1100
San Diego, CA 92101-5074

RE: San Diego Downtown Community Plan Update – Draft EIR (SCH 2003041001)

To Ms. Elias:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the proposed Downtown San Diego Community Plan Update. Given our mission of improving mobility and our direct responsibility as the owner / operator of the State Highway System, Caltrans considers itself a key stakeholder in downtown redevelopment efforts. The State highways serving downtown (Interstate 5 and State Routes 94, 163 and 75) should be regarded as both local and regional assets that facilitate access and mobility needs for the entire San Diego region.

Growth Impacts Must Be Mitigated

Caltrans recognizes that Downtown is the predominant activity center for the entire San Diego region and will likely continue to be so into the foreseeable future. As such, Caltrans encourages local governments towards redevelopment activities which can serve to target growth into existing areas more readily served by infrastructure improvements. However, there are impacts associated with growth which must be mitigated.

- 5.1
- 5.2
- 5.3

The Draft EIR document does not provide for adequate mitigation to the State highway facilities serving downtown. Specifically in the Executive Summary Table 1.3.1, the Draft EIR states: "Additional traffic on freeway ramps serving downtown associated with future downtown development would result in unacceptable delays" (Impact TRF-A.2.1). Note there is no mention of impacts to the main lanes of the highway system. But in the chapter for Cumulative Impacts, Chapter 6, under 6.2.6.1 the document states "Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps." There is also no proposed mitigation whatsoever as stated on Executive Summary Table 1.3.1: "As CCDC and future developers do not have

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CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 15 2005

Orig. To: _____
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- 5.1 The EIR notes that the proposed Downtown Community Plan will result in both direct and cumulatively significant traffic impacts to study area freeway segments and ramps. Mitigation of these impacts will require development and regional acceptance of a feasible program to improve freeway segments and ramps in the downtown area. Previous studies have identified a number of alternatives which require further analysis and refinement to ensure appropriateness, feasibility of implementation and local, as well as regional level support. To mitigate identified impacts, CCDC, along with Caltrans, SANDAG, and the City of San Diego will need to continue to pursue and promote improvement of the I-5 freeway facilities through the downtown area.
- 5.2 The potential for impact to freeway segments has been added to the Executive Summary.
- 5.3 See response to comment 5.1.

Ms. Alexandra Elias
 September 12, 2005
 Page 2

- 5.3 Cont. direct control over implementing freeway improvements, no mitigation measures can be implemented by CCDC or future developers." This non-mitigation of significant potential direct and cumulative impacts is unacceptable.
- 5.4 The California Environmental Quality Act (CEQA) requires that both the direct and cumulative impacts of a project be considered. Caltrans endeavors that any direct impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA standards. Mitigation measures must be included in the traffic impact analysis and environmental studies for a project.
- 5.5 Cumulative impacts of a project, together with other related projects, must be considered when determining a project's impacts. A cumulative impact is the sum of the impacts of existing conditions, other projects, and the project itself – no matter how small the contribution is from the project itself. There is no minimum size limitation on projects that may be required to mitigate for cumulative impacts if the project contributes to the problem in any amount. Caltrans supports the concept of "fair share" contributions on the part of the developer for future interchange improvement projects and/or other mitigation measures, such as freeway mainline improvements.
- 5.6
- 5.7 Caltrans asserts that some actions in the Community Plan update will generate cumulative impacts to several segments of the freeways considered in the traffic analysis which must be mitigated. Part of the proposed mitigation measures for cumulative impacts for the freeways (State Highway System) include, but are not limited to, working with SANDAG to attempt to obtain funding sources, the development of a Transportation Development Impact Fee (TDIF) that would include the State Highway System, similar to the newly adopted Transportation Impact Fee program from the County of San Diego. The recent voter-approved TransNet sales tax extension (Proposition A) has a requirement of a \$2,000 fee for each new single-family dwelling unit for regional transportation facilities. Caltrans encourages the continual development and enforcement of TDIF programs or other similar alternative funding programs for future infrastructure needs that could include operational improvements to the state highways as part of the regional transportation facilities, thereby satisfying the requirements of the TransNet extension and mitigating part of the cumulative impacts generated by development.
- 5.8 Generally, a local public agency (e.g., the City of San Diego Redevelopment Agency) approves a proposed project or plan which includes mitigation measures recommended by Caltrans; and the local agency then collects the Fair Share funds from the project proponent and administers them until such time as mitigation improvements are implemented on the State highway system, whereupon Caltrans will enter into a Cooperative Agreement with that "Lead Agency." However, in some cases, Caltrans will enter into an agreement for mitigation directly with a project proponent when the local public agency does not wish to

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- 5.4 See response to comment 5.1.
- 5.5 Cumulative impacts have been considered and identified in Section 6.2.6. Impacts to freeway segments and ramps have been identified as significant.
- 5.6 The concept of promoting/requiring "fair-share" contributions on the part of developers for improvements to the freeway system will need to be addressed as part of the implementation of an acceptable program to improve freeway segments and ramps. As such, the specification of such requirements cannot be determined at this time.
- 5.7 As indicated in response to comment 5.5, significant cumulative impacts on freeways are identified in the EIR. CCDC and the City of San Diego continue to work with SANDAG on an on-going basis to identify sources and obtain funding for a variety of transportation system improvements. Two recent examples of this in the downtown area were for the Park to Bay Link and, more recently, the Harbor Drive Pedestrian Bridge at Eighth Avenue and Harbor Drive.

Also, future residential growth in the downtown will be subject to the Regional Transportation Congestion Improvement Program, as stipulated by the Transnet legislation and will provide additional funds for improvement of the regional arterial system. A separate Transportation Development Impact Fee (TDIF) program has not been proposed and is not anticipated at this time

- 5.8 See response to comments 5.6 and 7.

Ms. Alexandra Elias
 September 12, 2005
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5.8 Cont. collect and administer funds for State highway system mitigation. In that situation, subject to local agency approval, the local public agency will condition project approval upon the project proponent entering into a "Traffic Mitigation Agreement" with Caltrans for the mitigation.

5.9 Caltrans encourages the lead agency and the responsible agency (San Diego's Redevelopment Agency directly or via CCDC and the City of San Diego) together with other regional and local agencies, to take an active participation in the funding, development, and implementation of a joint vision for the State Highway System serving this area, similar to the action taken on mitigation measure TRF A.2.1, thereby addressing the direct and/or cumulative impacts generated by development and preserving the needed Right of Way (R/W) for the implementation of such improvements to the State Highway System.

Increase Coordination Between Transportation And Land-Use

5.10 Caltrans is supportive of land use planning which considers its effect on the regional transportation system; therefore based on CEQA guidelines we invite the San Diego Redevelopment Agency / CCDC to submit new proposed developments to the Intergovernmental/ Development Review (IGR) branch at Caltrans and/or via the State Clearinghouse for enhanced interagency coordination as well as review of possible effects and potential mitigation to the State highways.

5.11 For the Downtown area, Caltrans encourages the project proponents (e.g., San Diego Redevelopment Agency, Centre City Development Corporation [CCDC]) to adhere to the City of San Diego's "City of Villages" vision and incorporate mixed use and residential densities that will continue to support transit and other modes. As envisioned in the "City of Villages" plan, the Downtown area should act as a Regional Center area providing convenient access to jobs, housing, and services for residents and visitors. Downtown should also be linked to other Village Centers and destinations by convenient transit service, enabling people to achieve a high degree of mobility without over-reliance on a particular mode of travel.

5.12 An interconnected grid street system offers the traveler multiple paths to reach any destination thereby alleviating potential congestion by providing alternative routes. These concepts lend support to a proposal for Collector-Distributor [C-D] road(s) to and through the downtown area.

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5.9 As indicated in response to comment 5.1, CCDC will continue to participate in Caltrans and SANDAG's efforts to plan for the future transportation needs of the I-5 Corridor and other roadways affecting access to, from and within downtown.

5.10 The Proposed Community Plan and Draft EIR have been submitted to Caltrans as well as the State Clearinghouse. Development in the future is anticipated to be consistent with the development strategy envisioned in the Proposed Community Plan. Agendas for meetings where proposed projects are considered by the Centre City Advisory Committee (CCAC), which is our Project Area Committee and Community Planning Group, and the CCDC Board of Directors are available electronically via email or by U.S. Postal Service. CCDC would be pleased to include Caltrans staff on this distribution list to keep abreast of recent developments.

5.11 The Strategic Framework Element of the City of San Diego's General Plan describes downtown generally, and then states on p. 50, "The City of Villages Strategy encourages the further intensification of Downtown to increase its role as a regional hub by maintaining and enhancing its role as the pre-eminent business center in this region and developing as a major urban residential center with the largest concentration of high density multifamily housing in the region." The Proposed Community Plan is fully consistent with the City of Villages concept as embodied in the Strategic Framework Element of the General Plan.

5.12 As CCDC has indicated in the past, it has concerns regarding the appropriateness and impact of the Collector-Distributor (C-D) system. Implementation of this system could potentially have major impacts on existing development along the contemplated route. The impact of the proposed C-D system on downtown intersections and road segments needs to be further evaluated before CCDC can support a C-D system.

Ms. Alexandra Elias
September 12, 2005
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Downtown San Diego Should Include Provision of Transportation Choices

As Center City is the region's primary "activity" center, Caltrans envisions a Downtown Plan that integrates recent transportation studies and plans that have been developed in the region.

5.13

Given the importance of mobility options, the Community Plan should provide an assessment of how various transportation options will be incorporated into the project. Specifically, pedestrian and bicycle access to and through Downtown should be provided and Transportation Demand Management (TDM) strategies such as carpool and vanpool formation and parking addressed as well.

5.14

Caltrans acknowledges and supports the participation of transit agencies (SANDAG / Metropolitan Transit Development Board [MTDB]) in the Downtown Community Plan Update. As a transportation partner in the San Diego region, Caltrans expects that MTDB's Centre City Transit First Study concepts will not only be integrated into the Downtown Plan Update, but the plan should also consider, integrate, and analyze previous plan concepts developed in MTDB's TransitWorks and Transit First endeavors, SANDAG's adopted Regional Transit Vision, High-Occupancy Vehicle (HOV) / Managed Lane Study, and recently adopted 2030 Regional Transportation Plan (MOBILITY 2030), as well as the City of San Diego's "City of Villages" Plan.

SANDAG's latest Regional Transportation Plan (RTP) calls for the development of a regional system of HOV / Managed Lanes as well as a robust "Bus Rapid Transit" (BRT) system to accompany the existing light rail transit and commuter rail systems. Caltrans supports SANDAG's regional vision of freeway BRT operating on HOV / Managed lanes as a flexible, effective transit mode. In the Centre City area, State Route 94 is planned as a major freeway BRT corridor in addition to regional transit service provided from Escondido and Chula Vista.

5.15

Caltrans recommends that the Lead Agency and Responsible Agency via CCDC and MTDB (SANDAG) develop ambitious, yet technically sound plan concepts for regional BRT services from future HOV / Managed lanes on State Route 94. It is also recommended that the Downtown Plan Update integrate any regional BRT services from State Route 94 into the local circulation, street design and zoning plans, especially on the freeway couplets serving SR-94 ('F' and 'G' Streets), SR-163 (10th and 11th Avenues), and I-5 (4th and 5th Avenues).

5.16

Furthermore, should the Downtown Plan develop viable plan concepts for additional HOV lanes on Interstate 5 (assuming major freeway operational needs also met via some major

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5.13 The Proposed Community Plan recognizes and promotes the diversity of transportation options in the downtown. Chapter 7 of the Proposed Community Plan contains a comprehensive view of transportation downtown, beginning with detailed descriptions of street types proposed for downtown. Bicycle facilities are shown on Figure 7-1, along with these different types of streets intended to provide a variety of mobility options. Additionally, pedestrian movement is a critical component of the urban fabric, and thus, Pedestrian Priority Zones are shown on Figure 7-2. These would be areas where an enhanced pedestrian environment is a goal of the Plan. Chapter 7, developed in collaboration with staff from the San Diego Association of Governments (SANDAG), also describes the transit network and potential future improvements, including Bus Rapid Transit (BRT). The proposed plan includes a discussion of parking, along with goals and policies, as well as a Transportation Demand Management (TDM) section. TDM measures are also included in the Proposed Centre City Planned District Ordinance.

5.14 CCDC acknowledges and supports the participation of SANDAG (formerly MTDB) staff in the development of the components of the Transportation Chapter of the Proposed Community Plan (Chapter 7). The Proposed Community Plan is consistent with the list of plans/studies and plan concepts put forth in the 2003 RTP and other related plans, but it is not required, nor would it be practical or appropriate to reproduce policies or explain in detail the reasons for consistency in the Proposed Community Plan document or in this EIR.

COMMENTS

RESPONSES

- 5.15 The Proposed Community Plan is consistent with planned transit services providing access to/from downtown. While exact routings downtown are still under evaluation, the EIR does contemplate removal of parking lanes along B Street for potential BRT during the peak hours. Furthermore, similar accommodations for BRT on Highway 94 can be made once SANDAG and Caltrans plans are more defined.
- 5.16 The Proposed Community Plan assumed improvements consistent with the SANDAG RTP which includes HOV lanes on I-5. The inclusion of direct access ramps would need to be considered as part of the development of an acceptable program to improve the freeway system serving the downtown area.

Ms. Alexandra Elias
September 12, 2005
Page 5

5.16
Cont.

operational improvement like a Collector-Distributor [C-D] road), Caltrans recommends that CCDC work with regional transportation partners to also include plan concepts for direct access connections from I-5 HOV lanes onto Centre City streets. Direct Access Ramps (DARs) would provide a more balanced HOV system in the Centre City and also improve and maintain freeway operations.

Improve Freeway Operation through Downtown (e.g., I-5)

5.17

While an emphasis on walking and transit can help address local and internal transportation issues, vehicular traffic (particularly to and from freeways) will continue to be the dominant mode into, out of, and within Downtown. A recent Caltrans / City of San Diego / SANDAG study shows that by 2020, traffic on the Interstate 5 corridor will increase by over thirty percent (30%). Growth projections for the Centre City between 2000 and 2020 forecast a 52% increase in office square footage, almost 7% in retail square footage, and a 333% increase in housing units. The proposed plan update assumes growth rates that exceed this study.

5.18

Of concern to Caltrans is how this Plan Update will affect the freeway system in its operation and R/W preservation. Interstate 5 (I-5) and State Routes 94 and 163 (SR-94, SR-163) currently suffer from congestion during the morning and evening commute periods. Furthermore, only a small percentage of I-5 freeway traffic is projected to “pass through” the Centre City area. In other words, most regional freeway traffic within the Centre City requires access into or out of Centre City or a surrounding activity center (e.g., airport, seaport, Balboa Park). Changes to land use in the Downtown area may contribute to demand beyond that planned for these facilities. Therefore, Caltrans suggests that “planning principles” developed to guide the Downtown Community Plan Update reflect a multi-modal transportation system including freeways, where both “mobility” and “access” are well balanced.

5.19

The Regional Transportation Plan (RTP) and the Regional Transportation Improvement Program (RTIP) document how transportation facilities in the San Diego region are planned to be implemented. The Downtown Community Plan should document clearly a nexus between the phased implementation of the RTP and RTIP with implementation of the Community Plan. In order to assure sound coordination between transportation and land-use, additional land use intensification affecting the local and regional circulation system should only be implemented subject to the development of accompanying transportation projects. Concurrently staged development of transportation and land use is necessary to assure continued high mobility for San Diegans. That is why a joint planning and funding vision for

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5.17 The Proposed Community Plan densities and intensities were not known at the time I-5 study was completed. However, the analysis contained in the EIR is based on the increased buildout potential consistent with the City of San Diego General Plan, and is provided in the EIR to analyze the effect of the increased traffic on the freeway system to provide this information to Caltrans and did not assume a specific time frame or rate of growth.

5.18 As indicated in response to comment 5.1, I-5 is a regional facility and will be impacted directly and cumulatively by the growth in the downtown study area. However, as a regional facility, the I-5 freeway also serves a high proportion of trips which are passing through the downtown area, without a downtown origin or destination. CCDC is in agreement that both mobility and access to, from and within downtown are important objectives. Planning principles related to transportation and reflecting a multi-modal environment are contained in Chapter 7 of the Proposed Community Plan.

5.19 Due to the dynamics of the land economy and the real estate market, the exact timing, location, and sequence of downtown development can not be determined with any certainty. The monitoring of downtown traffic as stipulated by Mitigation Measures TRF – A.1.1 and TRF – D.1 will assist in establishing the need and timing for transportation improvements serving the downtown area.

In addition, CCDC will support Caltrans, SANDAG, and the City of San Diego in the development of an acceptable program for improving the freeway segments and ramps serving the downtown area. The development of the program should include a phasing program coordinated with available downtown development plans at that time.

Ms. Alexandra Elias
 September 12, 2005
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5.19
 Cont.

the State Highway System serving the Center City area is so important for the implementation of staged improvements and the preservation of needed R/W.

5.20

In November 2002, a 30-month, \$400,000 Central Interstate 5 Transportation Corridor Study was completed. This Corridor Study developed an effective program of transportation improvements to address overall freeway congestion as well as access issues between I-5 and major activity centers in and around the Centre City area. Unfortunately, due to a substantial intensification of proposed land use, the Draft EIR for the Downtown Community Plan update changes various assumptions from the Central I-5 Corridor Study. Nevertheless, Caltrans encourages the City Redevelopment Agency / CCDC to integrate plan concepts and transportation improvements from the I-5 Corridor Study into the Downtown Community Plan Update.

5.21

Because the land use intensity assumptions have changed from the Central I-5 Corridor Study to this Community Plan update, there may be additional mitigation requirements necessary in order to effectively deal with the increased impacts. Caltrans may suggest that the project proponents for specific developments within this area pursue Locally Funded Projects such as highway / interchange improvements based on the joint vision mentioned above. The locally funded improvement process includes a Project Study Report (PSR), Project Report and Environmental Document, final design, and construction of the improvements. Potential improvements may include – but not be limited to – widening I-5 through downtown, widening existing ramps, ramp metering, modification to ramp signals, and/or adding auxiliary lanes to I-5.

Many of the transportation plan concepts developed in the Central I-5 Corridor Study were not officially recommended for further consideration (nor included in MOBILITY 2030, SANDAG's Regional Transportation Plan). Caltrans recognizes that this Downtown Plan Update is an opportunity to continue discussion and analysis of these transportation plan concepts within a landuse planning process. Caltrans recommends that CCDC and its support staff further analyze the following outstanding issues from the Central I-5 Study in the Downtown Plan Update.

5.22

1) Major operational improvements to the Centre City I-5 corridor ("S-Curve")

Much of the recurrent congestion experienced on I-5 in the Centre City "S-Curve" is due to conflicting demand streams from local ramps and intersecting freeways. The proposed improvement to address these operational deficiencies was a "collector-distributor (C-D) road" on the outside of the existing I-5 alignment. The proposed C-D concept would separate freeway "access trips" (to and from local ramps and freeway connectors) from

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5.20 As indicated earlier, the Proposed Downtown Community Plan proposes a general intensification of development downtown which is consistent with the Strategic Framework Element of the General Plan. Further, CCDC agrees with the need to further study the impacts of Caltrans' proposed improvements within the I-5 corridor, and specifically within the "S-Curve" of downtown. CCDC does not propose, as part of the Proposed Community Plan, nor does it support the initiation of any improvements without a complete analysis and discussion of the impacts to the downtown environment of Caltrans' proposed ramp closures, institution of a Collector-Distributor facility, expansions and/or changes to existing freeway conditions downtown.

5.21 Comment noted.

5.22 See response to comment 5.12.

Ms. Alexandra Elias
September 12, 2005
Page 7

5.22
Cont.

"through trips" already in the general-purpose lanes, thereby improving freeway operations.

This proposed operational improvement might be facilitated via separate travelways and/or viaducts, with structures requiring additional Right of Way (R/W) encroaching into Centre City or surrounding neighborhoods. Caltrans recognizes the potential impacts of these proposed improvements and respects the region's need to further study these impacts.

2) Major capacity-enhancing improvements to the "S-Curve"

5.23

Notwithstanding its operational deficiencies, much of Interstate 5 in the vicinity of Centre City does not have the capacity for today's traffic demands, particularly in the morning and afternoon commute periods. In 2020, general traffic volumes will increase to a point that freeway segments within the Centre City area will also have insufficient capacity during the peak periods which will be of longer duration due to the proposed development.

The Central I-5 Study recommended that I-5 include an additional two (2) freeway lanes to accommodate High-Occupancy Vehicle (HOV) lanes through the Centre City area to increase capacity and promote ridesharing. SANDAG has shown its support of this plan concept by including this improvement in its "reasonably-expected" financial scenario of MOBILITY 2030. Given the physical constraints of the "S-Curve," Caltrans and the partnering agencies acknowledged that one feasible alternative for accommodating two additional lanes on I-5 without significant right of way acquisitions was to:

- Develop the aforementioned "collector-distributor road" outside of the existing I-5 alignment
- Convert one inside lane in each direction into an HOV lane
- Convert the remaining outside auxiliary lane (in each direction) into general purpose lanes (note: auxiliary lanes not needed if C-D road present)

5.24

3) Minor operational improvements to the "S-Curve"

As part of the analysis for the proposed C-D road, the Central I-5 Corridor Study recommended that access to and from Interstate 5 be reduced in order to improve freeway operations. To increase spacing between on/off-ramps, some low-volume ramps were recommended for closure. It is recommended that CCDC, regional agencies and Caltrans

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5.23 CCDC does not propose as part of the Proposed Community Plan, nor does it support the initiation of any improvements without a complete analysis and discussion of the impacts to the downtown environment of Caltrans' proposed ramp closures, institution of a Collector-Distributor facility, expansions and/or changes to existing freeway conditions downtown.

5.24 As indicated in response to comment 5.23, CCDC does not propose as part of the Proposed Community Plan, nor does it support, any freeway improvements without a complete analysis and discussion of the impacts to downtown.

Ms. Alexandra Elias
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5.24
 Cont.

work together to resolve issues with near-term ramp closures (e.g., 'C' Street on-ramp) as well as long-term closures needed to accommodate operational improvements such as a C-D road (e.g., 1st Avenue on-ramp).

Since the Central I-5 Corridor is at capacity during the peak A.M. and P.M. periods, ramp meters are in place or will soon be added to the on-ramps for various interchanges serving the Downtown area. In fact, as Caltrans general policy, we assume that all local ramp interchanges in the San Diego metropolitan area will have signalized ramp control by the year 2020. The circulation element of the Downtown Plan Update should reflect this policy. The additional traffic being generated by new development in the area may result in long queues of vehicles, which will exceed the storage available on the ramps. This will result in the storage of traffic on the local street system and serious congestion at the on-ramps and local street intersections.

5.25

4) *New freeway connection from I-5 to 10th Avenue Marine Terminal and East Village*

The Central I-5 Study recommended that a new freeway connection be established between Interstate 5 and the 10th Avenue Marine Terminal. SANDAG has shown its support of this plan concept by including this improvement in its "revenue-constrained" financial scenario of MOBILITY 2030. The proposed connector would not only remove heavy trucks from the local Barrio Logan community, but it would also provide additional freeway access to the Convention Center, Ballpark District, and East Village. Viable alignments of the proposed freeway connector may involve new roadway structures, which could create other impacts on Centre City as well as Barrio Logan. It is recommended that CCDC work with Caltrans, the Port of San Diego, and the local communities to develop viable plan concepts for the proposed and recommended freeway connector within the framework of the Downtown Community Plan Update process.

Improve other Major Arterials in and around Downtown (e.g., SR-163, Pacific Hwy.)

5.26

1. *Pacific Highway as a potential high-occupancy arterial roadway*

The Central I-5 Corridor Study recommended that improvements be made to facilitate general purpose and HOV connectivity between Interstate 5 and Pacific Highway north of Interstate 8. Should HOV lanes not be developed on Interstate 5 through the Centre City, Pacific Highway could serve as a viable alternative to access the downtown area. Improvements to Pacific Highway have been developed to facilitate HOV demand from I-5 to the Old Town Transit Center as well as Lindbergh Field. Caltrans recommends that

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5.25 As indicated in response to comment 5.23, CCDC does not propose as part of the Proposed Community Plan, nor does it support, any freeway improvements without a complete analysis and discussion of the impacts to downtown. As indicated in response to comments 5.1, 5.12 and 5.20, the location of any new freeway connection between I-5 and the Tenth Avenue Marine Terminal has not been determined. The I-5 Corridor Study recommended "further consideration and study within the broader context of the Central I-5 Corridor Study" of new freeway ramps to the Tenth Avenue Marine Terminal. The I-5 Corridor study concludes that "because of significant impacts of the viaduct to the local community, alternative alignments, including increased use of 32nd Street should be evaluated in detailed engineering and environmental studies. These are neither the responsibility of CCDC, nor a component of the Proposed Community Plan requiring review.

5.26 Pacific Highway south of Laurel Street is in the North Embarcadero Visionary Plan (NEVP) area. Any improvements to Pacific Highway proposed by Caltrans must be consistent with the NEVP, and approved by CCDC, the Redevelopment Agency and the Port of San Diego.

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5.26
 Cont.

improvements on Pacific Highway be considered and developed south of Laurel Street to Broadway to foster HOV demand further into the Centre City area.

5.27

2. Potential Improvements to State Route 163

State Route 163 (The Cabrillo Freeway) is a four-lane freeway from Interstate 8 to Centre City. Caltrans would like CCDC to include innovative strategies in the Downtown Plan Update that could look at ways to balance travel demand in the corridor with the environmental sensitivities inherent in the route. Examples could include value pricing (Fastrak), HOV / transit-only operation during peak commute hours, weekday HOV / transit operation, etc. However, due to considerable community and environmental concerns, this particular segment has no long-range capacity-enhancing improvements planned. Caltrans acknowledges local stakeholders' need to preserve the unique nature of State Route 163 and its surrounding environs within Balboa Park.

Central Interstate 5 Right of Way Issues

Caltrans acknowledges the disruptive nature of transportation facilities, particularly State highways, on surrounding communities in the Centre City area. Caltrans encourages the Redevelopment Agency / CCDC to develop a Downtown Plan that considers freeway facilities as assets and subsequently seeks mutually beneficial opportunities to reduce freeway nuisances and disruptions.

5.28

Caltrans acknowledges CCDC's planning goal to "reconnect" Centre City with its surrounding communities. Caltrans respects this goal and supports an open dialogue to create and develop opportunities to achieve such goals. These opportunities, however, should be developed in a manner that does not foreclose or inhibit the State's ability to develop long-range transportation improvements within its Right of Way (R/W) in the future. A critical aspect of any future development in the Center City area, especially property adjacent to I-5, would be consideration of its effects on preservation of R/W in the central I-5 corridor. Furthermore, any possible airspace lease in the Downtown area would need to include the State's indemnification against park replacement if/when the land is needed for future freeway widening.

To date, preliminary concepts to "reconnect" Centre City with its surrounding community have been introduced for public debate with minimal participation or input from Caltrans.

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5.27 CCDC does not propose, and would not endorse, improvements to SR 163 that have been eliminated in previous studies due to environmental and community concerns. If Caltrans proposes changes to SR 163, CCDC would be willing to review and provide input.

5.28 The concept of reconnecting downtown to Balboa Park was the subject of a feasibility study by Simon Wong Engineering, and completed in August 2003. While the study determined that the construction of such a facility is feasible, there are a number of urban design issues that must be resolved to ensure that it is successful. Pursuit of this improvement would be planned and coordinated with Caltrans.

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5.29

1. *Cortez Hill / Tweet Street Park*

The proposed development of linear parkland in the Cortez Hill / Tweet Street area would utilize a portion of the State R/W. This Tweet Street Park is shown as "existing" parkland, to which a freeway lid may be appended for linkage to Balboa Park and for development as a "mixed neighborhood center." It seems preliminary to classify the park as "existing" since no formal agreement has yet been reached with CCDC. Caltrans has been pursuing an Airspace lease in this area for several years, but the language is still being sorted out. As any proposed airspace lease must be submitted to the statewide Airspace Advisory Committee, it must be said that the park does not yet exist. The area shown as "Tweet Street Park" is thus still operating State right of way. Perhaps on the EIR mapping, the parcel should be shown as "proposed parkland." Caltrans has not declared the R/W needed for Cortez Hill Park to be "excess" and does not anticipate doing so in the future. Caltrans continues to work with CCDC toward the development of this parkland, with the understanding that this R/W may need to be reclaimed for future highway improvements.

5.29 Comment noted. The Proposed Community Plan will show Tweet Street as "proposed".

5.30

2. *"Lid" or "Cover" on Interstate 5*

Caltrans supports "context-sensitive solutions" to transportation improvements to minimize impacts on local communities. The Interstate 15 (I-15) park deck and enhanced bridges across I-15 at El Cajon Boulevard and University Avenue are examples of this kind of enhancement. However, development of an I-5 cover or the use of existing State R/W for non-freeway purposes should be considered in context with the results of the Central I-5 corridor study and other potential transportation project needs. There are many demands on limited R/W that should be carefully considered, taking into account both transportation and land use needs.

5.30 See response to comment 5.28.

Due to the extraordinary cost of context-sensitive measures such as covering I-5, Caltrans cannot alone advocate for such an infrastructure investment without the collective will of the region to support it. We therefore see the substantial investment in Centre City development as an opportunity to move towards consensus on the types of context-sensitive solutions desired as well as potential sources of funding for any significant proposed improvements. Also, airspace development and lease implications will be important issues to resolve for any "lid" application.

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Ms. Alexandra Elias
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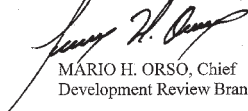
5.31

3. Other Right of Way and/or "Airspace" Issues

Caltrans notes that there is already some potential illegal new condominium development encroachment ("Mills") into State R/W which could complicate any widening project in the corridor. Also, as a general comment, Caltrans does maintain several existing airspace leases along the I-5 corridor through the downtown area, notably the Neal Goode homeless shelter at 17th Street, and some parking spaces at 1st and Cedar. In the same area of the "S curve" downtown, there are other R/W factors which might become important such as a developer at Ash Street who has plans to place underground structures within the State R/W. Obviously this proposal would require substantial intergovernmental review and coordination, if even feasible.

Caltrans recognizes the important link between transportation and land use, which is especially critical in the regional center that is Downtown San Diego. Thank you again for the opportunity to be involved in the Downtown Community Plan Update process. Caltrans looks forward to continuing cooperation with the San Diego Redevelopment Agency / CCDC in coordinating land use and transportation issues. Caltrans envisions a continuing level of participation in the Plan Update and subsequent activities, and we encourage a more committed partnership to reflect this vision. If you have any general questions on the Department's comments, please contact Brent McDonald at (619) 688-6819.

Sincerely,


MARIO H. ORSO, Chief
Development Review Branch

- cc: BMcDonald Dev. Rvw. MS-50
- PLandrum Planning MS-50
- EAllegre Planning MS-50
- EGojuangco Frwy. Ops. MS-55
- FBirchmore R/W MS-54
- JGrisafi R/W Engr. MS-52

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5.31 Comment noted.



401 B Street, Suite 800
 San Diego, CA 92101-4231
 (619) 699-1900
 Fax (619) 699-1905
 www.sandag.org

CENTRE CITY
 DEVELOPMENT
 CORPORATION

SEP 12 2005

Orig. To: _____

COPY TO: _____ File Number 5001700

September 12, 2005

Ms. Alexandra Elias
 Centre City Development Corporation
 225 Broadway, Suite 1100
 San Diego, CA 92101

Dear Alex:

We have reviewed the draft San Diego Downtown Community Plan Update, Planned Development Ordinance (PDO), and Environmental Impact Report, and offer the following comments:

Land Use and Urban Design

The community plan does an excellent job of encouraging intensification of both residential and employment uses. The urban design guidelines support building a pedestrian friendly environment, and are consistent with the goals of our Regional Comprehensive Plan.

Transit

The plan correctly identifies B and C Streets as potential Bus Rapid Transit (BRT)/shuttle corridors in Figure 7-3. Exclusive transit lanes along this couplet would be needed to provide fast and efficient operations. As noted in Figure 7-3, final design for any transit plans in these corridors would require additional study.

We will better be able to assess BRT and shuttle facility and service needs in the downtown area upon completion of two study efforts currently underway that will guide both short- and long-range improvements to the regional transit system. The Comprehensive Operational Analysis (COA) being undertaken by the Metropolitan Transit System (MTS) will evaluate and restructure existing services to improve its efficiency and effectiveness in meeting regional travel needs, while the Independent Transit Planning Review being managed by SANDAG will evaluate the longer-range transit plan contained in our Regional Transportation Plan in light of global "best practices." Both of these studies will be completed in mid-2006. The next step will be to develop a detailed mid- to long-range service and facility improvement plan for the downtown area based on the results of these two studies. This effort is set to begin in early 2006 and would be jointly managed by SANDAG and MTS, and coordinated with CCDC staff.

6.1

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North San Diego County Transit Development Board
- United States Department of Defense
- San Diego Unified Port District
- San Diego County Water Authority
- Mexico

6.1 As the comments in this letter refer to the Proposed Community Plan, and raise no issues related to the adequacy of the EIR, no specific responses are necessary.

Parking

We generally concur with the proposed parking policies in the draft community plan and acknowledge CCDC efforts to minimize parking impacts through increased usage of alternative modes. While we recognize the need to create sufficient parking to accommodate future growth, there are pricing strategies that can be implemented that would further strengthen the draft community plan Goal 7.3-G-2 of increasing transit usage and Policy 7.5-P-1 of providing transit reimbursement and other benefits to other users of non-motorized travel. A recent study (Transit Cooperative Research Program Report 95, *Parking Pricing and Fees*, Transportation Research Board, 2005) reports that most employees are provided with free or subsidized parking by their employers. The role of employer-provided parking as a contributor to high rates of single-occupant vehicle use has received considerable attention. Commuters on average avoid direct payment of the majority of the true costs of parking, which serves as a contributor to high rates of single-occupant vehicle use. Transportation demand management (TDM) strategies that eliminate this subsidy (for example, by requiring the employee to pay for parking or implementation of parking cash-out plans) have shown to have a positive effect on lowering vehicle trip generation rates and increasing the use of alternative modes.

We recognize that implementation of TDM programs with parking pricing strategies is an issue that needs to be addressed on regional scale. Our request, then, is for CCDC's support for evaluating such regional TDM strategies that could benefit downtown and to work with SANDAG on this effort.

Bicycle Facilities

Pacific Highway should be specified as having a Class 2 facility (bike lane). Additionally, we recommend that wheeled traffic be separated from pedestrian traffic along Harbor Drive.

One-way streets complicate bicycle circulation, especially on the north end of downtown where grades are significant. They also encourage higher motor vehicle speeds. Please consider converting some streets back to two-way. Where one-way streets are to remain, bikeways should be provided in couplets to provide for travel in both directions (for example Third and Fourth Avenues should have bikeways).

The plan should reference the City of San Diego Bicycle Master Plan. See especially page 97 for recommendations on how to reconfigure roadway striping to accommodate a bike lane.

Bicycle parking is seriously undersupplied downtown. The plan should specify the need for sidewalk bike racks, which should be of the inverted U design, and the need for bicycle lockers in private parking garages.

Thank you for the opportunity to comment on these downtown documents. We look forward to working with you to implement the community plan, and we congratulate you on a successful completion to what has been a complex community plan update process.

Sincerely,



BOB LETTER
Director of Land Use and Transportation Planning

CITY OF SAN DIEGO
MEMORANDUM

DATE: September 12, 2005
TO: Alexandra Elias, Senior Planner
Centre City Development Corporation
FROM: Deborah Sharpe, Project Officer II, Park Planning and Development Division
Park and Recreation Department
SUBJECT: Draft EIR for San Diego Downtown Community Plan, Sch. No. 2003041001

Thank you for the opportunity to review the Draft Environmental Impact Report (EIR) and offer information to make the public disclosure regarding parks and open space more concise. This Draft EIR was reviewed by the Park and Recreation Department for consistency with the City Progress Guide and General Plan recommendations relative to population-based parks and open space, as well as the City's park land inventory and needs statistics.

General comments:

The Recreation Element of the City's Progress Guide and General Plan recommends 2.8 acres of park land for every 1,000 residents, consisting of neighborhood and community parks. For every 3,500-5,000 residents a minimum 10.0 acre neighborhood park is required to be located within ½ mile service radius. For every 18,000 to 25,000 residents a minimum 20.0 acre community park and a recreation center is required to be located within 1 ½ mile service radius. For every 50,000 residents a community swimming pool is required within 1 ½ - 2 miles service radius.

The total population of the Downtown Community at full development in 2030 would warrant approximately 249.5 acres of population-based parks (89,100 x 2.8 ÷ 1,000 = 249.48) by these standards. According to the Park and Recreation Department's inventory of population-based park land, the existing and future parks as identified in the Downtown Community Plan will total approximately 76.88 acres at full community development. This represents .87 acres per 1,000 residents, well below the recommended standard.

The Recreation Element recognizes that these park land acreage recommendations must be applied with flexibility in the urbanized areas of the city where land resources are limited in order to capture and optimize park and recreation facilities opportunities as they present themselves, or are feasible to pursue. However, the Draft EIR should acknowledge the General Plan's population-based park land recommendations and discuss how the community plan update proposes to address the issue of not meeting those standards. The Draft EIR should discuss how impacts to surrounding communities will be mitigated due to the lack of land within the Downtown Community Planning Area large enough to provide for community park usage, such as organized sports, recreation center and swimming pool. There is no doubt that residents in the

7.1

7.1 The Recreation Element of the City's Progress Guide and General Plan (General Plan) sets forth a series of goals and guidelines to help guide the provision of recreation opportunities in both existing and new communities. On page 165, the General Plan identifies a range of acreages for various types of parks. The General Plan indicates that: "Population –based facilities *ideally* [emphasis added] constitute between 1.0 and 3.9 acres of land for each 1,000 residents. Open space lands, sports fields, plazas, landscaped areas should constitute approximately 1.1 to 2 acres/1000 residents". It is important to note that the General Plan goes on to indicate that "These figures are norms or abstract concepts, however, and should not be supplied rigidly."

As indicated on page 160 of the General Plan: “There is considerable variation among the various communities and areas of the City with respect to the actual facilities provided, total acreage and acres/1000 population.” On this same page, the General Plan acknowledges that “...the type of facilities and services and the space arrangements should relate to the population and use characteristics of the area served. The space and equipment indicated as desirable for them should be considered guidelines and not fixed needs.” The General Plan also recognizes that “In older, already developed parts fo the City, where recreation is difficult to acquire, efforts should be directed toward providing staff and facilities which compensate for deficiencies in acreage. Land, equipment, and supervision in varying proportions can still add up to recreation opportunity and service to the residents.”

The downtown area is treated differently than other areas within the City. This fact is further recognized by City of San Diego Strategic Framework Element which establishes an approach to, “Develop alternative methods of providing parks and recreational areas to meet the needs of urban and built-out communities, recognizing available land constraints and seizing opportunities for the creation of more accessible parks and integration of public space and recreation. Some examples include additional or enhanced structures within park and recreational areas, public plazas, pocket parks, urban trails, linear parks, and joint use facilities.”

The Proposed Downtown Community Plan embraces the City’s goals for new park development concurrent to meet the needs of the growing population. The Community Plan represents major advances in achieving new park space for downtown residents. In East Village, which will experience a substantial amount of the new population growth, the proposed Community Plan designates three new parks. The Proposed Community Plan and Centre City PDO also establish a Transfer of Development Rights (TDR) program for achieving the new park land. The Proposed PDO requires developments to integrate open space and recreational facilities. Lastly, the development impact fees for parks that are collected downtown will reinforce the implementation strategy.

In light of the unique circumstances associated with downtown and the flexibility included in the park goals, the proposed Community Plan would not be substantially inconsistent with the Recreation Element of the General Plan. As noted on page 5.1-22, the per capita park ratio would be 1.47 acres per 1000 residents. It should also be noted that this ratio is conservative because

COMMENTS

RESPONSES

it does not include Balboa Park. As noted on page 161 of the Recreation Element, parts of resource-based parks including Balboa Park "...can and do function to fulfill local neighborhood and community park needs of surrounding residents." If only 10% of the 1,200 acres of Balboa Park were counted toward downtown's needs, the overall ratio would equal the 2.8 acre/1000 ratio identified in the comment.

COMMENTS

RESPONSES

Downtown Community will want to participate in organized team sports and programmed recreation activities for themselves or their children which typically occur in community parks. Currently, large park acreage deficiencies exist in the surrounding communities which would be exacerbated by Downtown Community residents utilizing those limited resources.

7.2 Attached for your use is the Park and Recreation Department’s population-based park inventory which has been updated to include some of the park facilities identified as existing or proposed in the Draft EIR.

Specific comments:

7.3 Page 4-19, Park/Open Space
Typically, “small cafes” in and of themselves are not considered appropriate facilities for population-based parks (e.g., neighborhood, community and mini parks which serve a neighborhood recreation need.)

7.4 Page 4-27, 4.5.2.2 Parks, Open Space, and Recreation (Chapter 4)
Although streetscapes and plazas with pedestrian orientation are desirable elements of community, they should not be counted towards meeting park standards unless they incorporate some form of passive recreational amenities, such as fitness stations, benches tables, walking or running tracks, outdoor stage area, children’s play equipment, etc.

Page 5.1-22, 5.1.3.4 Substantially increase the physical deterioration of existing neighborhood, community or regional parks through excessive use (LU-D)

7.5 First Paragraph - The City of San Diego has a Joint Use Agreement with the San Diego Unified School District for Washington Elementary School which allows the community to access the school playground before and after school hours and on weekends and holidays. The City does not have such an agreement with for San Diego High School because of the intensive intramural sports team use by the school which does not allow time for community use. Additionally, the City has no formal agreement to utilize landscaped areas owned by the Community College District for park purposes and should not be regarded as such.

7.6 Second Paragraph - The mathematical calculations in this paragraph are misleading. The calculation used both existing and approved park acreage, but used only existing population. The calculation should include both existing and approved park acreage, and population, but not include the acreage and population proposed by the community plan update. Assuming, for discussion purposes, that the existing and “pipeline” park acreage is 104 acres, this represents 2.5 acres per 1,000 residents using the current and “pipeline” population (104 ÷ 41,400 x 1,000 = 2.5 acres/1,000) not 4.0 acres per 1,000 as stated. The reduced 55.6 acres represents 1.34 acres/1,000 residents, not 2.0 acres per 1,000 as stated.

7.2 Comment noted.

7.3 Downtown is a unique, urban environment, and small cafes are a common feature in parks and open spaces in the downtowns of major cities. Such uses are a common feature of successful urban parks because they activate and populate recreation areas. Page 159 of the Recreation Element indicates that other recreational opportunities “...include sports fields, open space parks, plazas, large and small landscape areas and mini-parks.”

7.4 See response to comment 7.3.

7.5 Although no formal agreement may exist with San Diego High School, its sports fields are available when not in use for school activities. Similarly, although no formal agreement may exist with the San Diego Community College, the lawn areas are open to the public and are commonly utilized. Thus, inclusion of these areas is considered appropriate.

7.6 As discussed in response to comment 7.1, the Recreation Element does not establish a hard and fast rule for providing parkland to the various communities within the City of San Diego. As further indicated in response to comment 7.1, the per capita ratio of parkland would be consistent with the inclusion of a small portion of Balboa Park.

7.6
Cont.

The existing and proposed park acreage identified in the proposed Downtown Community Plan (104 and 130.8, respectively) should only include the land owned by a government agency or where the City has received authorized usage via an executed agreement.

represents .86 acres per 1,000 residents

Page 5.1-25, Table 5.1-1 Existing Downtown Parks and Open Space

7.7

Attached is the Park and Recreation Department's Inventory and Needs statistics for Center City which has been revised to show the existing population-based park acreage and the additional acreage proposed in the Downtown Community Plan. This Table should be revised to jibe with the inventory of record which is based on City property records.

The locations and sizes of the "Other approved and under-development parks" should be identified so the acreage can be verified.

Also attached is a GIS aerial photo showing the acreage and park names of record for the area noted as Martin Luther King, Jr. Promenade in the Draft EIR for your use.

Page 5.1-26, Improved Accessibility

7.8

Although the Park and Recreation Department supports the Community Plan's proposals to "...increase the number, variety, quality, and accessibility of park space...", it does not agree that "...there would be no significant impact to parks and recreations." The existing and proposed park acreage of 130.8 represents 1.47 acres per 1,000 residents at full community development ($130.8 \div 89,100 \text{ population} \times 1,000 = 1.47 \text{ acres}/1,000$). If the non-governmental land is removed from the calculation as done on Page 5.1-22, the result is $82.40 \text{ acres} \div 89,100 \times 1,000 = .93 \text{ acres}/1,000$. These figures are well below the 249.48 population-based park acreage recommended by the General Plan for 89,100 residents and should be discussed in this EIR as an unmitigated impact. A large impact will be felt in adjacent communities, which are already deficient in population-based park acreage, where team sports and recreational activities are programmed at park and recreation facilities.

Deborah Sharpe, Project Officer II
Park Planning and Development

Attachments: Centre City Population-Based Park Acreage Needs Statistics
GIS Aerial Photo of parks along Harbor Drive

Cc: Ted Medina, Park and Recreation Director
April Penner, Deputy Director, Park Planning and Development Division
Park and Recreation Department

7.7 The information in this table was drawn from the Proposed Community Plan. If this Plan is modified to reflect any of the information contained in the table, it will be included in the FEIR.

7.8 As indicated in response to comment 7.1, the planned parkland in downtown is not considered inconsistent with the Recreation Element.

Centre City		9/19/2005		
Population-Based Park Needs		CDCD POPULATION		
DU X PPH	2004	2030	DU X PPH = POP	
Population	21,237	89,100	53,100	DU
Population-Based Park Acreage	59.46	249.48	1.68	PPH
2.8 acres/1,000 population = acres required			89,100	POP
(Source: Land Development Code)	PPH	1.41 PPH	1.62	
PARKS by CLASSIFICATION				
	Gross Acres	Developable Acres	Useable Acres	Future Acres
Community	0.00	0.00	0.00	0.00
SUBTOTAL	0.00	0.00	0.00	0.00
Neighborhood				
Amici Park	1.16	1.16	1.16	0.00
Children's Park	1.68	1.68	0.00	0.00
Civic Center Plaza	1.38	1.38	0.00	0.00
Civic Square (future)	0.00	1.40	0.00	1.40
College "Plaza"(future)	0.00	0.46	0.00	0.46
County Admin.	6.00	14.80	6.00	8.80
East Village(future)	0.00	4.10	0.00	4.10
Embarcadero North	9.90	9.90	9.90	0.00
Embarcadero South	10.60	10.60	10.60	0.00
Freeway lids (future)*	0.00	11.20	0.00	11.20
Heath Davis House	0.12	0.12	0.12	0.00
Horton Plaza	0.49	0.49	0.49	0.00
King Promenade	0.45	0.45	0.45	0.00
Marina Linear Park*	3.01	3.01	3.01	0.00
N. Embarcadero Prom.	11.80	11.80	11.80	0.00
N. Central Square (future)	0.00	0.60	0.00	0.06
Old Police Headquarters*	0.00	1.00	0.00	1.00
Pantoja Park	2.13	2.13	2.13	0.00
Park In the Park	2.80	2.80	0.00	0.00
Post Office Sq. (future)	0.00	0.60	0.00	0.60
Rose Park (future)	0.00	1.40	0.00	1.40
St. Joseph's (Cortez) (fut.)	0.00	1.15	0.00	1.15
SUBTOTAL	51.52	82.23	45.66	30.17
Joint Use				
Washington E.S.	1.05	1.05	1.05	0.00
SUBTOTAL	1.05	1.05	1.05	0.00
* VERIFY ACREAGE				
Total Park Acreage	52.57	83.28	46.71	30.17
	gross	developable	useable	future
			acres	acres
			developed	

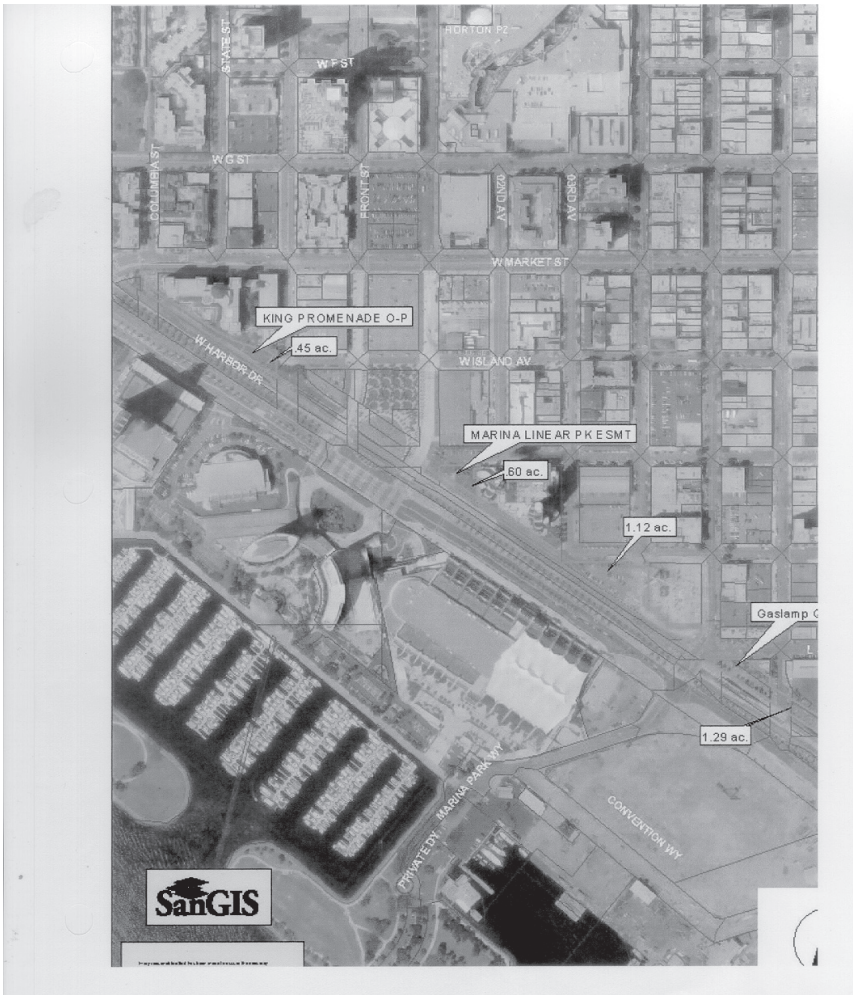
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COMMENTS

RESPONSES

Total Population-Based Acreage			
2004			
	52.57	acres existing	46.71 acres existing
	59.46	acres required	59.46 acres required
	(6.89)	deficit gross	(12.75) deficit useable
<hr/>			
2030			
	52.57	acres existing	46.71 acres existing
	30.17	future acres	30.17 future acres
	249.48	acres required	249.48 acres required
	(166.74)	deficit gross	(172.60) deficit useable
<hr/>			
Neighborhood and Community Park Population-Based Park Goals:			
Neighborhood Parks (10 ac./ 5,000 people)		Community Parks (20 ac./ 25,000 people)	
	Req. Park Acres	Required Ac. Minus Current Park Ac.	
2004	Neighborhood Park Ac.	42.47	4.24 surplus useable
	Community Park Ac.	16.99	(16.99) deficit useable
		59.46	(12.75) deficit useable
<hr/>			
2030	Neighborhood Park Ac.	178.20	(101.32) deficit useable
	Community Park Ac.	71.28	(71.28) deficit useable
		249.48	(172.60) deficit useable

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CityDUPPH2030.XLS Page 2





THE CITY OF SAN DIEGO

September 1, 2005

Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Subject: Review of the Traffic Sections of the Draft Downtown Community Plan dated June, 2005 and the EIR dated July, 2005

Dear Ms. Elias;

Thank you for giving us the opportunity to review the Traffic Sections of the Draft Downtown Community Plan and EIR. The following are our comments:

Community Plan:

- 1) Figure 7-1- Street Typologies Map- Columbia St and Commercial Street do not connect with a green street parallel to Harbor Drive as shown on this map.
- 2) Page 7-2 – last bullet- The City does not support the removal of Cedar Street off-ramp nor the conversion of Cedar Street from one-way to two-way traffic. This bullet should be removed as a significant change in the street system as indicated on this page. Also, remove any reference to the street cross sections that have been removed from this plan. This comment also pertains to the EIR.
- 3) Page 7-5 – Remove the photo and text indicating the “removal of the Cedar Street off-ramp. Also, remove any reference to the street cross sections that have been removed from this plan.
- 4) Each community plan in our City typically includes a Future Roadway Classification map and Future Average Daily Traffic map in the Transportation Section. Please include a map showing the Future Roadway Network Modifications that will be adopted as part of this plan update and a Future Average Daily Traffic map in the Transportation Section of the Community Plan. The Community Plan serves as the final adopted document that is frequently referenced by City Engineers in the future.

Transportation, Circulation, Access and Parking Section of the Draft EIR:

- 1) Page 5.2-19, Table 5.2-9: The following improvements that are identified in this Table are either opposed by the City or not supported in the Traffic Study:
 - Convert Cedar Street from Front St to Fifth Avenue to two-way, 2 lanes and removal of the off-ramp from I-5.



Planning Department
202 C Street, MS 5A • San Diego, CA 92101-3865
Tel (619) 236-6479 Fax (619) 236-6478

SEP 26 2005

Orig. To: _____
Copy To: _____

8.1
8.2
8.3
8.4

8.5

8.1 Comment noted. The referenced figure will be corrected as necessary.

8.2 Comment noted. The deletion of the Cedar Street off-ramp and the conversion of Cedar Street to two-way operation have been identified as a desirable improvements to the downtown roadway network. Actual removal of the off-ramp would only occur after further more detailed studies and approval of Caltrans. It should be noted that the deletion of the Cedar Street off-ramp has been identified as resulting in significant traffic impacts in the EIR.

8.3 See response to comment 8.2

8.4 Comment noted. Figure 7-1 of the Community Plan identifies the future roadway classifications. Inclusion of a map indicating future traffic volumes is not considered necessary.

8.5 See response to comment 8.2.

Page 2 of 2
Alexandra Elias
September 1, 2005

- 8.6 • Convert C Street from Park Blvd to I-5 to two-way, 2 lanes. Links to freeways should be maximized in capacity.
- 8.7 • Convert G Street from Front St to First Avenue to two-way, 3 lanes. This is not consistent with the one way street conversion recommended by CCDC for improved railroad crossings. Change to state; Convert G Street from Kettner Boulevard to First Avenue.
- 8.8 • Convert Sixth Avenue from I-5 to Ash Street to two-way, 2 lanes.
- 8.9 • Convert Eighth Avenue from Ash Street to G Street to one-way, 2 lanes.
- 8.10 • Reduce Ninth Avenue from Ash Street to Market Street from one-way, three lanes to one-way, two lanes.

The following additions are recommended:

- Open B Street from First St. to Third Street
- 8.11 2) Page 5.2-44: The EIR states that a number of intersections are not "feasible" mitigations measures. It is our understanding that they are feasible but not desirable because widening would have to occur. Please be clear on this distinction.
 - 8.12 3) Page 5.2-49, Mitigation Measures TRF-A.1-1, second sentence: Please change the word "evaluation" to read "traffic study."

If you have any questions, please do not hesitate to call me at 619-236-6496.

Sincerely,

Linda J. Marabian
Senior Traffic Engineer

cc: Keith Greer, Planning Department
Lara Gates, Planning Department
Charles Richmond, Development Services
Ann Gonsalves, Development Services
Deborah Van Wansele, Transportation Department

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- 8.6 The conversion of C Street between I-5 and Park Boulevard to two-way operation has been included with the objective of improving access and circulation to adjacent land uses in the area. The traffic analyses conducted as part of the EIR did not identify any resulting impacts associated with this modification.
- 8.7 The conversion of G Street from one-way to two-way operations from Front Street to First Avenue has been assumed as part of the Community Plan. Subsequent to the EIR traffic analyses, conversion of G Street from one-way to two-way operation from Kettner Blvd. to First Avenue was identified as part of an overall strategy to improve safety at the downtown at-grade rail crossings. This change will be noted and included in the Community Plan.
- 8.8 As noted, the EIR traffic analyses concluded that the conversion of Sixth Avenue from the existing one-way operation to two-way operation, between Ash Street and I-5, would result in significant and unmitigated traffic impacts. The proposed modification will therefore not be assumed as part of the Community Plan.
- 8.9 As noted, the EIR traffic analyses concluded that the reduction of Ninth Avenue from three lanes to two lanes between Ash Street and Market Street would result in unmitigated traffic impacts. The proposed modification will therefore not be assumed as part of the Community Plan.
- 8.10 Due to the potential for significant impacts on adjacent land uses (specifically the existing Community Concourse), the opening of B Street between First Street and Third Street has not been assumed as part of Community Plan.
- 8.11 The feasibility determination for the intersection mitigation measures was based upon an assessment of the physical availability of right-of-way to implement the required improvement. In a number of instances, limited building set backs along with required sidewalk widths, limited the feasibility of the required mitigation measures.
- 8.12 Comment noted. The suggested change will be incorporated.



THE CITY OF SAN DIEGO

IN REPLYING
PLEASE GIVE
OUR REF. NO.
59921

September 12, 2005

Alexandra Elias, Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Dear Ms. Elias:

On behalf of the San Diego Police Department, I would like to submit the following corrections to the law enforcement sections of Chapter 5.4, Public Facilities and Services, of the draft Downtown Community Plan EIR.

9.1 [It is stated in section 5.4.1.4, Law Enforcement, that the Central Division substation has a staff of 178 and serves a population of approximately 85,900. Currently, the population served by Central Division is approximately 86,700 and, as of the date of this letter, there are actually 160 officers working out of Central Division. In this section it is also stated that, "The officers are made up of detectives, community service officers, sergeants, lieutenants and a captain." A more accurate representation of the breakdown of these 160 officers would be to state that, "The officers are made up of patrol officers, detectives, sergeants, lieutenants and one captain."

9.2 [Also included in section 5.4.1.4 is reference to the Police Department's goal of maintaining an officer to population ratio of two officers per one thousand residents. This section states that, "Currently the ratio is 3.5 officers per 1,000 residents, which exceeds the established goal." In fact, the current ratio of officers to one thousand residents is 1.55.

9.3 [In addition, it is stated in section 5.4.1.4 that, "SDPD has recommended an increase in staff of 38 officers over the next five years, plus equipment, and an increase in civilian staff as well." After conducting a more detailed analysis of the anticipated growth in population in the downtown area and the corresponding increase in calls for service, the Police Department recommends the addition of 43 officers, four detectives, eight sergeants, two command staff, and five civilians, for a total of 62 additional personnel, over the next fifteen years.

9.4 [The existing Central Division substation, located at 2501 Imperial Avenue, will not accommodate the 62 additional personnel and, therefore, a new police substation in the northwest area of downtown would also need to be sited to support the demand for services. The need for



Office of the Chief of Police
1401 Broadway • San Diego, CA 92101-5729
Tel (619) 531-2000

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 14 2005

Orig. To: Alex

- 9.1 The updated information has been included in the FEIR. However, the updated information regarding police staffing does not change the conclusion of the EIR that the current police force would not be sufficient to meet the per capita goal of the police department.
- 9.2 Comment noted. CCDC is uncertain how the existing ratio was misstated. However, the updated information reflects a change in the current staffing levels and would not change the conclusion of the EIR that the current police force would not be sufficient to meet the per capita goal of the police department.
- 9.3 Comment noted. However, the updated information regarding police staffing does not change the conclusion of the EIR that the current police force would not be sufficient to meet the per capita goal of the police department.
- 9.4 While the comment indicates that a new substation would be required to accommodate the additional police staff needed to serve the buildout of downtown under the Proposed Community Plan, the EIR can not evaluate potential physical changes which may occur from this new substation. Because no specific site has been identified, any analysis would be speculative under Section 15145 of the CEQA Guidelines and need not be addressed in this EIR. Environmental review would be required at the time a specific site is identified.

Page 2
Draft Downtown Community Plan EIR
September 12, 2005

9.4
Cont.

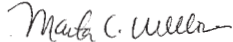
approximately 60 parking spaces for Department, employee, and public vehicles should be considered when identifying a site for the substation.

9.5

Section 5.4.3.1, Environmental Impacts/Demand for New or Expanded Public Service Facility, includes many references to the incorrect information described above. For consistency purposes throughout the law enforcement sections of the document, please ensure that the corrections to section 5.4.1.4 are also reflected in section 5.4.3.1.

Please contact me at (619) 531-2662 if you have any questions regarding this information.

Sincerely,



Marta C. Williams
Program Manager
San Diego Police Department
Facilities Management and Development Unit

cc: Howard Kendall, Acting Assistant Chief of Police, Training, Community Relations and Support Services
Bruce Pfefferkorn, Acting Assistant Chief of Police, Special Operations
Joel Bryden, Captain, Central Division
Chris Haley, Supervising Management Analyst, Crime Analysis Unit

5.4.3 Environmental Impacts
5.4.3.1 Demand for New or Expanded Public Service Facility

9.5 The text has been revised to reflect the updated information presented in the comment letter.



Air Pollution Control Board
 Greg Cox District 1
 Dianne Jacob District 2
 Pam Slater-Price District 3
 Ron Roberts District 4
 Bill Horn District 5

September 2, 2005

Alexandra Elias
 Centre City Development Corporation
 225 Broadway, Suite 1100
 San Diego, CA 92101-5074

**DISTRICT COMMENTS ON THE DEIR FOR
 THE PROPOSED DOWNTOWN COMMUNITY PLAN UPDATE**

The San Diego County Air Pollution Control District (District) has reviewed the subject Draft Environmental Impact Report (DEIR) and submits the following comments.

Relationship to Regional Air Quality Planning

The proposed plan emphasizes mixing of land uses, multiple dispersed recreation opportunities, development of walkable neighborhood centers, providing a better pedestrian environment overall, and increasing transit services. The various smart growth elements of the plan meet or exceed strategies outlined in the District's publication, *Tools for Reducing Vehicle Trips Through Land Use Design*. Providing more housing opportunities Downtown, where alternatives to automobile use are available and will be further enhanced, should result in lower regionwide mobile source emissions relative to the no-project scenario.

Construction-Related Emissions

The DEIR finds that localized particulate matter emissions from construction will be significant and commits to mitigation measures to reduce this impact. The list of strategies to reduce onsite generation of dust is appropriate. However, it is important to note that despite common use of such control strategies, the District receives numerous dust-related complaints from residents and businesses near construction sites throughout the County. CCDC should work with the District and the City of San Diego Development Services Department to ensure the stated mitigation measures are adhered to closely.

With regard to engine emissions from construction equipment, the DEIR states that "Emissions standards for new construction equipment require soot filters" (at 5.8-7). However, under the current regulatory schedule, particulate traps for off-road diesel engines will not be required for many years. In addition, there is no guarantee that new engines will be used on Downtown construction sites. Also, construction at different

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10.1

10.1 While CCDC has no direct authority to assure implementation of dust control, the City of San Diego would, through its Grading Ordinance.

10.2


sites may expose residents for a number of years without respite, with more continuous exposure for those who both live and work Downtown. Accordingly, Mitigation Measures 8, 12, and 13 (section 5.8.4) requiring use of alternative-fueled and/or particulate filter-equipped construction equipment, where feasible, is appropriate. However, for situations in which use of alternative-fueled or particulate filter-equipped equipment is not feasible, an additional mitigation measure should be added which requires construction contractors operating Downtown to use their newest, least-polluting equipment whenever possible.

Co-Location With Industrial Uses

Another area of concern is the potential exposure of sensitive populations to acutely toxic materials, or long-term exposure to sub-acute levels of potentially carcinogenic materials. The DEIR finds that the Plan will discourage the development of new industrial sources within the Plan boundaries. However, the potential exists to locate intensive residential, commercial, or mixed uses in close proximity to existing industrial uses at the southwest corner of the plan area, and near freeways. Appropriately, the DEIR gives consideration to the California Air Resources Board's recently issued guidance, *Air Quality and Land Use Handbook: A Community Health Perspective*. Planning for sensitive land uses in areas closest to the sources examined in this guidance should consider localized patterns of emissions, meteorology, occupation of proposed land uses, and wind patterns that may affect on-site exposure. The setbacks described in the ARB guidance and discussed in the DEIR (at 5.8-10) should be implemented whenever possible.

Thank you for the opportunity to comment. Please feel free to contact me with any questions, at 858-650-4671 or andy.hamilton@sdcounty.ca.gov.

Sincerely,


Andy Hamilton
Air Quality Specialist

CENTRE CITY
DEVELOPMENT
CORPORATION
SEP 7 2005
Orig. To: _____
Copy To: _____

10.2 The following provision has been added to Mitigation Measure AQ-B.1:

If alternative-fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible.



SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools
Rudy M. Costruito, Ed.D.

August 22, 2005

Alexandra Elias
Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

234.0381

RE: Response to Notice of Preparation of a Draft Program Environmental Impact Report (EIR)

Dear Ms. Elias:

The San Diego County Office of Education (COE) is in receipt of the Notice of Availability for a Draft Environmental Impact Report (EIR) for San Diego Downtown Community Plan, and amendments to the Redevelopment Plan for Centre City Project Area and Planned District Ordinance. This letter constitutes our response to the notice.

The COE provides a variety of school and educational services to County residents. Unlike local school districts, the COE provides its services throughout the County, making it the equivalent of a countywide school district. As a result, the COE is affected by new development wherever it occurs in the County.

Some COE programs provide direct services to students, including children (infants, pre-school, and students in grades K-12) as well as adults. Other COE services are provided through public schools, including all forty-two school districts and all five community college districts in the County. These services include staff development for teachers and current and prospective administrators as well as numerous management support services. The following COE programs may be affected by the Draft Environmental Impact Report (EIR) for San Diego Downtown Community Plan, and amendments to the Redevelopment Plan for Centre City Project Area and Planned District Ordinance:

- Regional Occupation Program
- Hope Infant Handicapped Program
- Migrant Education Program
- Outdoor Education Program
- Teacher Training and Development
- Administration Training and Development
- COE Administration

CENTRE CITY
DEVELOPMENT
CORPORATION

AUG 29 2005

Orig. To: _____

Copy To: _____

Board of Education

Nick Aguilar Ernest J. Dronenburg, Jr. Susan Hartley Robert J. Watkins John Witt

SERVICE AND LEADERSHIP

11.1

11.1 Comment noted. While the operations of the COE may be affected by the increased number of residential units downtown, the focus of the EIR was on the San Diego Unified School District because specific schools within and around downtown would be directly impacted by future students. Furthermore, if future residential demand is not met in the downtown, other areas of the county would likely experience more growth than may have been assumed by the COE. Thus, serving an expanding population would face COE regardless of whether the Proposed Community Plan is approved.

COMMENTS

RESPONSES

Page 2
Response to Notice of Preparation
of a Draft Program Environmental Impact Report (EIR)

11.2

We encourage and support cities and counties in the use of the redevelopment process and tax increment revenues for the elimination of blight and to improve the economic viability of areas. However, school districts and the COE will be impacted due to increases in population.

11.3

Based on the future 53,100 residential units the local school district and the COE will be impacted. The student yield factor used in the draft EIR to generate the number of students is to conservative. We feel a more realistic yield factor, which is recommended by the state is, 0.5 for Elementary School Districts, 0.2 for High School Districts and 0.7 for Unified School Districts.

We look forward to working with the Agency to reduce or fully mitigate these impacts in creative and mutually beneficial ways when possible. If you have any questions regarding this correspondence, please feel free to contact me at (858) 292-3680.

11.2 Comment noted with respect to the impact of increased population on schools. However, the use of redevelopment and tax increment funding is not an issue which is required to be addressed under CEQA.

11.3 The student generation rates were derived from direct consultation with the Instruction Facilities Planning Department of the San Diego Unified School District.

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
619.406.2400 WWW.SAN.ORG

September 12, 2005

Centre City Development Corporation
Attn: Ms. Alexandra Elias
225 Broadway, Suite 1100
San Diego, CA 92101-5074

SUBJECT: Draft Environmental Impact Report for the San Diego Downtown
Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for
the Centre City Area (SCH #2003041001)

Dear Ms. Elias:

Thank you for the opportunity to review and comment on the Centre City Development Corporation's (CCDC's) Proposed Downtown Community Plan Update; Environmental Impact Report (EIR) and Planned District Ordinance (PDO). The San Diego County Regional Airport Authority (Authority), acting in its capacity as the Airport Land Use Commission (ALUC) for San Diego County and the operator of San Diego International Airport, has a direct interest in the land use policies that the Downtown Community Plan Update, EIR and PDO will contain. To assist you in addressing these comments, the Authority has identified comments first as they relate to the Airport Land Use Commission consistency determination process for the Community Plan Update and second to the Airport Land Use Compatibility Plan (ALUCP) and San Diego International Airport.

ALUC Consistency Determination Process for the Community Plan Update

One of the fundamental responsibilities of the ALUC, as defined by Section 21670.3 of the California Public Utilities Code, is to coordinate with municipalities and airport operators on land use issues surrounding airports within San Diego County and review local agencies' land use plans, airport plans and certain other land use projects for compliance with the criteria and policies set forth in the applicable Airport Land Use Compatibility Plan (ALUCP). The purpose of this requirement is to minimize the public's exposure to excessive noise and safety hazards within the areas around public and military airports - to the extent that these areas are not already developed with incompatible uses. The manner in which this function is accomplished is through the enforcement of the ALUCP land use compatibility policies.

As you are aware, the Authority is currently in the process of preparing an updated ALUCP that includes all of the public-use and military-use airports in the County. This ALUCP will provide for the orderly growth of each airport, and the area surrounding each airport within the Authority's jurisdiction, and will provide policies to safeguard

SAN DIEGO
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CORPORATION

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Orig. To: _____
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Centre City Development Corporation
Ms. Alexandra Elias
September 12, 2005
Page 3 of 6

In an effort to support a more efficient use of your staff's time, the Authority would propose to work with your staff prior to the adoption of the Downtown Community Plan Update and PDO to incorporate as many of the noise and safety constraints identified in the ALUCP as feasible. During the past year Authority staff has been working cooperatively with City staff to address the concerns regarding potential land use conflicts between the draft ALUCP's noise and safety restrictions and the future land use desires of the City and CCDC, and to assist the City in ensuring compatible land uses in the vicinity of those airports. We would suggest scheduling meetings between Authority staff and CCDC staff in an attempt to resolve as many issues as possible and allow the Downtown Community Plan Update and PDO amendments to go forward containing policies that will reflect the ALUCP criteria. We recognize that there may be several outstanding ALUCP policy issues that staff may not be able to resolve, and will require direction from the ALUC, but to the extent that we can craft language that serves both our purposes, we would recommend revising the draft Downtown Community Plan documents at this time.

Authority staff would request an opportunity to meet with your staff to provide appropriate revised language at your earliest convenience. We look forward to our continued discussion of the development of the draft Downtown Community Plan Update and amendments to the PDO, taking into consideration the requirements of the ALUCP update and the needs of both agencies to work towards the protection of both the airports and the people of the City.

Please contact Linda Johnson at (619) 400-2463 if you have any questions related to the consistency determination or to schedule a meeting.

Airport Land Use Compatibility Plan and San Diego International Airport

The adopted San Diego International Airport (SDIA) Airport Land Use Compatibility Plan (ALUCP) provides a land use plan for the environs surrounding SDIA, based on noise contour maps and runway protection zones. The ALUCP provides projected noise contours that are important for determining the compatibility of land uses around the airport. It identifies certain land uses as being compatible, conditionally compatible or incompatible with airport uses; and requires mitigation, including sound attenuation and aviation easements for certain development projects that are located within the Airport Influence Area (AIA).

The SDIA ALUCP also establishes land use restrictions in Runway Protection Zone (RPZ) and safety areas to preclude incompatible development from intruding into areas of significant risk resulting from aircraft takeoff, landing and pattern operations.

Centre City Development Corporation
Ms. Alexandra Elias
September 12, 2005
Page 3 of 6

In an effort to support a more efficient use of your staff's time, the Authority would propose to work with your staff prior to the adoption of the Downtown Community Plan Update and PDO to incorporate as many of the noise and safety constraints identified in the ALUCP as feasible. During the past year Authority staff has been working cooperatively with City staff to address the concerns regarding potential land use conflicts between the draft ALUCP's noise and safety restrictions and the future land use desires of the City and CCDC, and to assist the City in ensuring compatible land uses in the vicinity of those airports. We would suggest scheduling meetings between Authority staff and CCDC staff in an attempt to resolve as many issues as possible and allow the Downtown Community Plan Update and PDO amendments to go forward containing policies that will reflect the ALUCP criteria. We recognize that there may be several outstanding ALUCP policy issues that staff may not be able to resolve, and will require direction from the ALUC, but to the extent that we can craft language that serves both our purposes, we would recommend revising the draft Downtown Community Plan documents at this time.

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The SDIA ALUCP also establishes land use restrictions in Runway Protection Zone (RPZ) and safety areas to preclude incompatible development from intruding into areas of significant risk resulting from aircraft takeoff, landing and pattern operations.

Centre City Development Corporation
 Ms. Alexandra Elias
 September 12, 2005
 Page 4 of 6

The height of all structures must be reviewed by the CCDC/City to ensure that they conform to Federal Aviation Regulation (FAR) Part 77 Guidelines, using the site development plan review procedure. Any use found to be a "hazard" or an "obstruction which would have a significant adverse impact" by the Federal Aviation Administration (FAA) should be determined not to be in conformance with the ALUCP.

The SDIA ALUCP also imposes density limitations that limit the maximum number of dwellings or people in areas close to the Airport in order to reduce the potential severity of an aircraft accident. Any proposed project located within the Airport Approach Overlay Zone (AAOZ), with certain limited exceptions, may not "intensify human occupancy of the site to an extent greater than 110 percent of the average intensity of existing uses . . . within a one quarter mile radius of the project site."

While the DEIR correctly identifies that the SDIA ALUCP is applicable to development that will occur in the area subject to the provisions of the AIA, the DEIR, particularly Section 5.1.3.1, does not provide an adequate analysis of the implementation of ALUCP policies. There are provisions of the Downtown Community Plan that could result in conflicts or inconsistencies of the provisions of the ALUCP, particularly regarding location of land uses that will increase the number of sensitive receptors in noise impacted areas and the increase in intensity of development in noise impacted areas. The DEIR should provide a detailed analysis of the plan's consistency with the ALUCP policies regarding development in the AIA and the RPZ.

Two of the areas that are of critical concern for SDIA are the Little Italy and Cortez neighborhoods. These areas are located under the approach for the Airport's Runway 27 and departure for Runway 9. These areas are subject to noise generated by arriving and departing aircraft, and uses in this area should be compatible with the on-going operations of a major international airport. As such, the intensity and scale of development in this area are of critical importance.

The majority of the Little Italy neighborhood has been designated for "Mixed Commercial" uses. Unfortunately, the DEIR does not provide a description of the "Mixed Commercial" land use classification, making it difficult to judge the scale and intensity of proposed development in areas subject to this classification. The document should be modified to explicitly define "Mixed Commercial" with sufficient specificity to determine if the proposed uses will be compatible with airport operations.

In addition, the "Core" and "Employment/Residential Mixed Use" land use classifications applied to the remainder of Little Italy lack sufficient specificity to determine what impacts, if any, will result from their application to the Little Italy area, other than the proposed buildout totals provided in Table 4.1-2. The DEIR should

12.1

12.2

12.3

12.1 In response to this comment, CCDC conducted a focused analysis of the proposed uses in the general areas of concern in the Cortez and Little Italy neighborhoods. The analysis focused on the following three issues: (1) proposed intensity of uses, (2) proposed types of uses, and (3) proposed mix of uses.

The proposed intensity of uses is regulated both in the current and proposed Centre City Planned District Ordinances by Floor Area Ratio (or "FAR"). Neither the existing, nor the proposed PDO, contains regulation of units per acre for residential uses. The FAR is the square footage of a proposed development divided by the site square footage. In the areas subject to airport noise and safety requirements, the proposed Centre City PDO contains exactly the same FARs as the existing PDO. Therefore, no increased intensity of uses in those areas is anticipated under the proposed PDO.

Uses that are allowed in the zones contained in the existing and proposed land use districts, especially pertaining to the following noise sensitive receptors (as defined in the Noise Analysis Chapter 5.7) are virtually unchanged as well, as shown in the following table (see Proposed Centre City PDO for specific zone requirements, as these uses have been generalized for discussion purposes):

COMMENTS

RESPONSES

Land Use	Existing PDO	Proposed PDO
Multifamily Residential	P	P
Group Residential	P	P
Live/Work	P	P
Living Units/Single Room Occupancy units	C	C
Senior Housing	C	C
Hospitals	P	P
Colleges & universities	P	P
Performing Arts Theatres	P	P
Religious Assembly	P	P

The analysis demonstrates that the proposed PDO is equivalent, if not more restrictive, than the existing PDO for land uses of specific concern (residential and other “sensitive receptors”).

Finally, downtown is a mixed use environment. Currently, residential uses are allowed throughout downtown, and in some areas (including a portion of Cortez) there is an incentive (in the form of a floor area bonus) for the provision of residential. While the proposed PDO contains incentives for the provision of certain types of housing (affordable and/or family units, for example), it does not provide incentives for general residential. Also, currently, up to 100% of any development may be residential in Cortez and Little Italy, with the exception of a requirement for “Street Level Uses” (or active commercial uses) on a portion of India Street. The land use districts in the proposed PDO require a minimum of 40% (or 80%) ground floor commercial or in some cases not more than 20% ground floor commercial. The areas where these requirements apply cover considerably more area in the proposed PDO than under the existing PDO. Therefore, the analysis shows that the proposed PDO could be expected to result in less residential in the mix of uses than under the existing PDO.

Lastly, application of the guidelines and regulations imposed by the combination of the City’s Proposed Community Plan, Planned District Ordinance, Airport Approach Overlay Zone (AAOZ), and the Airport Environs Overlay Zone (AEOZ) would assure consistency with the existing ACLUCP.

12.2 The proposed Planned District Ordinance provides the more specific level of detail for the types of uses allowed within the Mixed Commercial District. In the PDO, the Mixed Commercial (MC) District is defined as follows:

This district accommodates a diverse, array of uses, including residential, artists' studios, live/work spaces, hotels, offices, research and development, and retail. Commercial and service uses, including light industrial and repair, warehousing and distribution, transportation and communication services that are essential for the livelihood of businesses and residents of the downtown area are also permitted. With the Mixed Commercial District, no more than 20 percent of the ground floor street frontage may be active commercial uses.

A more specific list of uses is contained in the proposed PDO. As indicated, some of the uses are allowed "by right" while others require a permit to assure that the uses are appropriate for the area.

12.3 Section 4.5.2.1 of the EIR provides information on the types of uses allowed under the various land use classifications as well as planned development intensities.

COMMENTS

RESPONSES

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provide additional detailed information regarding the types and intensity of uses allowed under these designations.

12.4

Impact LU-B3 on page 5.1-19 identifies aircraft noise as a significant impact. The DEIR states that "(n)oise incompatibility occurs when noise generators are located near sensitive noise receivers." Aircraft noise is an existing baseline condition in the Little Italy and Cortez neighborhoods and is not a result of the adoption or implementation of the Downtown Community Plan and Redevelopment Plan. The DEIR should be revised to indicate that the implementation of the Plans would significantly increase the number of sensitive receptors that would at buildout be located in areas subject to aircraft noise in excess of 65 dB CNEL.

12.5

Policy 5.3-P-1 states that building heights will be restricted "in the approach zone to Lindbergh Field, as required by the Federal Aviation Administration (FAA)." This should be revised to include restrictions on building height under the ALUCP.

12.6

In Chapter 5.2, Impact TRF-A.2.1 identifies that traffic volumes at buildout would have significant impacts on freeways serving downtown, including significant impacts to the southbound I-5 onramp at Grape Street, with levels of service "F" in the AM and PM peak hours. This is of importance to the SDCRAA as the Grape Street onramp to southbound I-5 is an important route for traffic leaving SDIA. It is not clear from the document whether the cumulative impact analysis includes anticipated traffic growth resulting from increased passenger activity at SDIA. The DEIR should include the forecast passenger activity growth at SDIA along with all other applicable regional plans. Similarly, Impact TRF-A.1.2 should analyze traffic volumes on major streets in the neighborhoods surrounding the Downtown Community Plan area including increased traffic anticipated to occur as a result of additional forecast passenger activity at SDIA.

12.7

In Chapter 5.7, the analysis indicates that state and city building requirements mandate that residential and transient occupancy buildings (i.e., habitable rooms) should be attenuated to 45 dB on the interiors. However, the mitigation measures do not adequately demonstrate how this measure will be implemented. In areas where aircraft noise exists, mitigation measures should be adopted and enforced to demonstrate that these land uses will be attenuated to 45 dB on the interior of the structures through the use of sound insulation and an acoustical study prior to the certificate of occupancy. After this is completed, an avigation easement should be required to be issued to the airport operator.

Again, thank you for the opportunity to comment on the Draft Environmental Impact Report for the San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Area. If you have any

12.4 As indicated in response to comment 12.1, the Proposed Community Plan would not substantially increase the number of sensitive uses over that which would already occur under the adopted Community Plan.

12.5 The proposed policy will be changed in the Proposed Community Plan to refer to the Airport Approach Overlay Zone. This would supercede the EIR version.

12.6 Expansion of the SDIA is assumed in the SANDAG Series 10 forecast which was the basis for the transportation model which was used in the traffic analysis.

12.7 Noise attenuation is already required under UBC and AEOZ. These regulations require the provision of acoustical studies and plan check review to assure compliance with interior noise limits. In addition, the AEOZ requires avigation easement in areas over 65 CNEL prior to issuance of building permit.

COMMENTS

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questions regarding San Diego International Airport, please contact Ted Anasis at
(619) 400-2478.

Sincerely,



Angela Shafer-Payne
Vice President, Strategic Planning
San Diego County Regional Airport Authority

cc: Board Members, SDCRAA
Thella F. Bowens, President/CEO, SDCRAA
Breton K. Lobner, General Counsel, SDCRAA



September 9, 2005

Alexandra Elias
 Centre City Development Corporation
 225 Broadway Street, Suite 1100
 San Diego, California 92101-5074

Re: Comments on the Updated Downtown Community Plan and Redevelopment Plan

Dear Alex:

SDG&E appreciates the opportunity to review and comment on the above referenced project. Since we provided comments on this project in April 2005, SDG&E has developed some additional information that has been attached for your use and review that may be helpful in developing your plan. These documents are as follows:

- Electric Transmission Relocation Guidelines
- Contact information to assist you in verifying the location and disposition of existing SDG&E facilities near your project;
- Contact information for SDG&E Land Use and Natural Resource Personnel
- SDG&E Environmental Document Preparation Guidelines for Energy
- SDG&E Land Use Design Policy Recommendations
- SDG&E's Ability and Plan to Provide Service: The Long -Term Resource Plan

Furthermore, in keeping with the City's draft General Plan Update elements, SDG&E has several existing programs that meet the intent of the draft General Plan's goals, guidelines and standards that may be appropriate to be reflected within the context of the Downtown Community Plan. These SDG&E programs include:

- SDG&E Existing Residential and Business Energy Efficiency Programs
- SDG&E California Energy Star New Homes Program
- SDG&E Savings by Design Program
- SDG&E Energy Efficiency Construction Training

CENTRE CITY
 DEVELOPMENT
 CORPORATION

SEP 13 2005

Orig. To: _____

Copy To: _____

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13.1

Finally, when locating future electric facilities, SDG&E's goal is to provide safe and reliable service to 1.3 million customers in the region while placing new facilities in compatible land use areas. The locating and permitting of electric facilities such as substations are scrutinized by the California Public Utilities Commission (CPUC), the City and the communities we serve. Also, more often than not, these new facilities require a rigorous public, environmental review process.

Conversely, future residential projects that are proposed adjacent to our existing electric facilities can create concerns and conflicts that should be addressed by developers and the City before a project is approved. Unfortunately, these issues may not receive appropriate, timely consideration, due to a lack of understanding of the facilities' operational issues by the City and/or the developer and perhaps exclusion of SDG&E's involvement upfront.

While a buffer zone or transition zone within industrial, commercial or mixed use areas around SDG&E facilities may be a solution, it is overly simplistic to believe a one-size-fits-all buffer zone will resolve future conflicts particularly in the dense mixed use environment of the downtown area. There will be instances where no buffer zone is necessary and other times where a wider buffer may be appropriate, depending on the type of facilities and surrounding land uses and times where the placement of a typical buffer is not feasible.

SDG&E suggests that the Downtown Community Plan include a mechanism to allow careful scrutiny and review by the planning staff to address these land use and electrical facility compatibility issues so that SDG&E can become involved early in the process to that all affected parties have an opportunity to develop prudent and equitable solutions.

SDG&E would be happy to meet with you and the CCDC team to further discuss ways in which we can partner to assist in achieving the important goals of the Community Plan Update, land use compatibility issues. To find out more about some of the programs outlined previously, visit our web site at <http://www.sdge.com/construction>. Please feel free to contact me with any questions or comments at (858) 637-3713 or in writing at 8315 Century Park Court, CP21E, San Diego, California 92123.

Sincerely,



Christopher P. Terzich, REA
 Principal Environmental Specialist, Land Planning

Attachments

13.1 CCDC will work with SDGE in the event future development is proposed adjacent to any of its facilities which could pose a health and safety risk to future occupants. Such conflicts will be identified during the Secondary Study which will be required for new developments. As noted in the comment, each development offers a different potential conflict. Therefore, buffers or other measures are best identified on a development-by-development basis during the Secondary Study process.

SDG&E's Ability and Plan to Provide Service:**The Long –Term Resource Plan****Energy Outlook and Resources**

-- Cost-effective energy efficiency programs are estimated to reduce SDG&E's energy requirements by an additional 9% by 2014. This result is in addition to the accomplishments of SDG&E's past energy efficiency programs, which have already reduced energy needs by roughly 10%.

-- Renewable resources are planned to provide 20% of SDG&E's energy needs in 2010, increasing to 24% by 2014.

-- After accounting for the substantial reductions in energy needs resulting from SDG&E's past and future aggressive and highly successful energy efficiency programs, remaining average year annual energy needs are substantially met by existing SDG&E resources, CDWR contract allocations, and renewable purchases through 2010. In a less probable high-demand year (for example, sustained hot weather), the additional energy will come from additional purchases from the market and from local generation added primarily for grid reliability, as explained further below.

-- As allocated CDWR contracts begin to expire in 2008 and beyond, additional energy resources will be needed. By 2011, approximately 25% of average year energy will come from resource additions, including additional renewable purchases, on- and off-system generation, and purchases from the market, facilitated by the additional import capability provided by the added transmission interconnection.

Capacity Outlook

--Cost-effective energy efficiency and response resources are estimated to meet 10% of San Diego's total capacity need in year 2014.

--By provided 20% of SDG&E's retail energy needs in 2010, renewable resources are estimated to meet roughly 10% of San Diego's total capacity need in that year and 11% in 2014.

-- Beginning in 2011, additional renewable and conventional generation will be needed, including additional on-system resources to meet grid reliability criteria, and a portion of the resource need created by load growth and expiration of the CDWR contracts. If Sunrise were to be reallocated, the timing of these additions would likely change as would the resulting Reliability Must Run (RMR) cost reduction since SDG&E would have "headroom" to accelerate additions of on-system resources.

-- Pursuant to SDG&E's Balanced Portfolio Strategy, a portion of these needed resources are expected to come from on-system resources, and a portion from off-system. While these projections represent a reasonable set of assumptions made years in advance of specific project proposals, SDG&E observes that there may be fine tuning of exact year of need, resource types (for example, a based loaded versus an intermediate loaded plant), and plant location (for example, an on-system resource versus an off-system one).

Transmission Implications

-- By 2010, the plan calls for an additional major transmission project to comply with ISO Grid Planning Criteria, displace existing high-cost RMR generation, provide for the potential retirement of aging local units, deliver additional off system generation—renewable and conventional—to lower costs, increase supply diversity, and replace a portion of the expiring CDWR contracts. SDG&E believes that the benefits of added transmission infrastructure, as described in the testimony of Witness Brown make it a required element of any SDG&E resource portfolio. SDG&E therefore seeks specific authorization in this proceeding to pursue the necessary project approvals to fill this 2010 need. As SDG&E pointed out last year, the question is not whether additional transmission is beneficial; it is how much of a resource portfolio is delivered through transmission rather than on-system generation options to meet resource gaps not filled through energy efficiency and demand response alternatives. In addition, whether SDG&E has the ability to successfully complete these projects in the time frames indicated could impact SDG&E's ability to meet the goal of achieving a 20% renewable energy supply by 2010.

Fuel Diversity

-- SDG&E's ability to add fuel diverse resources is constrained by the nature of its service territory, public policy, and possible limited availability of nonfossil resources. There are few hydro resources in San Diego, and there is no policy support for either local coal-based or additional nuclear resources. Thus, the plan depends on renewable resources (both supply-side and customer-side distributed renewable generation) for fuel diversity, although there is a potential that off-system purchases will come from coal and nuclear plants outside the service territory, further contributing to fuel diversity.

-- The addition of Liquefied Natural Gas (LNG) supplies to California's gas resource mix would provide an opportunity to further diversify the geographical location, delivery system, and cost components of the fuel supply for the gas-fired portion of SDG&E's preferred plan.

Source:

Order Instituting Rulemaking To Promote Policy And Program Coordination And Integration In Electric Utility Resource Planning R.04-04-003, Long-Term Resource Plan Of San Diego Gas & Electric Company (U 902 E) Direct Testimony Before The Public Utilities Commission Of The State Of California, July 9, 2004

Full Text Link:

http://www.sdenergy.org/uploads/7-9-04SDG&E_LTRP.pdf

Statewide Program:

<http://www.cpuc.ca.gov/PUBLISHED/REPORT/49078.htm>

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SDG&E LAND USE DESIGN POLICY RECOMMENDATIONS

ENERGY FACILITIES

It has become increasingly important to ensure that adequate energy supplies and the means to transmit and convey energy are provided to the built environment. Because the built environment requires energy resources to operate and energy facilities require physical space to produce and convey this critical commodity, energy facilities should be considered a type of land use that requires integration into our land use planning efforts. Given the increasingly urban nature of southern California, the scarcity of suitable facility sites and the sensitivity of conserved resource areas, natural gas and electrical facility planning should become an integral part of all land planning efforts.

Goal: Sensible and efficient electrical and natural gas facility integration into the natural and developed environment.

Objectives:

- Use existing transmission corridors as effective wildlife corridors.
- Provide additional open space buffering between utility facilities and residential development.
- Ensure adequate area is reserved early in the development process for critical electrical service facilities.
- Provide opportunities for other appropriate land uses to be located within overhead electrical facility alignment areas.
- Assure that utility facilities safely integrate into the developed landscape.

Land Use Policies

Energy

- Development located within or adjacent to multiple species habitat plan preserve areas, adjacent to overhead electrical transmission lines and/or easements should incorporate additional open space buffers to maintain a minimum 400-foot width along transmission line routes in areas that would provide connectivity between designated or planned open space multiple species preserves.



- Residential development proposed adjacent to other overhead electrical transmission lines and/or easements should incorporate additional open space, non-building area or rear yard setbacks to provide greater buffering from the transmission facilities.
- Additional open space or non-building area buffer should be integrated into new residential development or redevelopment located adjacent to existing or planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities.
- Redevelopment plans, community plan updates, general plan amendments, new master plans or similar larger scale developments that are located one mile or more from an existing substation should contact SDG&E to determine whether a set aside area of a minimum of two acres net usable pad area is necessary to accommodate a new substation facility based on increased electrical demand. The set aside area for the substation site should be located adjacent to proposed major arterial roadways and intersections and/or existing or planned electrical transmission rights of way. Also, additional right-of-way/corridor area for any necessary extension of transmission lines/facilities to serve the substation should be integrated into the plans. Coordination with SDG&E as to the location and size of the set aside area is essential and should be completed early in the process of formulating the plan, update or amendment. The set aside area can be designated with appropriate alternate land uses in the event the site is not needed for utility use.
- Appropriate secondary land uses should be encouraged to be located within overhead transmission facility rights-of-way when appropriate and could include natural open space, passive parkland, plant nurseries, parking lots, private roads, access ways and driveways based on final review and approval of SDG&E. Trails can also be included as a secondary land use as long as proper indemnification, funding and maintenance language is set forth in a written agreement between SDG&E and the agency and project developer.
- Landscape trees, shrubs and groundcover associated with new development or redevelopment around existing and planned gas and overhead or aboveground electrical facilities should conform to SDG&E's landscape guidelines.

COMMENTS

RESPONSES

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**SDG&E Land Use and Natural Resource Issues
Contacts:**

**Don Haines, AICP, Manager, Land Planning Natural
Resources, SDG&E Environmental Solutions Department**

(858) 637-3708, dehaines@SempraUtilities.com

Mark Chomyn, AICP, Team Lead

(858) 637-3709, mchomyn@SempraUtilities.com

Chris Terzich, REA, Principal Land Planner

(858) 637-3713, cterzich@SempraUtilities.com

Beverly Blessent, AICP, Senior Land Planner

(858) 637-3702, bblessent@SempraUtilities.com

Dash Meeks, AICP, Senior Land Planner

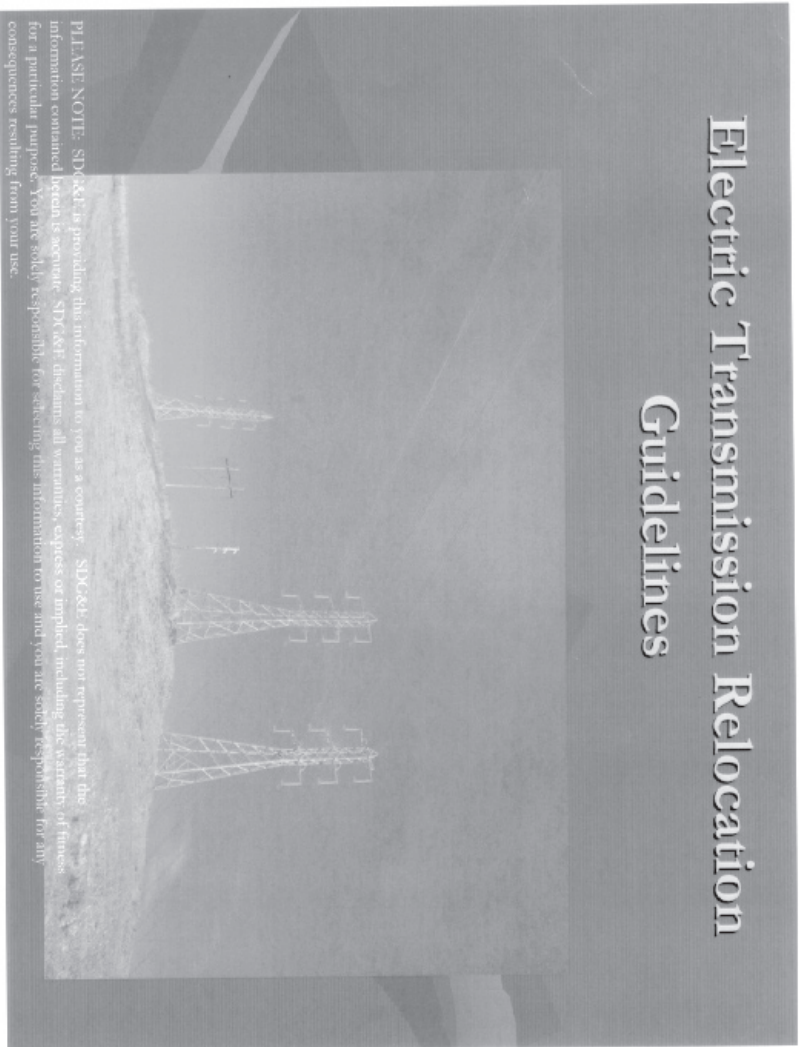
(858) 637-3711, Dmeeks@SempraUtilities.com

Shannon Keithley, Senior Land Planner

(858) 637-3715, skeithley@SempraUtilities.com

Shannon Turek, Land Planner


(858) 637-3712, sturek@SempraUtilities.com



Guidelines for Electric Transmission Line Relocations


- Guidelines are available to provide assistance to Developers and Local Agencies preparing discussions of electric utility construction or relocation activities in CEQA environmental documents (EIR, MND, ND) addressing the "whole of the action" for their larger projects.
- An adequate discussion of utility activities in the CEQA documents for larger Developer or Agency projects can support SDG&E's claim of exemption from the permitting requirements of the California Public Utilities Commission (CPUC), General Order 131-D (GO 131-D).
- An exemption from CPUC permitting would save time and costs for installing the utility facilities that are part of a Developer's or Agency's larger project. In cases where SDG&E cannot make a claim of exemption, the use a CEQA document prepared by a Developer or Agency as the environmental document for CPUC permitting would have the potential to reduce that permitting timeframe.

Theoretical
Transmission Line Relocation – Rancho



- EIR must describe and analyze all impacts and provide mitigation for the relocation to avoid:
- Piecemealing
- Supplemental, Subsequent EIR or Addendum to meet the requirements of CPUC GO 131D
- Costly construction delay of six months or more
- Impacts are mostly associated with biological resources, visual/aesthetics, construction, land use and cultural/paleontological.

Transmission Line Relocation – Rancho Theoretical (continued)

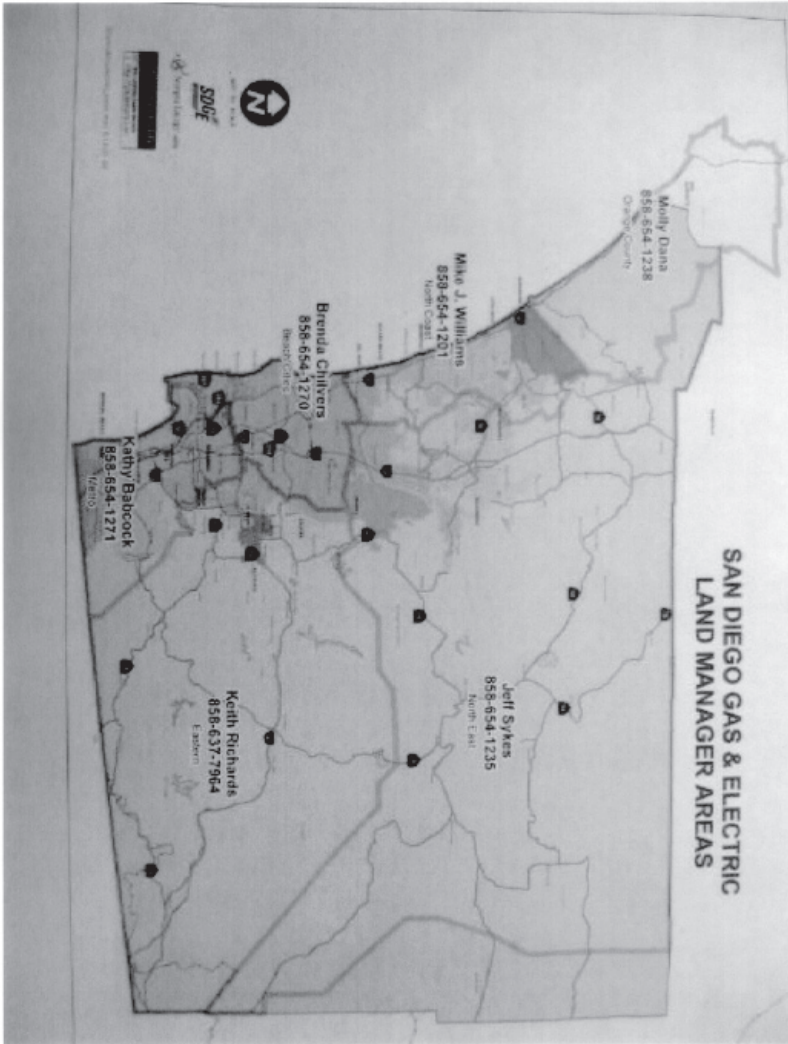


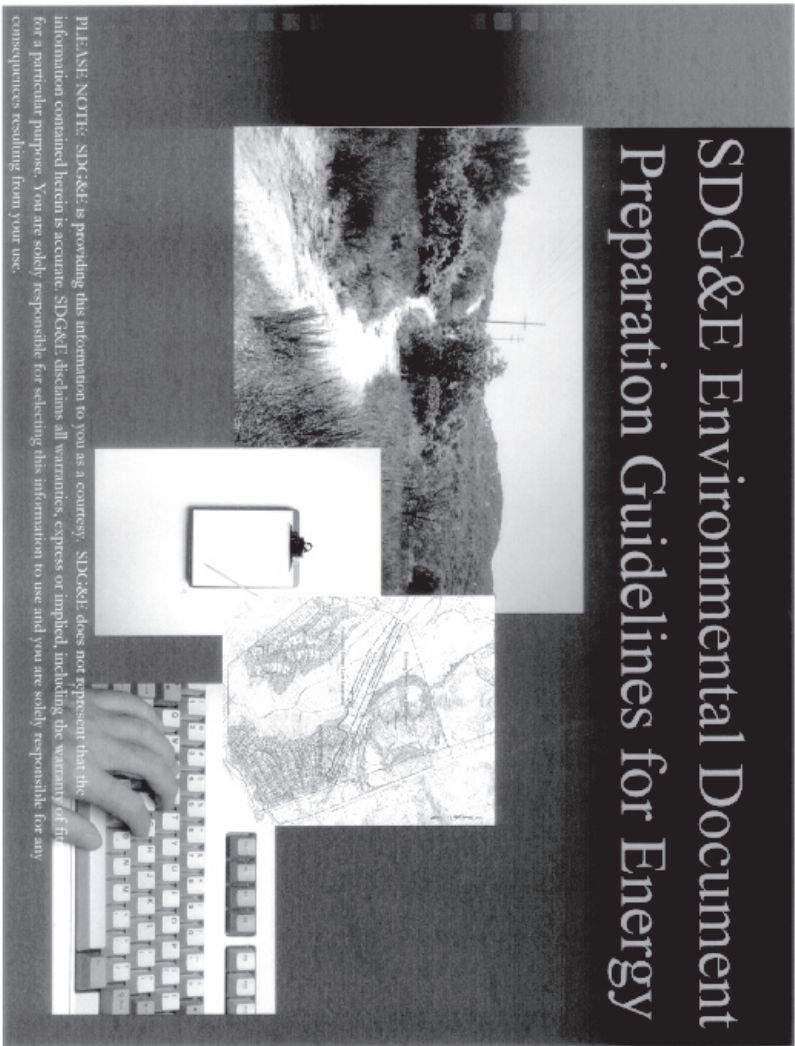
The map displays a topographic view of a landscape with contour lines. A grey shaded area represents the 'Existing Power Line Easement', which follows a path across the terrain. A darker grey shaded area represents the 'Proposed Power Line Easement', which is shown as a more direct route. A central area is labeled 'Underground', indicating the planned location for the new power lines. The map also shows some buildings and roads in the lower-left quadrant.

- EIR relocation analysis should include:
 - Impacts associated with removal of existing poles and related facilities
 - Impacts from trenching for underground facilities located outside of the development footprint
 - Impacts from access road construction, pulling sites and pole excavation for overhead facilities
- Contact SDG&E early in the EIR preparation process for guidelines to assist in determining these impacts.

- Contacts to Determine the Location and Disposition of SDG&E Facilities
- SDG&E Land Managers will assist with:
 - The location of SDG&E facilities, rights-of-way or property
 - Utility relocation issues
 - The use of or encroachment into rights-of-way and easements and associated access
 - Residential subdivisions and other projects proposed adjacent to SDG&E facilities, easements or rights-of-way
 - SDG&E Land Manager contacts are assigned geographically as shown on the following slide

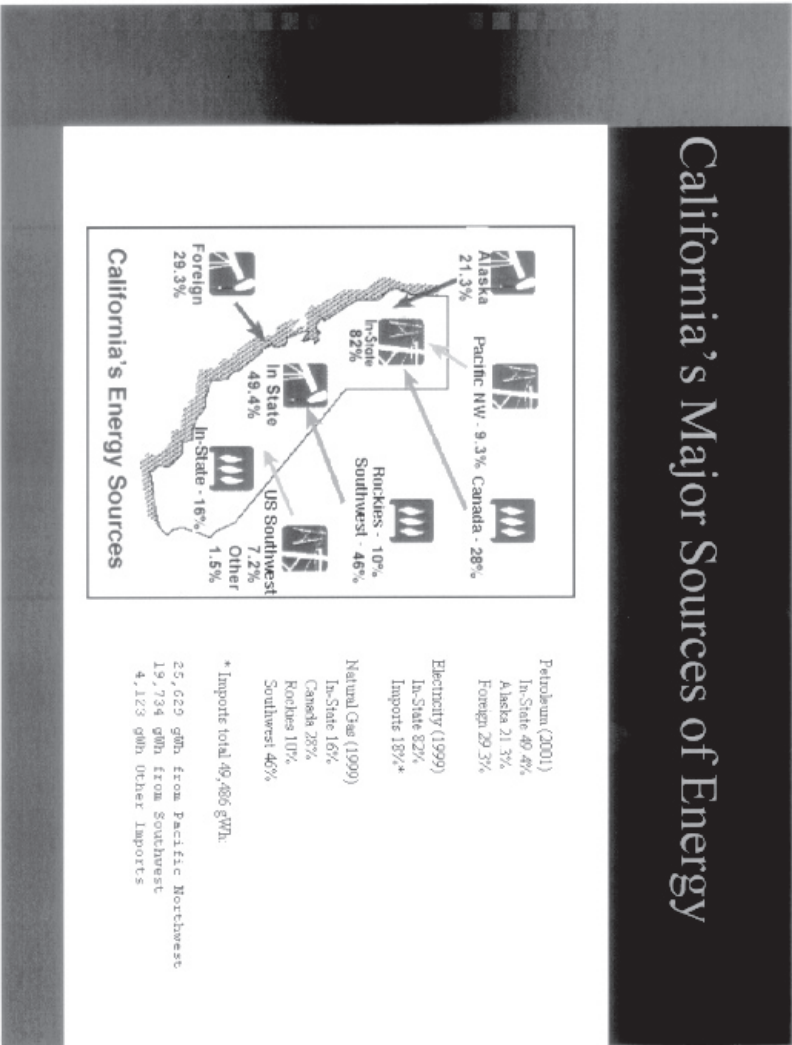
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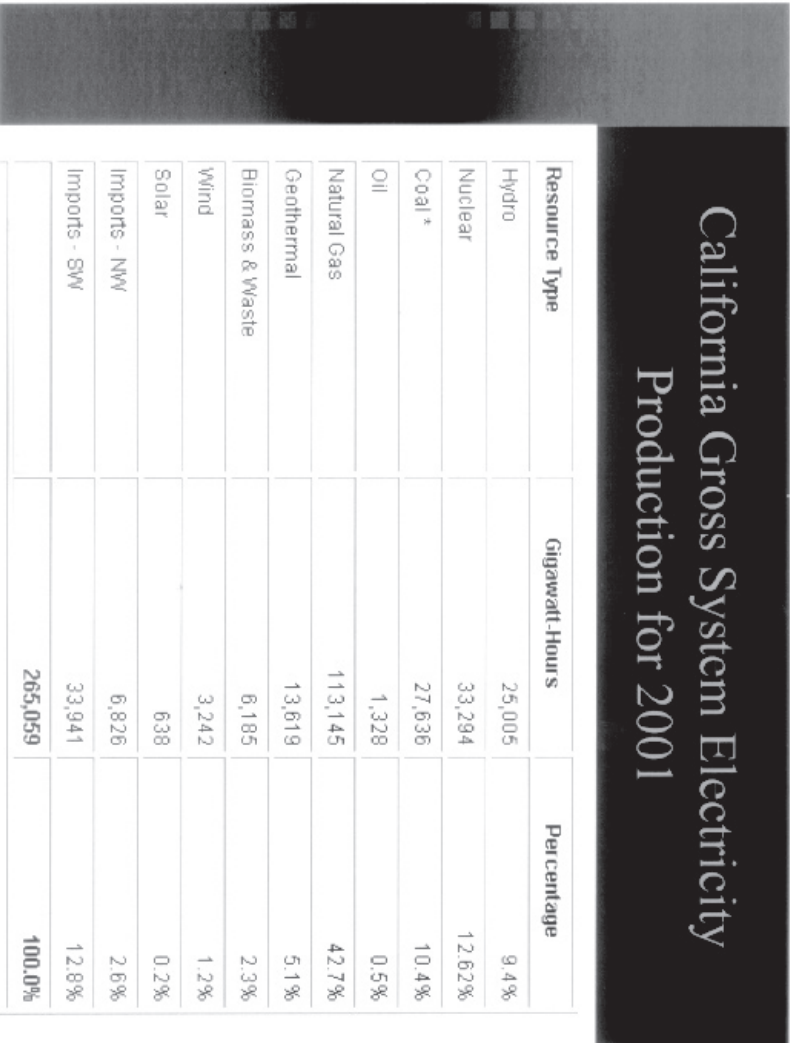




Suggested Existing Conditions
Information

- Existing Statewide Energy System
 - ◆ Major Sources of Energy
 - ◆ California Energy Production
 - ◆ San Diego Electric and Natural Gas Transmission System
- San Diego County Energy Consumption
- Local Power Plants
- Applicable Regulations





Electric Transmission System

- Transmission of electricity from power plants to the utilities is governed by the California Independent System Operator (ISO).
- Three 138 kV electric transmission lines enter San Diego County from the north at Camp Pendleton – 69, 138 and 230 kV lines continue south along the coast and one 230 kV line goes inland then south.
- One 500 kV electric transmission line enters San Diego County from the southeast near Jacumba.


Natural Gas Transmission System

- Large high-pressure gas lines enter the state from several sources including Canada and the Southwest.
- Southern California natural gas storage areas fed by these transmission lines are located in Orange and northern Los Angeles County
- From these storage facilities, high pressure gas transmission lines enter the County from the north inland area (Rainbow Area) - one that veers to the coast (30-inch) and one that continues inland (16-inch).

- San Diego County Electricity Deliveries
Year 2000
- 1,013,799 Residential Accounts consuming 6,041 Million kWh
 - 125,969 Non-Residential Accounts consuming 11,700 Million kWh
 - Total of 1,139,768 accounts consuming 17,741 Million kWh
 - Statewide, 250,310 Million kWh consumed

Estimated San Diego County Natural Gas Deliveries Year 2000

- Residential: 5,412 Million Cubic Feet
- Non-Residential: 6,087 Million Cubic Feet



Local Power Plants

- These power plants do not necessarily provide all of the electrical power to the County of San Diego (it is pooled with multiple sources by the ISO):
 - ◆ South Bay (Duke Energy): 693 MW
 - ◆ Encina (Cabrillo Power): 965 MW
 - ◆ San Onofre Nuclear Generation Station (SCE): 2,150 MW
 - ◆ Palomar Energy Power Plant, Escondido (SDG&E): 550 MW (On Line 2006)



Existing Energy Regulations

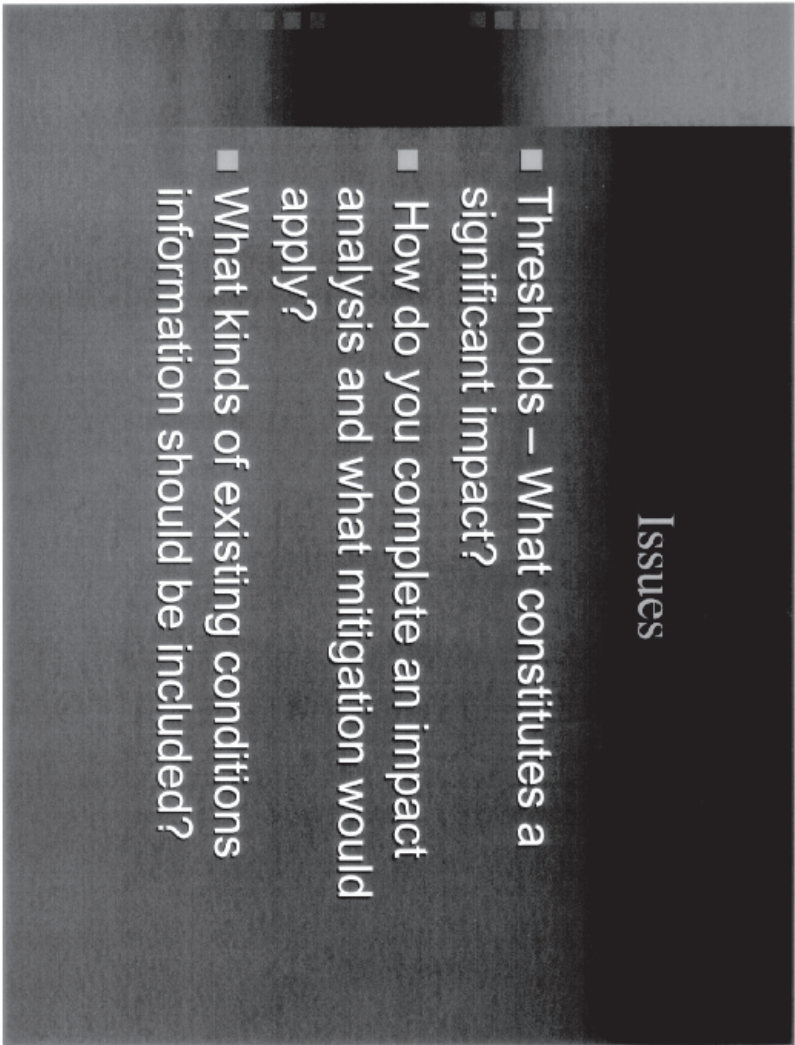
- 2001 Title 24, Part 6
California's Energy Efficiency Standards for Residential and Nonresidential Buildings
 - ◆ The Energy Efficiency Standards for Residential and Nonresidential Buildings were established in 1978 in response to a legislative mandate to reduce California's energy consumption. New standards went into effect on June 1, 2001.

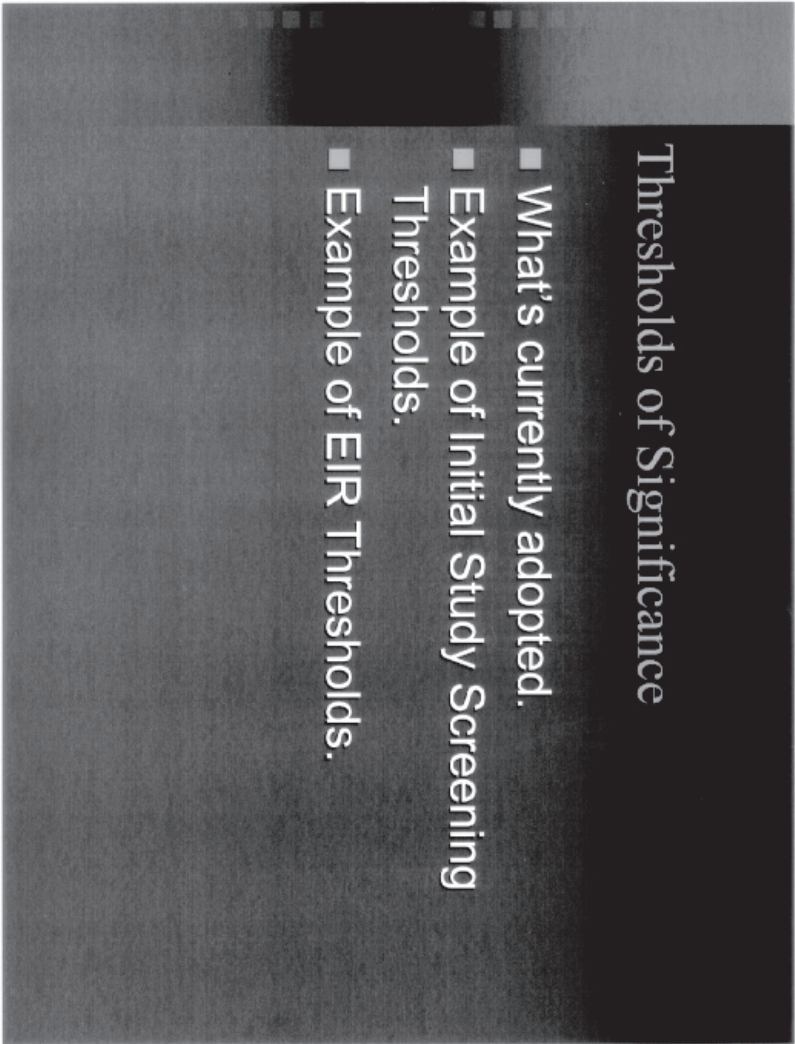
Existing Energy Regulations (cont.)

- The **Home Energy Guide** is designed specifically for residential builders to give out to new homeowners. The Guide satisfies California's Energy Efficiency Standards (Title 24, Part 6), which require that builders give new homeowners information on how to efficiently operate their new home.









Determining Significance

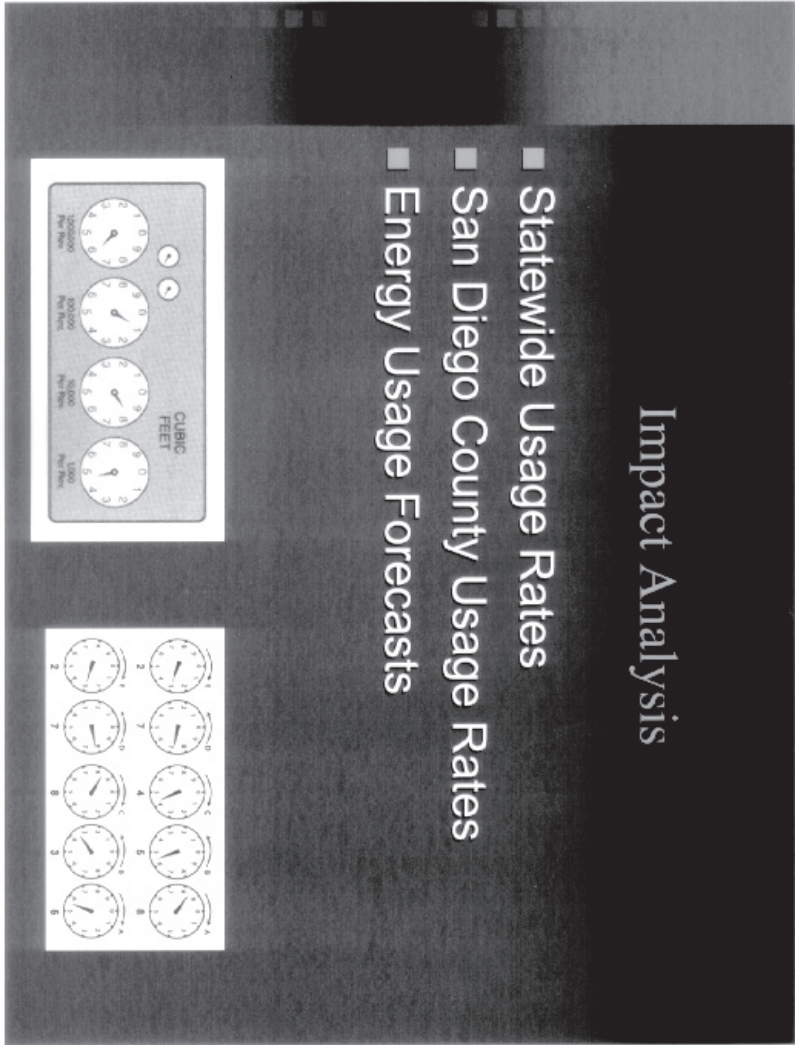
- Currently, no locally adopted thresholds:
 - ◆ Energy/Utilities are not covered under the current CEQA Checklist
 - ◆ Could use issues under old CEQA Checklist:
 - ◆ Would the project conflict with adopted energy conservation plans?
 - ◆ Would the project use non-renewable resources in a wasteful and inefficient manner?
 - ◆ Would the proposal result in a need for new systems, or substantial alterations to power or natural gas?

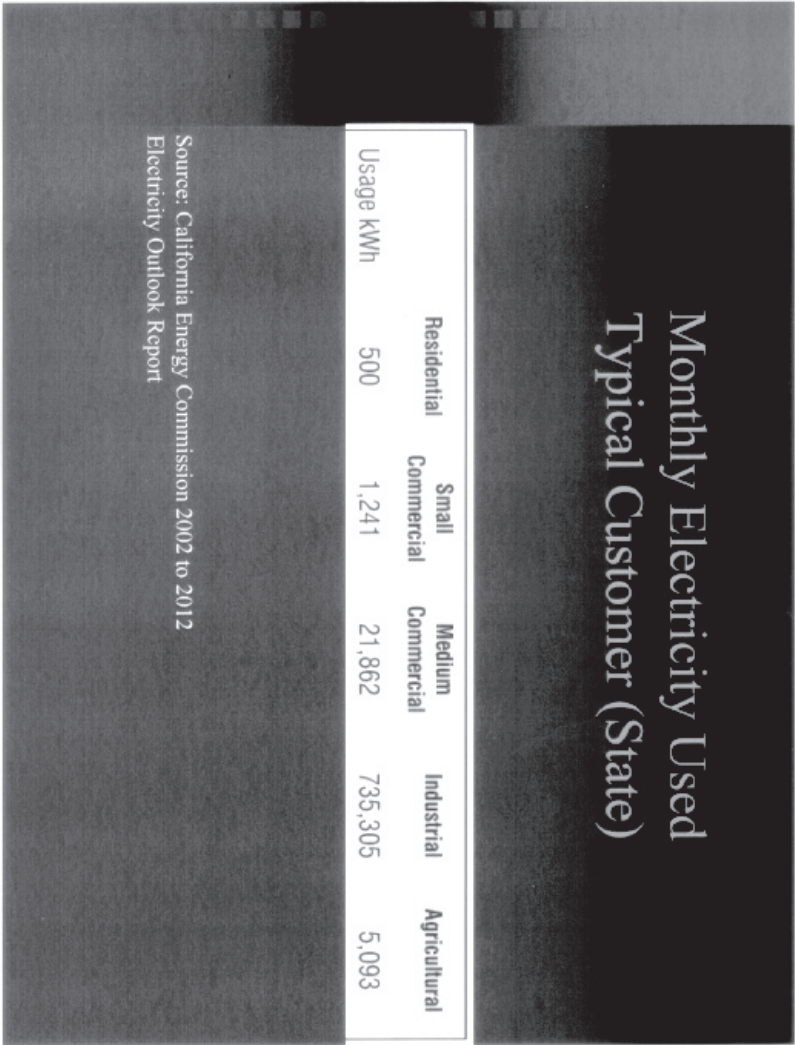
Determining Significance (cont.)

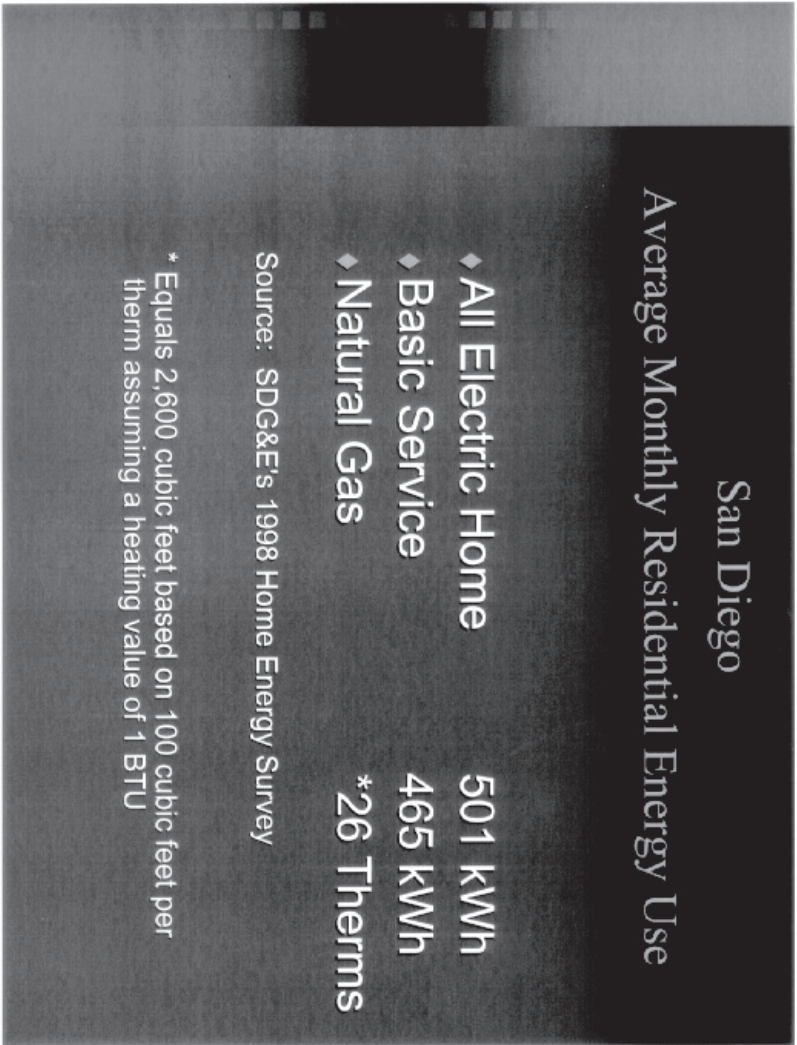
- Derived from the City of Los Angeles Draft Guidelines:
 - ◆ Initial Study Screening:
 - ◆ Would the project design or operation conflict with adopted energy conservation plans or exceed the growth in the applicable community plan?
 - ◆ Would the project result in the need for new off-site energy supply facilities, or major capacity enhancing alterations to existing facilities?

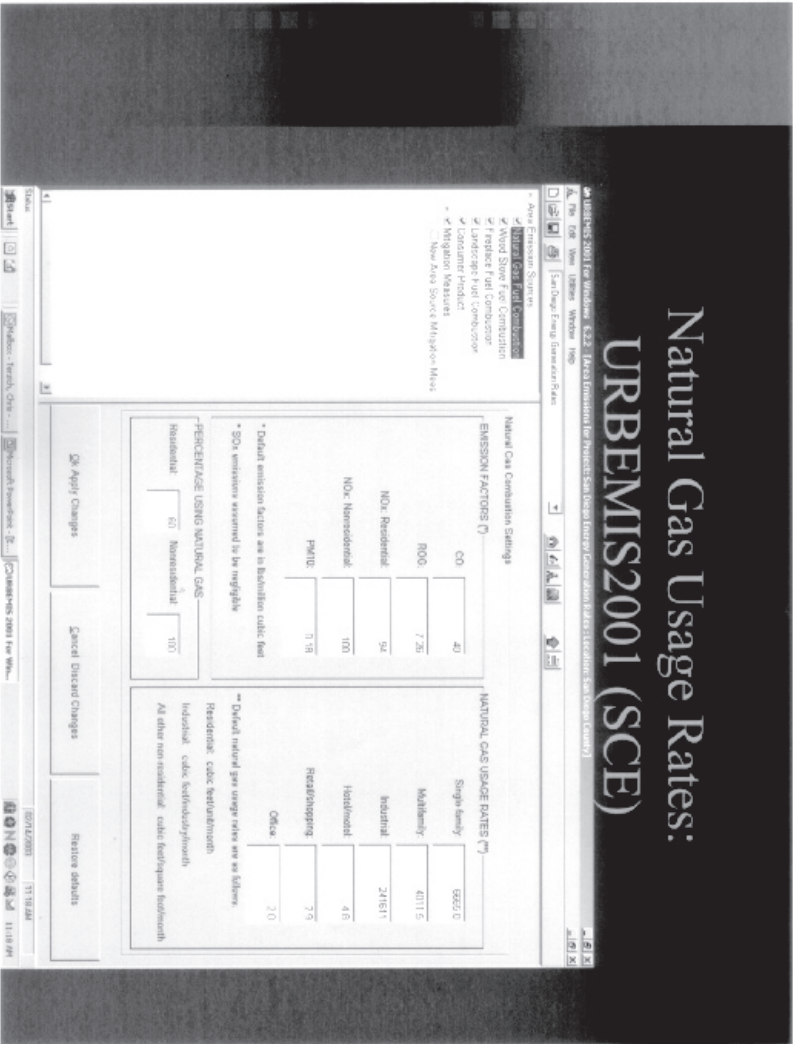
Determining Significance (cont.)

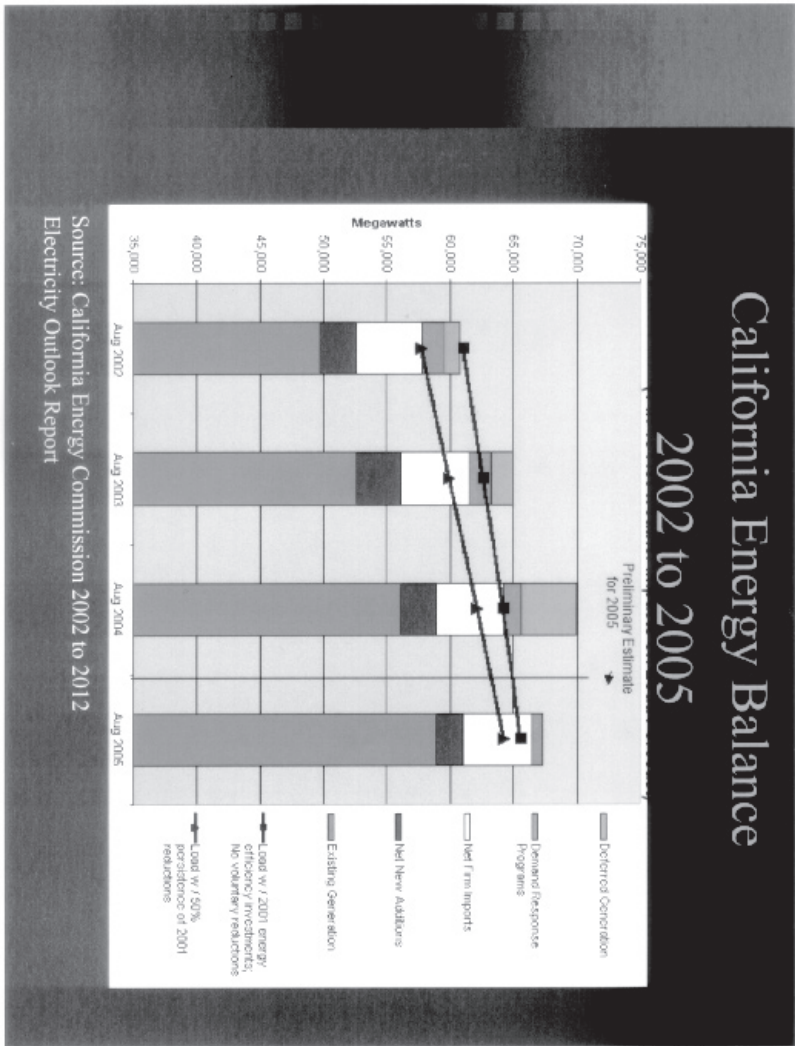
- EIR Thresholds:
 - ◆ The extent to which the project would require new off-site energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
 - ◆ The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond state or local requirements.

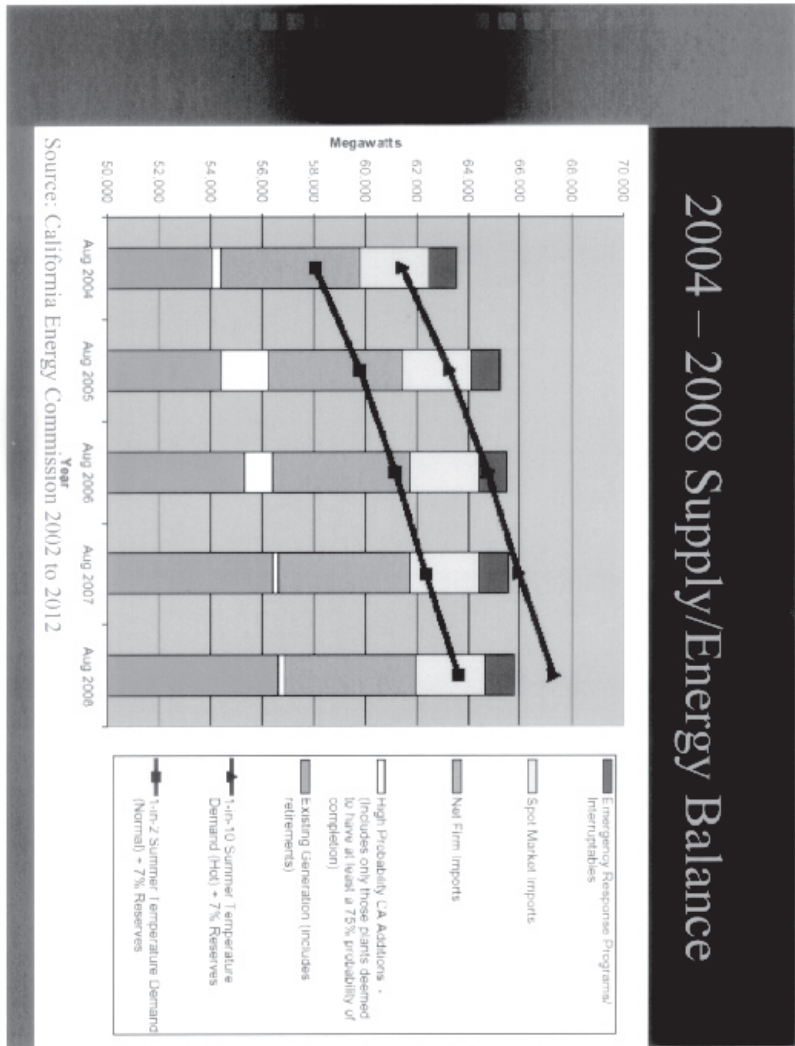


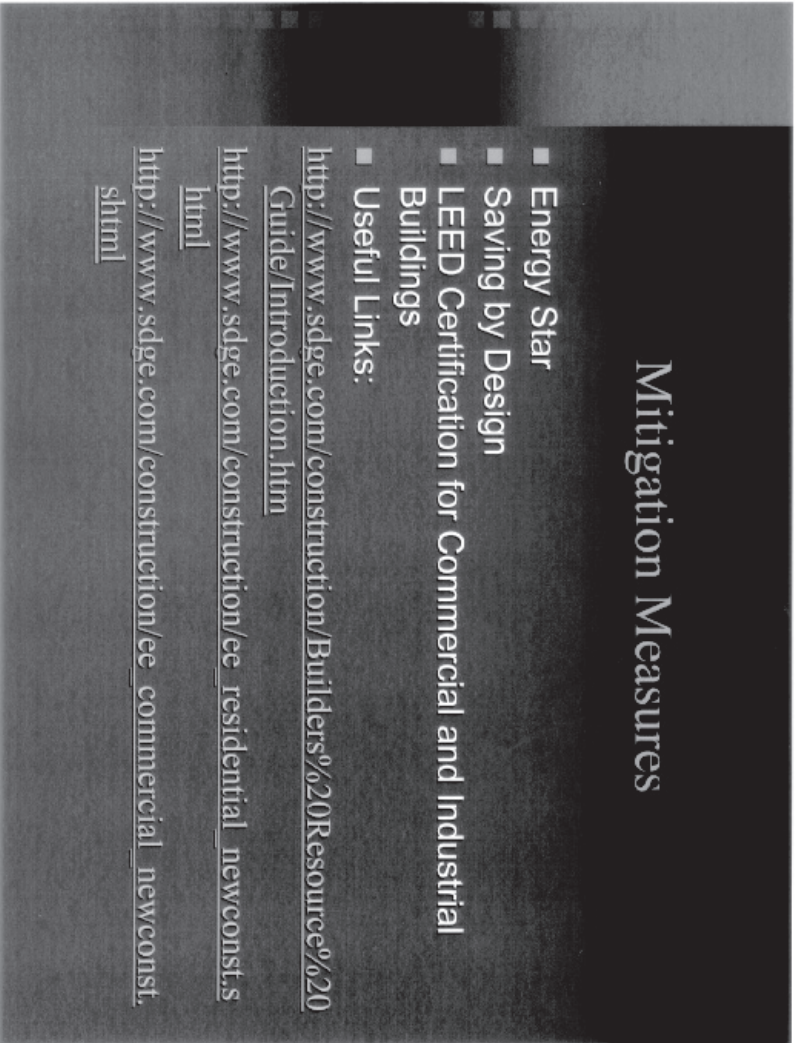












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FOR THE FIRM:
Alicen Clark Wong
e-mail: Alicen.Wong@greshamsavage.com

550 EAST HOSPITALITY LANE, SUITE 300
SAN BERNARDINO, CALIFORNIA 92408-4205
(909) 884-2171 • FACSIMILE (909) 888-2120
www.greshamsavage.com

September 12, 2005

VIA FACSIMILE 619.236.9148
AND U.S. MAIL

Ms. Alexandra Elias
Centre City Development Corporation (CCDC)
225 Broadway, Suite 1100
San Diego, CA 92101

Centre City Development Corporation
SEP 14 2005
CLW:lw

Re: Draft Environmental Impact Report ("DEIR") for San Diego Downtown
Community Plan (the "Project"), CCDC Ordinance and Redevelopment Plan

Dear Ms. Elias:

Our firm represents the BNSF Railway Company, ("BNSF"), the owner and operator of the railway facilities on California Street and on Harbor Drive in the Project area. BNSF is concerned about the large number of high-rise residential projects, including those proposed by the Community Plan, which will be developed adjacent to the railway corridor. We have reviewed the DEIR and provide the following comments and suggestions:

1. Acoustical Study

14.1 The acoustical study failed to measure ambient noise adjacent to the railway tracks and did not analyze the potential railway noise impacts (including horn noise) at night. In addition, Figure 5.7-2 failed to include noise on California Street on the Noise Contours Map. Yet the DEIR concludes that the "[a]verage hourly noise levels generated by railroad activity along California Street and Harbor Drive do not exceed 65 dB(A) CNEL". The DEIR fails to provide factual support for this conclusion.

14.2 Mitigation Measure LU-B.4-1 incorrectly assumes that railway noise impacts (from engines, wheels, and horns) need only be mitigated in sleeping rooms. The measure must be expanded to include common areas and balconies, where railway noise must also be mitigated.
14.3 We suggest LU b.4-1 be revised to require all residential developments in the Project area to mitigate interior noise to 45 dBA, and exterior noise in the Project's common areas to 65 dBA.

The DEIR also (i) identifies noise from train horns and crossing bells as 95 dB(A) at 50 feet from the source; and, concludes that noise could intrude in residences as far as 1,000 feet away from the railway tracks in areas where there are no obstructions; and (ii) concludes that

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VICTORVILLE OFFICE • 13921 PARK AVENUE, SUITE 208, VICTORVILLE, CA 92392 • (760) 243-2889 • FACSIMILE (760) 243-0467

A378-005 - 42092.1

14.1 Train noise depends upon a number of factors. Frequency of activity, types of trains (freight, Amtrak, Coaster), track conditions, travel speed, and use of train horns. Trains moving along the Harbor Drive/California Street corridor are slow moving, and are dominated by Amtrak or Coaster during the day, and several freight trains mainly at night. Future track utilization is forecast to slowly grow. In response to this comment, the hourly noise exposure at 50 feet from the track centerline was calculated using the FTA Manual (1995) for three trains, six locomotives, and a 15 mph travel speed. Without including horn noise, the noise level at 50 feet from the tracks was estimated at 59 dB Leq (one-hour average). When train horns are included, the level at a distance of 50 feet was estimated to be 65 dB Leq. Due to the influence of trains during the evening hours, the Leq level is considered representative of the CNEL value. Thus, train noise would exceed 65 CNEL.

Unlike traffic noise, train noise would be intermittent and only exceed 65 CNEL when horns are in use which would occur as a train approaches a road crossing. As a consequence, the EIR considers train noise to constitute a land use rather than health and safety issue.

COMMENTS

RESPONSES

- 14.2 This comment is correct. LU-B.4-1 has been revised in the FEIR to require 45 dB Leq within all habitable rooms. However, balconies are not required under Title 24 to be maintained at 45 dB Leq or less.

- 14.3 As discussed above, the mitigation measure has been revised to require interior noise levels in habitable rooms to not exceed 45 dBA Leq. However, no mandatory requirement will be included for exterior areas. State law does not mandate outdoor noise limits. The City's General Plan does require adequate outdoor recreation areas to be provided where noise levels would not exceed 65 dB CNEL. However, balconies need not be protected if sufficient common recreation area is provided which would not exceed 65 dBA CNEL. Thus, noise attenuation for outdoor recreation areas would be determined by the City as individual projects are proposed along the railroad tracks.

GRESHAM SAVAGE NOLAN & TILDEN,
A PROFESSIONAL CORPORATION
Alicen Clark Wong

Mayor and Members of the City Council
Chair and Members of the Redevelopment Agency
September 12, 2005
Page 2

diesel train engines may produce short-term noise of 85 dB(A) while maneuvering, but the duration is too short to create a measurable noise constraint. Although these noises may last only for a short duration on the CNEL scale, its the maximum noise level of the horn or the crossing bell that will be audible to residents who live on a railway track. Therefore, we ask that CCDC require proponents of residential projects adjacent or across from railway tracks ("Project(s) Proximate to the Railway") to disclose the noise to potential buyers.

2. Disclosures Prior to Sale

Many of the 41,000 additional residents who will live in the Project area will reside adjacent to the railway tracks and freight trains usually travel in the early morning, when residents are asleep. Therefore, the following proposed conditions of approval will ensure that potential buyers consider railway noise impacts prior to purchasing a unit next to the tracks.

(i) **CC&Rs:** To ensure adequate disclosure throughout the Project area, we ask CCDC to require every Project Proximate to the Railway to record private Covenants, Conditions and Restrictions ("CC&Rs"), including the following language in bold type on page 1:

Notice of Disclosure

Each Owner's interest is subject to the fact that BNSF Railway Company operates trains 24 hours every day on the railway tracks on California Street and on Harbor Drive and in the switching yard at Eighth and Imperial Avenues. By accepting the conveyance of an interest in the [insert name of project here] (the "Project"), each Owner accepts all noise, vibration, fumes, and particulate matter (dust) generated by trains, as well as the fact that the railway may block sunlight.

(ii) **Certificate of Occupancy:** Upon issuance of the Certificate of Occupancy for each phase or development of a Project Proximate to the Railway, and prior to offering the first unit for sale or lease, the project proponent shall post a copy of the Notice of Disclosure in a visible location in every unit, and include a copy of the Notice in all informational materials distributed to potential purchasers.

(iii) **Public Report:** Every tract map recorded for a Project Proximate to the Railway shall be required to include the following Notice as a condition of map approval, and the condition shall be included in the Public Report (commonly referred to as the "white report").

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A178-000 - 42992.1

14.4

14.4 The purpose of real estate transaction disclosures is to reveal the condition of a property before transfer of title takes place. This is primarily to ensure an informed decision as to the acquisition of the interest in real property.

The purpose of a mitigation measure in an EIR, by contrast, is to avoid, minimize, rectify, reduce or compensate for an *environmental* impact identified in the EIR (CEQA Guidelines, Section 15370). The mere disclosure of the existence of railroad noise does not avoid, minimize, rectify, reduce or compensate for the noise produced by the railroad activities.

As a policy matter, the decisionmaker may decide to enact an ordinance requiring the type of disclosure sought by the commenter; however, such a requirement is not a mitigation measure, and is not appropriately enforced by inclusion in the EIR.

GRESHAM SAVAGE NOLAN & TILDEN,
 A PROFESSIONAL CORPORATION
 Alicen Clark Wong

September 12, 2005
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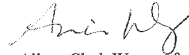
14.4
 Cont.

Each Owner by accepting a conveyance in Tract No. [insert tract map no. here], takes title to the land subject to the railway operations adjacent to Harbor Drive and in the switching yard, immediately adjacent to the Project. These railway operations include trains operated by BNSF Railway ("BNSF") and other railway carriers. Each Owner is hereby notified that BNSF operates 24 hours per day, and that railway operations may result in the following conditions in each residential unit, and in the common areas: noise, vibration, particulates (dust), may block sunlight.

14.5 [] We ask that CCDC require the DEIR to identify railway noise and mitigate it appropriately. Also, that each Project Proximate to the Railway comply with the above-referenced conditions to ensure adequate disclosure of railway noise.

14.6 []

Very truly yours,


 Alicen Clark Wong, of
 GRESHAM SAVAGE
 NOLAN & TILDEN,
 A Professional Corporation

cc: Mark A. Ostoich
 Bob Brenda

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14.5 Based on the previous responses, the DEIR adequately addressed train noise.

14.6 As indicated in response to comment 12.4, CCDC does not intend to require real estate sales disclosure of train noise or any other noise source.



3727 CAMINO DEL RIO SOUTH, SUITE 100
SAN DIEGO, CA 92108
PHONE: 619-584-5744 | FAX: 619-584-5748
WWW.DELRIODOWNTOWNCENTERFORCPI.ORG

(by fax)

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 13 2005

Orig. To: 9:27A.M.

Copy To:

FROM: Murtaza H. Baxamusa, AICP
TO: Alexander Elias, Centre City Development Corporation (CCDC)
SUBJECT: Draft Environmental Impact Report for the Proposed Downtown Community Plan
DATE: September 12, 2005.

CPI appreciates the opportunity to review the Draft EIR and to participate in the Steering Committee of the Downtown Community Plan Update.

We are concerned that this EIR will be used to eliminate public input from the environmental impacts of future development projects approved by CCDC for the next five years. Listed below are some of our concerns on the document.

TRAFFIC AND CIRCULATION: NO MITIGATIONS IMPLEMENTED

In response to potential traffic impact on streets, Mitigation Measure TRF-A.1-1 says that there will be a study conducted after five years. However the intent of CEQA is to incorporate mitigation measures into project approvals, and not to approve projects unless the mitigation has been implemented. California Public Resources Code Section 21081(a)(1) states that projects cannot be approved unless "changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment". Studying impacts is not mitigation. Worst still, studying post-project impacts is not mitigation, and does not ensure a sincere effort at pursuing feasible mitigation measures with public input.

Therefore issuance of development permits should be contingent on a public review of mitigation measures being implemented.

LAND USE: INCONSISTENCY WITH THE GENERAL PLAN

As community plans within the city are updated, their goals and policies are supposed to reflect the new village strategy (Strategic Framework EIR, IV-21). The Downtown EIR has not attempted to do a comprehensive evaluation of whether the goals and policies of the Community Plan conform to the General Plan.

For example, several components of the Downtown Community Plan could potentially conflict with the following goals of the Action Plan:

15.1

15.2

15.1 This mitigation measure follows the acknowledgement that, on a programmatic level, "the timing associated with implementation of improvements . . . is difficult to predict." This is because of the uncertainty regarding the actual realization of the projects that are assumed will create the predicted impacts. Courts have upheld mitigation measures which articulated other performance standards, identified possible component parts of a future mitigation measure, and committed the agency to: (1) a study which would determine which of the components, if any, would actually mitigate the identified impact, and (2) implement the measures the study identified as proper mitigation. Even though the EIR concludes that the impact would be significant and not mitigated, CCDC has committed in Mitigation Measure TRF-A.1-1, to the regular review of the grid system's capacity, and to "incorporate needed roadway improvements" as needed, as disclosed by this regular monitoring. CCDC is therefore committing to a meaningful program of mitigation at this level.

15.2 A discussion of the relationship of the proposed Community Plan to the General Plan is provided on page 5.1-14 of the EIR.

15.3 *Goal 7: Promote Economic Prosperity*

- Establishment of economic development policies to promote high quality employment opportunities; (7a)
- Achieve a higher standard of living for all San Diegans; (Core Value in Goal 7)
- Consider wage levels of jobs created; (7f)
- Prepare economic impact assessments for selected projects. (7f)

15.4 *Goal 8: Promote Equitable Development*

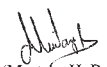
- Analyze and anticipate the dynamics of gentrification in individual communities; (8a)
- In adopted redevelopment areas, secure public ownership of real estate to provide opportunities for affordable housing and office space for neighborhood residents and service providers; (8a)
- Encourage non-profit group resident education programs focusing on residents' legal rights, home-buying and selling strategies, and skills in negotiating for equitable development in the midst of gentrification. (8a)

15.5 Therefore there should be acknowledgement of these goals and policies in the Community Plan, and a demonstration by the Agency that the certification of the documents does not conflict with any of these goals and policies.

15.6 HOUSING: IMPACTS NOT EVALUATED
 The EIR states that affordable housing issues are not required to be addressed in an EIR. However, CEQA Guidelines Section 15131 make it clear that economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Increasing base FARs is a physical change that will impact the supply of affordable housing by making it infeasible for low-income population to live downtown.

In Section 21083(c), CEQA requires an agency to determine that a project may have a significant effect on the environment if it will cause substantial adverse effects on human beings, either directly or indirectly. This section was added to CEQA by the same bill in 1972 (AB 889, Chapter 1154 of the Statutes of 1972) that added the definition of the term "environment" and the term "project". The statement "there are no issues related to affordability that would translate into unique physical changes in the environment" (page 1-4) is inaccurate when you know that affordability is intricately linked to land entitlements, zoning, FAR, design guidelines, parking requirements and surrounding land-uses.

15.7 GROWTH INDUCING IMPACTS
 There should have been a study of the gentrification of surrounding neighborhoods as a result of downtown growth. Anticipated impacts include increased traffic congestion, rising property values, parking crises and turnover of property to real estate investors. This EIR is incomplete in that respect.


 (Murtaza H. Baxamusa)

15.3 Economic issues are not required to be evaluated in an EIR. As stated in CEQA Guidelines Section 15131(a), economic or social effects of a project shall not be treated as significant effects on the environment. "While an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect."

15.4 The equitable nature of development is considered a social issue which, as indicated in response to comment 15.3, is not required to be evaluated in an EIR.

15.5 See responses to comments 15.3 and 4.

15.6 The commenter seeks to have CCDC and the Agency characterize the status of affordable housing as a proper subject for CEQA review. However, under Section 21060.5 of the Public Resources Code, the "environment" with which CEQA is concerned is the physical conditions within an area. Furthermore, as indicated in response to comment 15.4, an EIR is not required to address social or economic issues. Thus, the effects on affordable housing are social and economic effects and, therefore, not subject to CEQA.

15.7 The EIR does study the potential physical effects of the project upon the surrounding neighborhoods. However, the "rising property values" and the identity of the future property owners is a social or economic impact not subject to CEQA analysis. On the other hand, traffic and parking impacts are studied in Section 6.2.6 of the EIR.



Citizens Coordinate for Century 3

5252 Balboa Ave., # 207, San Diego, CA 92117-7005 619.232.7196

CENTRE CITY DEVELOPMENT CORPORATION

SEP 12 2005

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September 12, 2005

Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

RE: Comments regarding the Draft Environmental Impact Report for the San Diego Downtown Community Plan

Thank you for this opportunity to comment on the Draft Environmental Impact Report (EIR). We look forward to the opportunity to comment on the Downtown Community Plan update and the Centre City Planned District Ordinance once the public hearings have been scheduled.

San Diego's Citizens Coordinate for Century 3 (C-3) was established in 1961 as a land-use advocacy organization with a mission to address the highest standards of environmental quality in both the built and natural environment, which includes physical design, historical preservation, economic benefit and social progress as set forth in "Toward Permanent Paradise." C-3 has closely followed the re-development of downtown since CCDC's creation in 1975. We have reviewed the EIR and have the following concerns.

1) As recently as five years ago, the total build-out population of the Downtown Plan Area was projected to be 50,000 by the year 2025. The current population projection is 90,000. Office development is projected to increase by almost 10 million square feet. C-3 is not against such intensification of downtown, but we feel strongly that it is essential that all impacts are measured, and necessary mitigation measures are identified. We are concerned that given the nature of downtown, certain mitigation measures will be unfeasible or counter-productive. For example, according to the EIR, increased traffic will lead to "unacceptable levels of service on specific roadway intersections and/or segments within downtown." The likely mitigation measure will be the widening of the roadways which in the context of downtown will necessitate the narrowing of sidewalks, the elimination of parallel parking that provides a buffer from moving vehicles for pedestrians and, at the intersections, a longer distance for pedestrians to cross. These measures are the very opposite of what new-urbanist principles call for to improve the pedestrian experience. Without mitigation, stalled traffic will lead to more air pollution and noise, worsening the pedestrian experience. We are stressing this point because the plan maintains that the increase in densities will enrich the pedestrian. This is a basic contradiction that needs to be addressed.

2) Freeway access in and out of the Downtown Plan Area associated with future downtown development will result in unacceptable delays, but this is dismissed as not being the responsibility of CCDC or future developers. This should be addressed in the EIR.

3) The 36,000 parking-space deficit causes great concern. Currently there is a 2,000 space deficit and that has required considerable remedial measures such as the Downtown Parking Management Group, the Downtown Community Parking District, the Parking Advisory Board, the Shuttle Task Force, the District 2 Parking, Transportation and Connectivity Summit, etc.

4) The proposed mitigation measures for the transportation impacts mentioned above are studied at 5-year intervals. "At five year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall conduct a downtown-wide evaluation of the ability of the grid system to accommodate traffic within downtown..."(Table 1.3.1). After plan approval? First we approve the plan and then determine if it works? Such a statement is symptomatic

16.1

16.2

16.3

16.4

16.1 The EIR identifies the potential for conflict between the pedestrian goals and policies of the Draft Community Plan and the intersection improvements potentially required to maintain satisfactory traffic flow. Mitigation Measure TRF-A.1-1 specifically requires CCDC to review the effect of proposed improvements on pedestrian and bicycle activities whenever specified conditions could occur.

16.2 Freeway impacts are identified and discussed, but it is also true that the identified mitigation measures are not within the power of CCDC or future developers to implement. The California Department of Transportation must agree to and authorize any improvements to freeways or freeway access ramps.

16.3 The Draft EIR acknowledges the potential for significant shortfalls. However, as noted in the EIR, the actual parking supply would likely be greater than assumed in the EIR due to the private market taking advantage of opportunities for parking garages.

16.4 This mitigation measure follows the acknowledgement that, on a programmatic level, "the timing associated with implementation of improvements . . . is difficult to predict." This is because of the uncertainty regarding the actual realization of the projects that are assumed will create the predicted impacts. Courts have upheld mitigation measures which articulated other performance standards, identified possible component

COMMENTS

RESPONSES

parts of a future mitigation measure, and committed the agency to: (1) a study which would determine which of the components, if any, would actually mitigate the identified impact, and (2) implement the measures the study identified as proper mitigation. By committing in Mitigation Measure TRF-A.1-1, to the regular review of the grid system's capacity, and to "incorporate needed roadway improvements" as needed, as disclosed by this regular monitoring, CCDC is committing to a meaningful program of mitigation. See response to comment 15.1.

September 12, 2005
 Centre City Development Corporation
 Page 2

16.4
 Cont.

of a document, the purpose of which seems to be justifying the plan as proposed rather than measuring its potential impacts.

16.5

5) The preceding statement is especially true of public services and housing. The EIR goes to great lengths not to evaluate these impacts, because it is said to be "outside the scope of CEQA." For example, there is no reference in the EIR to the required number of parks that the proposed population of 90,000 demands. There are vague references to so-called "allowed" and "required" acres in the Downtown Community Plan Update, but no such references appear in the PDO or the EIR. The population impact will be mitigated by the necessary number of parks (e.g., livability goals), and this needs to be in the EIR.

16.6

6) The EIR claims that the financial climate (e.g., the impact of downtown real estate speculation on surrounding neighborhoods) is not part of the environment. However, the proposed increase of base maximum and minimum FAR's in the redevelopment project area has caused massive real estate speculation causing land prices to jump from \$300 per sq. ft. in 2004 to over \$500 per sq. ft. in 2005. This has already caused disruptions and negative effects to the quality of life and livability not only for those living in downtown, but also in surrounding neighborhoods. As the next 25 years unfold and buildout is approached, there is considerable reason to worry that the financial climate will be a maelstrom for those who make less than 300% AMI and believed they could live in and around downtown.

The percentage of low and moderate-income housing will decrease dramatically given current development trends. While CEQA does not require consideration of socio-economic issues, providing housing for employees near their employment has obvious environmental benefits. This extremely narrow interpretation of CEQA mandates could be counterproductive. How are we to decide whether the proposed plan will not lower the quality of life presently enjoyed by the residents, workers and visitor of downtown? Uncertainty as to its effects could lead to the rejection of the community plan.

16.7

7) This EIR is a Master EIR that is being called a Program EIR. This is misleading and obfuscates the true intention of this EIR to streamline and eliminate environmental impacts of the future 25 years' of redevelopment downtown. This EIR appears designed to make it possible for developers to build projects without conducting subsequent impact reviews per project. Indeed, this EIR only requires that officials look over their shoulder in five-year increments to survey the effects of the development on a very narrow range of impacts without any required mandates to mitigate the problems they identify.

16.8

The overarching problem with this EIR is that it does not project whether the Downtown Community Plan Update and revised Planned District Ordinance are feasible. Both planning documents state very clearly their intentions to create a great city, make it livable for everyone, including providing public and cultural amenities, infrastructure, quality connectivity, equal access and ensuring diversity in all its manifestations. However, there is no guaranty that this vision will be achieved. C-3 is deeply committed to a vision of the proposed Downtown Community Plan which insures not only increased densities, but also maintains the overall quality of life of downtown.

Sincerely,

 Bruce H. Warren
 President

16.5 As indicated in response to comment 15.6 and on page 5.4-10 of the EIR, Sections 15126.2(a) and 15382 require an EIR to evaluate only the physical impacts associated with providing public services required to serve a development proposal.

Additional information relative to the General Plan goal for parkland is contained in responses to comment 7.1.

16.6 The commenter seeks to have CCDC and the Agency characterize impacts to the downtown "quality of life" as a proper environmental subject for CEQA review. As indicated in response to comment 15.6, CEQA is concerned with changes in the physical conditions within an area. The need for affordable housing and the other quality of life issues raised are not related to physical conditions of the environment. Thus, while they may properly be considered by the decisionmakers in the course of considering adoption of the Community Plan amendment and PDO, they are not appropriate subjects for the EIR to address.

16.7 CEQA Guidelines Section 15180(b) expressly provides that "[A]n EIR on a redevelopment plan shall be treated as a program EIR with no subsequent EIRs required for individual components of the redevelopment plan unless a subsequent EIR or a supplement to an EIR would be required by CEQA Guidelines] Sections 15162 or 15163." This EIR complies with that section that is specifically applicable to redevelopment plans such as the Proposed Community Plan. Further, and contrary to the commenter's assumption, there will be "subsequent impact reviews per project," but they will be conducted with an eye toward the application or non-application of Sections 15162 and 15163.

16.8 The function of an EIR is not to make the determination as to whether a particular project or plan is "feasible." Rather, an EIR is an "informational document." As such, the EIR is to be just one of many sources of information the decisionmakers will use to determine whether the Plan should be adopted.

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

401 Mile of Cars Way, Suite 310 ♦ National City, CA 91950 ♦ (619) 474-0220 ♦ FAX: (619) 474-1210
ehc@environmentalhealth.org ♦ www.environmentalhealth.org

Mr. Peter Hall, President
Center City Development Corporation
225 Broadway
San Diego, CA 92101

September 12, 2005

**Subject: Center City Development Corporation Plan Update
and Environmental Impact Report**

Dear Mr. Hall:

Environmental Health Coalition (EHC) is a community-based organization that has, for the past 25 years, dedicated its efforts to achieving environmental and social justice. We believe that all people have the right to live, play and work in a safe and healthy environment. We organize and advocate to protect public health and the environment.

A myriad of contradictory issues surface when reviewing CCDC's Community Plan Update and EIR. The Plan, in Chapter 3 Land Use And Housing states that: "Achieving the vision for downtown requires continued redevelopment with an array of uses; ensuring balanced neighborhood development; and better integration of downtown with the waterfront, Balboa Park, and surrounding communities."

In view of this statement, we would like to comment on the EIR and it's shortcomings.

Land Use And Planning:

- 17.1 **Flexible use:** The EIR has not adequately analyzed potential impacts of this land use designation for the purpose of CEQA. Furthermore it failed to address the following:
 - 17.2 1. The ARB has recently finalized its land use guidance, contained in the document, *Air Quality and Land Use Handbook: A Community Health Perspective, March, 2005*. This document calls on local land use planning processes to consider toxic impacts of siting decisions that place industrial and residential land uses in close proximity. The ARB calls for at least a 500-foot separation between freeways and sensitive receptors such as residents; and a 1,000-foot separation between industrial facilities and distribution centers. No such analysis currently exists for the proposed new development in the Flexible land use designated areas.
 - 17.3 2. The Port Commission voted on 9/1/05 to establish a 1,000-foot buffer between waterfront industries and residential development from the North Embarcadero down to the National City Marine Terminal. This would protect residents from toxic emissions and the industry from lawsuits.
 - 17.4 3. The Flexible use designation does not conform with the Barrio Logan Vision Plan (see attachment), developed by the residents of Barrio Logan.

- 17.1 As no specific issues related to the adequacy of the analysis of the Flexible Use designation is identified, no specific response can be made. However, it should be noted that the Flexible Use designation has been eliminated in the latest version of the Community Plan and replaced by the Mixed Commercial designation.
- 17.2 A discussion of the California Air Resources Board (CARB) guidelines is included on page 5.8-10 of the EIR where the setbacks identified in this comment are specifically discussed. In this discussion, the potential exists for new residential development to occur within 1,000 feet of industrial uses. This analysis would apply to residential within any proposed designation including the Mixed Commercial (formerly Flexible Use) designation identified in the comment. The discussion goes on to address the fact that a substantial health risk to future residents depends largely on long-term exposure which is indicated to require a period of 70 years of continued exposure. Thus, the impacts were not considered significant.

COMMENTS

RESPONSES

- 17.3 The action referenced on the part of the Port of San Diego consisted of a recommendation adopted during a workshop. As such, it has no regulatory authority over land outside of the Port jurisdiction. This action reflects to guidelines established by the CARB, as discussed in response to comment 17.2, and is subject to the same long-term exposure requirements to constitute a significant health hazard.
- 17.4 As the Barrio Logan Vision has not been officially adopted or recognized by the City of San Diego or any other recognized public entity, the EIR appropriately did not include it in the discussion of plan consistency. Nevertheless, it should be noted that, on page 3-12 of the Proposed Community Plan, the Mixed Commercial (formerly Flexible Use) designation would require any new industrial development to demonstrate that air quality in the vicinity would not be adversely impacted. This provision specifically references Barrio Logan in recognition of the past concerns expressed by this community. Even without this Community Plan provision, state and federal regulations governing new industrial uses would require air emissions controls.

- 17.4 Cont. The Vision Plan seeks to solve the incompatible land use that has for 30 years adversely impacted Barrio Logan residents with an increase in childhood asthma, toxic fumes, noise, unsafe conditions, among other things.
- 17.5 4. Residents of Barrio Logan, a primarily low-income community of color, consider the placing of such a use, where industry will be yet again placed next to their homes and schools, as environmental racism. (They do not want such uses in their back yards)
- 17.6 5. The Flexible use areas will allow the development of industrial uses in a potential liquefaction zone, and in the Downtown Special Earthquake Fault Zone. This poses yet a greater hazard to the residents of that area as well as those in the surrounding community of Barrio Logan.
- 17.7 6. Nowhere in the report is there a list of the businesses that will be allowed to operate in the Flexible use.
- 17.8 7. Human service facilities will be allowed in the Flexible use areas. Barrio Logan is already surrounded by a disproportionate number of human services. Additional facilities will adversely impact the community.
- 17.9 • **Industrial:** The report states that this classification permits, among other things "energy generating facilities." The community would like to have this point clarified.
- 17.10 • **Transfer of Development Rights Program:** Policy 5.3-P-1 Restrict building heights as follows: Stepping down towards the water in the North Embarcadero area.

We believe that the same consideration should be afforded towards the Barrio Logan area. Given the height limit in Barrio Logan in the areas adjacent to CCDC, we propose that the following height limits be adopted:
 1. Maximum height limit south of Commercial should be 50 feet. That would be consistent with Barrio Logan's PDO.
 2. Maximum height limit between Commercial and Imperial should be 80 feet.
- 17.11 • **Transient Activities:** Increased development, contrary to the EIR's claim, will have a significant land use impact on the surrounding community of Barrio Logan. The displaced downtown homeless population will, as they did after the completion of the Ballpark and other developments downtown, migrate to Barrio Logan's parks and vacant and underutilized lots. This will exacerbate and further lower the quality of life for Barrio Logan residents.
- 17.12 • **Affordable Housing:** CCDC's projection is to "attain an overall employment level of approximately 90,000 people". The plan should offer pro formas on income distribution of the downtown workforce as well as those of the surrounding communities in order to provide and project the number of affordable housing

- 17.5 Industrial uses are not anticipated to be a major component of the Mixed Commercial (formerly Flexible Use) designation. As indicated on page 3-12 of the Proposed Community Plan, uses within this designation are anticipated to include residential, artists' studios and live/work spaces, hotels, offices, research and development, and retail. This is further reinforced by the narrative on page 6-24 about the form of development envisioned for the Southeast portion of the East Village District which would be adjacent to Barrio Logan. As indicated in this discussion, "Southeast promises to become an eclectic mix of housing types, and the interest and intrigue that accompany diverse environments. Much of the sub-district is intended for a "fine-grain" scale of development with multiple buildings per block, and lower building intensity than in most neighborhoods." As a result, existing industrial uses would be expected to transition to the target uses in the long-term which would represent a benefit to the community of Barrio Logan over the current condition. Furthermore, as discussed above, any new industrial uses would be required to implement air emission controls and incorporate high quality building design.
- 17.6 Any new industrial uses which would be constructed in the Southeast sub-district would be required to conform to the requirements of the Uniform Building Code (UBC) related to protection against earthquake damage. Any risk associated with earthquake damage to existing industrial development would be unaffected by the Proposed Community Plan.
- 17.7 See response to comment 12.2 for uses allowed in Mixed Commercial designation.
- 17.8 Comment noted. However, social service institutions are allowed in other areas of downtown, and there is no evidence to support a substantial number of new social service facilities would occur within the Southeast sub-district of East Village. In addition, any effects (e.g. public health and sanitation issues) from these facilities are already occurring and no evidence exists to suggest that these effects would be substantially increased.
- 17.9 Energy-generating facilities would include electrical substations and power transmission lines needed to meet the needs of downtown.

- 17.10 As indicated on page 5-12 of the Proposed Community Plan, much of the area near Barrio Logan (known as the Southeast sub-district of East Village) would be placed within a “fine-grain” classification. Furthermore, the floor area ratio (FAR) allowed within the areas nearest Barrio Logan would have one of the lowest ratios downtown. Although BASE FAR in downtown could go up to 12 in some cases, the FAR for the Southeast sub-district adjacent to Barrio Logan would be 3. This FAR would not allow the tall towers referenced in this comment. Lastly, Goal 5.3-G-3 encourages buildings in the Southeast sub-district to “step down” toward surrounding neighborhoods, as reflected in the proposed FARs. In fact, the proposed FAR was reduced from a preliminary draft of the Community Plan (November 2004) from a proposed 4 FAR with a potential bonus of 2 FAR for a total of 6 FAR to a proposed 3 FAR (as currently allowed) with a proposed bonus of 1 FAR for a total of 4 FAR based on public comments.
- 17.11 The EIR concurs with the observation made by this comment. The potential for significant impacts from transient activities on Barrio Logan is identified on page 5.1-20 of the EIR.
- 17.12 As indicated in response to comment 15.6, affordable housing is not an appropriate subject for the EIR.

17.12
Cont.

needed for the incomes currently paid by downtown employers. Presently we believe that the majority of downtown workers earn no more than a living wage. A full time worker earning a living wage of \$10/hr, makes an average of \$19,000.00/yr. This puts most workers at the 30% AMI level. We believe that CCDC should be providing and projecting more units at a deeper affordability.

17.13

- **Air Quality:** The proposed Downtown Development requires a new environmental analysis of air quality impacts. The proposed project would place a large residential development where air quality impacts to residents themselves are likely to be significant. The existing environmental documents fail to even identify this issue. The increase in ground level ozone created by an increase in vehicular and construction traffic is significant and should be studied further.

17.14

- **Urban Design:** We urge CCDC to adopt strict compliance with the Green Building LEED Certification program in the development of downtown. We as a society should beautify and enhance our built environment through sustainability, conservationism and a regard to human health.

We recognize the effort that you and your staff put in producing such a document. We thank you for the opportunity to comment and participate in the review process. The community of Barrio Logan and EHC are valuable entities that would help you in transforming downtown San Diego into a vibrant and healthy community for all.

Sincerely,



Randa Baramki
Co-Director Toxic-Free Neighborhood Campaign

17.13 Potential impacts related to new development downtown is specifically addressed in the EIR. The amount of carbon monoxide (CO) expected at buildout is shown to be well below the significance threshold in Table 5.8-2 on page 5.8-8. On this same page, the potential for significant localized CO concentrations (hotspots) is specifically evaluated and determined to be not significant. The only other localized risk is associated with exposure to stationary source emissions related to industrial uses and the Tenth Avenue Marine Terminal, in particular. As discussed in response to comment 15.2, the potential for health risk is considered not significant.

17.14 The Proposed Community Plan recognizes the importance of green building practices by including a specific chapter devoted to Sustainable Development (Chapter 5.8). Furthermore, Policy 5.8-P-1 states, "Prepare and implement Green Building guidelines and/or standards appropriate to the intense San Diego Downtown context to ensure high levels of energy efficiency and reduction in life-cycle environmental impacts associated with construction and operations of buildings."

**A New Community Vision for Barrio Logan!
Support a Barrio Logan that is Safe, Healthy and Affordable for Everyone!**

The residents of Barrio Logan deserve a community that is vibrant, healthy and free of toxic pollution. The current community plan and zoning have not accomplished that. As downtown San Diego and the surrounding neighborhoods change, we need to ensure that future development in our community will benefit and be affordable to current residents. Residents en Accion Logan, (Comité REAL) a committee of the Environmental Health Coalition, drafted the following principles for future development in Barrio Logan:

Ensure Healthy Neighborhoods!

- Industrial areas must be separated from residential areas.
- New housing should not be built close to the freeway, on 28th Street or on Harbor Drive.
- Truck traffic from the Port and other major industrial facilities, must be redirected away from residential areas and be limited to designated truck routes along Harbor Drive, 28th St., 32nd St., and Civic Center Drive.
- Sound barriers, such as walls and green belts, should be built along the freeway.

Create Affordable Housing!

- New rental and for sale housing must be affordable to current residents (those making less than \$40,000 per year).
- More affordable senior housing should be constructed.

Preserve community character!

- New buildings should not exceed three stories in height.
- The existing housing stock must be protected, maintained, and rehabilitated.
- Protect and preserve Barrio Logan's culture and history; Support and enhance the artistic creativity throughout the community.
- Protect community-serving small businesses.

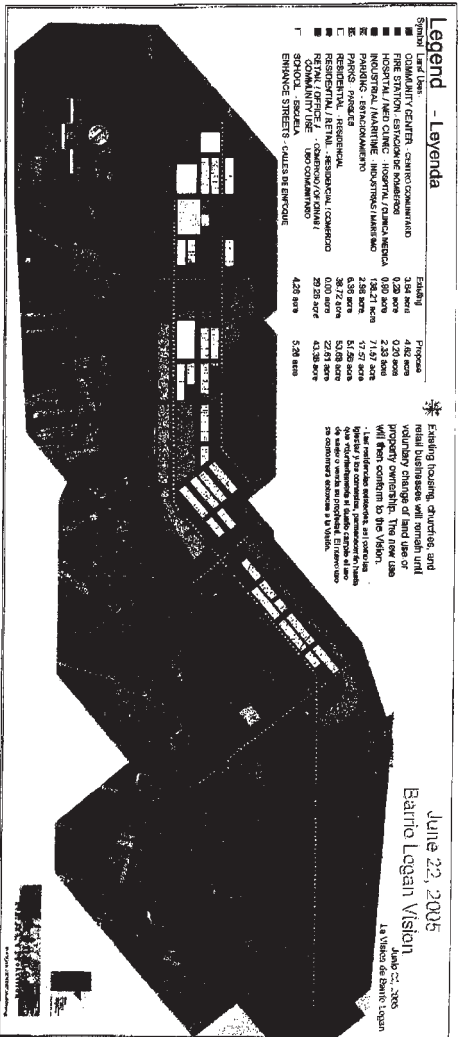
Promote a healthy community!

- New development must include more centrally located community services, more parks, and more recreational and educational centers for all age groups.
- All new development should prioritize the creation and protection of jobs with livable wages and healthcare benefits.

Yes, I/we support the Environmental Health Coalition Comité REAL Vision for my community! I/we call on the City of San Diego to complete a new community plan for Barrio Logan based upon this vision, map and principles!

Name _____ Organization _____
 Address _____ Phone _____ Email _____
 Comments _____ Date _____

Environmental Health Coalition
 401 Mid of Chen Way, Suite 310, National City, CA 91950
 Ph: (619)774-6239 Fax: (619) 474-1210
www.environmentalhealthcoalition.org
Comments@ehcna.org E-mail hdh@environmentalhealthcoalition.org



This Vision will make our community safer!
 Approximately 1,543,900 pounds of toxic or hazardous materials, liquids and solids, and 374,650 cubic feet of toxic or hazardous gases will be removed from our neighborhood!

This Vision will make our community healthier!
 Over FIVE TONS (11,000 pounds) per year of toxic air contaminants that are currently emitted near homes and schools will be moved to an industrial area. This includes over 600 POUNDS of diesel emissions, and over 100 POUNDS of heavy metals.

This Vision will make our community more affordable!
 Between 1,200 and 1,600 affordable housing units will be added to the community!

Esta Vision hará nuestra comunidad más segura!
 Aproximadamente, 1,543,900 libras de materiales tóxicos, tanto líquidos como sólidos, y 374,650 pies cúbicos de gases tóxicos serán removidos de nuestra comunidad!

Esta Vision hará nuestra comunidad más sana!
 Más de CINCO TONELADAS (11 mil libras) por año de contaminantes tóxicos del aire que actualmente se emiten cerca de casas y escuelas, serán reubicados a una zona industrial. Esto incluye más de 600 LIBRAS de emisiones de diesel, y más de 100 LIBRAS de metales pesados.

Esta Vision hará nuestra comunidad más accesible!
 Entre 1,200 y 1,600 unidades de viviendas accesibles serán añadidas a la comunidad!



September 12, 2005

Mr. Peter Hall, President
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

**Subject: Centre City Development Corporation Plan Update
and Environmental Impact Report**

Dear Mr. Hall:

The Industrial Environmental Association (IEA) is a San Diego regional public policy trade organization representing manufacturing, shipbuilding, defense, high technology, pharmaceutical, biotechnology, utility, power generation, plating, warehousing and distribution companies and solid waste/recycling operations. Recently, we have become increasingly concerned with the encroachment of residential uses in or in close proximity to industrial zones in all areas of the county.

When incompatible land uses do occur, there is the potential for tremendous economic and operational burdens on the industrial facility. Incompatible land uses in proximity to one another also burden a community, public agencies and businesses with controversy that must be managed at great expense to all concerned. This has especially been the case in the area of the working waterfront and the Barrio Logan community, and the comments in this letter also reflect the views of the Working Waterfront Group (WWG.)

It is because of these conflicts that IEA has been an active participant in several statewide initiatives to more closely examine land use incompatibilities. Our interest is based on the premise that it is far better to present incompatible land uses from occurring the first place, rather than address conflicts after the fact.

With the update of the Centre City Development Corporation (CCDC) general plan, there are areas shown as "flexible use" that would allow residential projects in close proximity to Solar Turbines at Harbor Drive and Laurel Street and to the city's major heavy industrial zone in Barrio Logan.

701 B Street • Suite 1040 • San Diego, CA 92101 • (619) 544-9684 • FAX (619) 544-9514



Page 2

Heavy industrial zones are typically characterized by their outputs/emissions, physical size, production volumes, intensity hours of operation, shipping, receiving transportation activities and outdoor storage, all of which occur in the area directly adjacent to the CCDC planning area.

Following is background information and land use guidelines that apply, and we hope will merit your further review during consideration of these areas of "flexible use" in the plan update:

Governor's Office of Planning and Research (OPR): As part of the State of California's issuance of new general plan guidelines late last year, OPR stated:

- 18.1 [] • It is important to recognize that there are certain industrial uses that will always be incompatible with residential and school uses. Residential and school uses are harmed by incompatible land uses that have environmental effects, such as noise, air emissions (including dust) and exposure to hazardous materials;
- 18.2 [] • The compatibility problem can also operate in reverse and harm a business in the form of higher mitigation costs or the curtailment of economic activities;
- 18.3 [] • Residential and school uses in proximity to industrial facilities and other uses that, even with the best available technology, will contain or produce materials that, because of their quantity, concentration or physical or chemical characteristics, pose a significant hazard to human health and safety.

California Air Quality and Land Use Handbook: The California Air Resources Board (ARB) developed the handbook to promote better, more informed decision-making by local land use agencies. Land use policies and practices, including planning, zoning and siting activities play a critical role in air quality and public health in local communities. Even with the best available control technology, some projects that are sited very close to homes can result in elevated air pollution exposures.

Recommendations from the guidebook on siting new residential land uses are:

- 18.4 [] * Distribution Centers-Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units). Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit ports.

18.1 The Proposed Community Plan recognizes the importance of promoting industrial development that would be compatible with the mixed use goal for downtown including residential uses. In describing the uses allowed in the Mixed Commercial (formerly Flexible Use) designation, the Proposed Community Plan directs any future industrial or service uses to demonstrate that air quality in surrounding residential areas and neighborhoods not be adversely affected. Furthermore, adherence to local, state and federal regulations related to the use and storage of hazardous wastes would reduce potential impacts to surrounding areas.

18.2 Comment noted.

18.3 As indicated in response to comment 16.1, hazardous materials regulations would reduce potential exposure risks.

18.4 As indicated in response to comment 17.2, a significant health risk to future residents from the Tenth Avenue Marine Terminal or other localized industrial activities within or adjacent to the downtown area would not occur.

COMMENTS

RESPONSES

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18.5 [] * Rail Yards-Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard; within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

18.6 [] * Ports-Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones.

18.7 [] **SANDAG Sourcepoint Research:** In researching incompatibilities as part of the Otay Mesa plan update, SANDAG's Sourcepoint found that a generic buffering standard between heavy industrial uses and residential is 1,000-2,000 feet.

Governor's Goods Movement Initiative: The CCDC planning area is directly adjacent to port-related activities. In January of 2005, the Governor initiated a Goods Movement Initiative to look at the growth of the state's economy at the ports, the effects on neighboring communities and the environmental impacts generated from port, rail and transportation operations. Many of the problems and concerns with the efficient safe and growing volume of delivery of goods from ports have stemmed from inappropriate land use decisions that allowed encroachment on operations, congestion in transportation corridors, increase in emissions because of circuitous routing or bottlenecks of vehicles, loss of mitigation lands such as for staging areas, etc.

Goods movement infrastructure at the port must be considered as one integrated, multi-modal system. San Diego has growing importance in the global supply chain and can benefit from the congestion and overflow that is occurring at the ports of Long Beach and Los Angeles. The Goods Movement report finds that both truck and rail access and free-flowing corridors to ports are the means to move goods more efficiently. Growth in goods movement sources also increases traffic congestion, noise, light source and emission effects. This growth in the goods movement system will in turn increase the potential for concerns in communities impacted by this growth, with an important factor being the proximity of that community to goods movement activity.

18.8 [] **Recommendation:** Extensive efforts have gone into the identification of problems associated with collocation of industrial and residential uses as detailed above. We strongly urge CCDC to consider these guidelines and exclude residential uses from the "flexible use" category in the plan update.

With regard to the accompanying Environmental Impact Report, we have the following comments:

18.5 As with the Tenth Avenue Marine Terminal operations, the health risk associated with future residential development within 1,000 feet of the railroad switching yards would not result in sufficient long-term exposure levels to constitute a significant health risk.

18.6 As indicated in response to comment 17.2, a significant health risk to future residents from the Tenth Avenue Marine Terminal or other localize industrial activities within or adjacent to the downtown area would not occur.

18.7 Comment noted.

18.8 As no significant health hazard would be associated with the Tenth Avenue Marine Terminal or railroad switching yard, CCDC does not consider it necessary to eliminate residential uses from the Mixed Commercial (formerly Flexible Use) designation.

COMMENTS

RESPONSES

Page 4

- 18.9 ***Air Quality:** The Statement on page 2 of the Air Quality Analysis that reads “smart growth that mixes residential, commercial and employment uses in higher density nodes with available multiple transportation modes is considered an extremely positive air quality strategy” is lacking full definition. It is very important for planning purposes that “employment uses” be distinguished from “industrial uses.” While co-locating residential with typical commercial or office uses would be compatible and positive, the same generalization is not applicable to industrial operations.
- 18.10 Unlike commercial or office uses, it is important to note that the formula for health risk assessments for residential impacts are calculated on the basis of exposure for 24 hours a day, 7 days a week, 365 days a year for 70 years.
- 18.11 Page 24 of the Air Quality Analysis states that the San Diego Air Pollution Control District advocates the incorporation of residential uses in existing employment areas. Once again, there needs to be a clear distinction between an employment site and an industrial site.
- 18.12 ***Noise:** Residential development in too close proximity to railroad and some industrial operations creates incompatible exterior noise levels. The maximum exterior noise level for outdoor areas in connection with residential developments is 65 dBA CNEL and is very difficult to mitigate.
- 18.13 ***Health & Safety:** The industrial/military complex beginning at the 10th Avenue Marine Terminal is within the area of influence of the CCDC plan. Industrial users routinely are permitted, prepare risk management plans and security assessments based on their operation in an industrial zone. Workers in industrial areas routinely receive extensive training and are knowledgeable in emergency procedures. Introduction of residential in close proximity may cause a business to have a higher level of permitting, undertake new mitigation measures, add technology controls or experience delays in building new facilities or changing operations.
- 18.14 ***Visual Impacts/View Corridors:** In the Public Utilities Commission proceeding 01-09-012 with regard to the Park Boulevard Grade crossing, the Centre City Development Corporation stated as part of those proceedings “that a grade separation structure would divide the downtown, as well as wall off the bay from residents and visitors.” However, the kind of tall, high-density residential projects that could be developed in the flexible use areas would create even more visual impacts than a grade separation structure and create a division between the Barrio Logan community and downtown.

- 18.9 Comment noted. As stated in response to comment 15.5, industrial uses are not expected to represent a major component of the Mixed Commercial (formerly Flexible Use) designation.
- 18.10 The EIR recognizes this long-term risk definition on page 5.8-10.
- 18.11 Comment noted. The Proposed Community Plan does not advocate a substantial level of new industrial development in downtown.
- 18.12 See response to comment 14.3.
- 18.13 Consideration of the potential impact residential development may have on permitting requirements for new industrial uses is outside the scope of the EIR and is not considered an environmental issue under CEQA.
- 18.14 The reference to the visual effects of a grade separation structure at Harbor Drive was focused on the potential view obstacle it would present to Park Boulevard which is identified in the Community Plan as a view corridor. As indicated on page 5-12 of the Proposed Community Plan, much of the area near Barrio Logan (known as the Southeast sub-district of East Village) would be placed within a “fine-grain” classification. Furthermore, the floor area ratio (FAR) allowed within the areas nearest Barrio Logan would have one of the lowest ratios of downtown. Although FAR in downtown could go up to 12 in some cases, the FAR for the Southeast sub-district adjacent to Barrio Logan would be 3. This FAR would not allow the tall towers referenced in this comment. Lastly, Goal 5.3-G-3 encourages buildings in the Southeast sub-district to “step down” toward surrounding neighborhoods, as reflected in the proposed FARs.

- 18.15 [In addition, there is no reference to the visual impacts of the high-rise residential projects in the CCDC planning area that will overlook the adjacent industrial operations that include unsightly equipment, storage tanks, visible emissions, as well as having some bay views blocked by large cranes or other equipment.
- 18.16 [***Parking:** The EIR’s transportation, circulation and access study indicates that significant project-related parking impacts would occur when build-out of the proposed downtown community plan results in projected parking shortages in the downtown area and/or parking impacts on surrounding neighborhoods. Major events already create overflow parking in the surrounding neighborhood. These unmitigated significant parking impacts will adversely affect the existing residential community. The reference that the parking situation and the effect be evaluated every five years as a mitigation strategy does not address or mitigate the problem. A parking policy to work with the port to provide public parking in the waterfront/marina area, which is already congested, is not a mitigation. Due to the shift nature of the waterfront activities, transportation demand management strategies would be very difficult to implement.
- 18.17 [***Traffic:** Park Boulevard is considered a commercial truck corridor. Already, the industrial traffic and goods movement supply system are subject to levels of service that are of great concern to the surrounding neighborhoods. The build-out of the proposed downtown community plan, particularly with high-density residential projects, will further exacerbate the problems and represent cumulatively significant impacts. Designated corridors such as Park Boulevard must be preserved.
- 18.18 [***Military Readiness:** SB 1462 requires notice and consultation with the military to assess military preparedness issues. SB 926 further requires that land use elements of general plans consider the impact of new growth on military readiness activities carried out on military bases, installations and operating and training areas. The 10th Avenue Marine Terminal is used for military cargo, and the shipyards are daily engaged in the seaworthiness and readiness of military vessels. This law provides that community advocacy groups, such as IEA and WWG, can invoke a requirement that the local planning agency conduct a full readiness and operational assessment during this plan update process. With this letter, we are formally requesting such a review be conducted.

- 18.15 As adverse visual effects associated with any current industrial uses already exist, they are not considered a potentially significant impact on future residents because these residents would have a choice as to whether to accept these view elements at the time they purchase a residence. This condition is different from the potential effect of a new industrial development posing visual impacts to existing residents.
- 18.16 Due to the programmatic nature of the analysis of the Proposed Community Plan, it is not possible to quantify parking impacts which may occur within the surrounding neighborhoods. As indicated on page 5.2-43, “The extent of parking in the adjacent neighborhoods will be a function of cost and availability of parking as well as the specific uses developed in the adjacent sections of the downtown area.” Further complicating the specific quantification is the uncertainty as to the response of the developer to meeting the full parking demand of a project as well as the willingness of the public and/or private sector to provide independent parking facilities. Thus, the five-year monitoring of parking within surrounding neighborhoods is considered a reasonable mitigation. In recognition of the lack of definition and enforcement of any future actions which could be undertaken to reduce parking impacts on surrounding neighborhoods, the EIR concludes that the impact would not be mitigated to below a level of significance.
- 18.17 The discussion of traffic impacts on surrounding areas on page 5.2-30 of the EIR acknowledges that buildout of downtown under the Proposed Community Plan would have significant impacts on intersections within surrounding neighborhoods; some of which occur in Logan Heights, just northeast of Barrio Logan.
- 18.18 The issue of security is not an environmental issue under CEQA. Therefore, no response is necessary.

18.19

* **Homeland Security:** There have been substantial new security requirements with respect to marine terminals instituted since 2001. In addition, the Port of San Diego has been designated by the Federal Maritime Administration as a National Strategic Port.

Summary: In summary, we are respectfully requesting that his plan update process include a thorough and comprehensive review of the two very different planning areas which share a common boundary. In order for the industrial and ports area to reach their full potential, we feel that transition and separation of industrial and residential uses, with at least a 1,000 foot buffer is appropriate and necessary.

Thank you for your consideration of our comments.

Sincerely,



Patti Krebs
Executive Director

18.19 The issue of security is not an environmental issue under CEQA. Therefore, no response is necessary.

COMMENTS

RESPONSES

Center City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Attention:
Alexander Elias, Senior Planner
Center City Community Plan [PDF 5.6]

Enclosure: Public Comment

SEP

Comments on Downtown Community Plan

These comments are limited to transportation portions of the Plan submitted by a Marina District resident who held and practiced with a California Professional Engineering registration for over forty years in forefront of conceptualizing and implementing state-of-the-art transportation products

The American Standard Dictionary defines "PLAN" as "A scheme, program, or method worked out beforehand for the accomplishment of an objective: a plan of attack." I question that the Downtown Community Plan document should be dignified by calling it a plan. The operative word "accomplishment" is not there. It is page after page of wish-list type objectives without specific actions or schedules to accomplish objectives. It is like looking at a Pottery Barn catalog choosing items to cover a cracked and broken plaster wall, but only if other controlling forces can be persuaded to agree and the items at sometime in future appear at a fire sale auction.

Many of the items are contradictory to other items and effectively canceling to itself or one or more of the contradicting items. Other items state objectives that have little to no possibility of being implemented.

Only a few of the examples are cited here.

"Prohibit and discourage any interruption to the street grid" (7.1.P.2 /3). Another section suggests that B Street be extended through the Civic Center. But in EIR, it states that MTS is considering closing both Second Avenue and Seventh Avenue at C Street to allow 4-car Trolleys. (Page 131) Is it the proposal that streets need be extended while avenues can be blocked? The main north/south access to city is on north/south avenues.

Estimates of build-out will, after all of the proposed attempts to reduce vehicle traffic, increase parking demand by 250%. (EIR P163/7.9) It is difficult to identify locations for this growth, especially when viewing the Pedestrian Priority Zones (Fig 7-2) Reaching these parking spaces is made more difficult by pedestrian navigation between these zones when separated by major traffic "Boulevards" such as Broadway. Will "traffic signal walk times" be lengthened (7.2-P-4) thus heavily impacting vehicle flow into and out of downtown?

"Work with relevant agencies to eliminate or mitigate adverse effects of freight train traffic on adjacent pedestrians, uses, and residents. Impacts include blocked intersections and horn noise." (7.3-P-4). The heavy rail line is a primary conduit enabling a major portion of the financial contribution from our harbor. It is the only heavy rail out of San Diego County. The Plan contradicts the efforts to increase Port of San Diego traffic that will surely increase street blockage that "relevant agencies" will be unable or unlikely to change. Economics must govern.

There are multiple platitudes like " Corporate with transit agency on public programs and campaigns to increase transit use for various types of trips, work, shopping, entertainment.

etc.” (7.3-P-8) These do not make a “plan”. Wish list or policy is a more appropriate identification

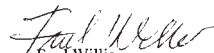
Bus Rapid Transit (BRT) has been touted in this “plan” as “a new philosophy in bus travel”.(7-9) It is not new, it was discussed in Los Angeles before the subway debacle. It is not often used as its disadvantages out way advantages. To achieve its potential, dedicated roadway must be provided. This means crossing gates and pedestrian security barriers that divide neighborhoods, and slow intersecting vehicle traffic. Traffic signal priority creates serious safety problems at high volume intersections unless exceedingly long priorities allow clearing the intersection of vehicles to lower the problem but not eliminating it. Any other system of sharing reduces the value of time gained.

“Cyclists will benefit from designated lanes and paths, throughout downtown. (7.2) How this can be accomplished on existing downtown streets is not described. Surely not replacing sidewalk space. Would the bike lanes replace a parking lane and be two-way? Would they be between parked vehicles and curb? Would they be between moving traffic and parked vehicles? (No safety there) First hand experience: I rode a bike for United Parcel’s Red arrow Messenger service in Hollywood for two years when traffic was 1939 pace. My most serious accident was a motorist opening his car door as I passed, spilling me into moving auto traffic. This element of the plan needs a lot of definition or it cannot be called a “plan”

The examples here are only representative of the contradictions, impossible dreams and an abundance of platitudes that do not constitute a plan.

With over 150 pages in the Transportation section, there is no proposed effort to attack the traffic directly with a comprehensive high speed commuter system that will attract riders with speed, safety and frequency. The systems of elevated monorails are popular in Pacific Rim countries to solve transit problems made difficult by already dense build-out of residential and business structures. The air above pedestrians, autos, buses, trolleys and trains is real estate cost free and is positively cost competitive to operate against trolleys, especially in the San Diego topography of terrain change. It has flexible scheduling and has load accommodation operations on 3-minute schedules without the costs or schedule complexities of drivers. The system is handicapped rider friendly with platform level loading, and provides added safety of an elevated waiting area requiring ticket holder access.

The writer has a website addressing a “plan” for San Diego using this twenty first century technology. <http://www.sdmonorail.com>


Fred Willis
645 Front St. Unit612
San Diego, CA 92101

fFarley@att.net

(619) 231-5970

September 12, 2005

TO: Alexandra Elias
CCDC

FROM: Michael Yee *MY*
President
San Diego Chinese Historical Society & Museum

SUBJECT: PDO and EIR Historical Resources Report – Asian Pacific Thematic Historic District Master Plan - Updated

19.1 [This is express concern about the lack of mention of the Asian Pacific Thematic Historic District Master (APTHD) plan (1995). That focus plan has some valuable details that are not included in the Historic Resources Report section of the Downtown Community Plan EIR and the PDO.

19.2 [The plan, or the historic and future development planning that it describes, should be mentioned as it shows the buildings and historic impacts in more detail than the EIR version dated June 2005. Other planning areas have their own planning documents, the APTHD has only one and is easily overlooked. We acknowledge the EIR may have new information which is appreciated.

Many people, including the San Diego Chinese Historical Museum, the Asian Pacific Historic Collaborative, Asian Business Association, and community members including Tom Fat, are concerned with the lack of mention in the community plan and the EIR. Comments and suggestions were submitted at the last meeting of the Community Plan committee earlier in 2005, and again brought up to Beverly Schroeder on August 22, 2005.

19.3 [We realize the level of detail in the community plan and the PDO and EIR cannot include the level of detail in the district master plan. We ask however, that some reference to the master plan be in the new governing documents of the updated community plan and EIR, so they can be applied when needed.

Your help in meshing the plans in the Asian Pacific Thematic Historic District with the new downtown community plan is appreciated. Thank you.

19.1 References to the Asian Pacific Thematic Historic District Master Plan have been added to pages 4-34 and 5.3-15 of the Final EIR. The addition on page 4-34 acknowledges the fact that the District Master Plan would continue to provide historic context to the neighborhood. On page 5.3-15, a statement has been added that confirms that the Master Plan was adopted by the Redevelopment Agency in 1995.

19.2 The information on historic resources used in the analysis contained in Chapter 5.3 of the EIR is considered adequate. As indicated on page 5.3-1 of the EIR, the baseline for historic structures was based on four separate surveys of downtown by well-qualified consultants.

19.3 See response to comment 19.1.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

10 September 2005

To: Ms. Alexandra Elias, Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, California 92101-5074

Subject: Draft Environmental Impact Report
Proposed San Diego Downtown Community Plan, Redevelopment Plan for the
Centre City Project Area and Centre City Planned District Ordinance

Dear Ms. Elias:

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

Based on the information contained in the DEIR, we have the following comments on the mitigation measures as presented in Table 1.3-1:

- 20.1 1. Mitigation Measure CUL-A.1-1 states that "If the building/structure has been previously determined not to meet any of these four criteria, no additional action will be required." It needs to be considered that the resource may have become significant since that previous determination was made. There are several reasons this could happen, including something as simple as reaching the age threshold to having an association with a person whose importance arose since the earlier evaluation.
20.2 2. In Mitigation Measure CIL-B.1-1, the statement at the end of "Step 1 - Initial Evaluation", "No further action is required..." applies to historical archaeological potential, not prehistoric potential. The downtown area was substantially developed prior to any cultural resources evaluations, so the relative absence of recorded sites is not a reliable indicator that such resources do not exist. The possibility of prehistoric resources must also be considered.
20.3 3. In "Step 3 - Data Recovery" of that same mitigation measure, there is a need to set a reasonable deadline for submittal of the report and curation of any resulting collections. We suggest that CCDC adopt the same criteria currently being applied by the City's Development Services Department. The same applies in the fifth bullet ("A report describing...") under "Step 4 - Monitoring".

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SEP 20 2005

20.1 The Historical Resources Guidelines of the Land Development Code state: "Evaluations will not be required if the resource has been evaluated for CEQA significance or for National Register eligibility within the last five years if there has been no change in the conditions which contributed to the determination of significance or eligibility. A property should be re-evaluated if its condition or setting has either improved or deteriorated, if new information is available, or if the resource is becoming increasing rare due to the loss of other similar resources."

Furthermore, as discussed on page 5.3.22 of the EIR, prior to the issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, (the CEQA threshold age), CCDC shall determine whether the building/structure meets any one of four criteria: National Register listed or determined eligible, California listed or determined eligible, San Diego Register listed or determined eligible, or the CEQA criteria for historical resources. If the building/structure meets any one of these four criteria, it is treated and protected as a historic resource under the City's regulatory process. If it meets none of these criteria, but is in excess of 45 years of age, it follows the same process that applies in the rest of the City of San Diego, as is more extensively discussed in response to comment 23.3.

As discussed in Section 5.3.1.1, extensive historical survey activity in the Centre City Redevelopment Project area has transpired over the past 17 years. And, as the result of this activity, the historical building/structure database is both extensive and thorough. Several hundred properties have been evaluated and cleared by the Historic Resource Board (HRB) or have been designated by the HRB as a local landmark. Structures that have as yet not been evaluated will be reviewed by CCDC if they are more than 45 years of age at the time that a redevelopment proposal is presented which could affect them. Since City of San Diego permits voluntary and involuntary designation applications and re-initiation of designation applications based new information, if a property, which was not found eligible under national, state, local or CEQA standards, is later found to possess significance, a designation action may be pursued.


- 20.2 The potential for subsurface prehistoric resources is inherent in Mitigation Measure CUL-B.1. A determination that no further action would be required after Step 1 would be based on clear and convincing evidence that the potential for subsurface material is sufficiently low as to negate the need for testing. Such evidence could include proof that the subsurface soil had been previously disturbed to sufficient depth. In the interest of clarity, the last sentence of Step 1-Initial Evaluation has been revised in the FEIR to read as follows: “Historical and existing land uses shall also be reviewed to assess the potential for significant prehistoric and historic archaeological resources to be present”.
- 20.3 CCDC recognizes the importance of setting time limits. To this end, Step 3 of Mitigation Measure CUL-B.1 already contains a deadline for submitting a report summarizing the data recovery program. The requirement for submittal of the report within 12 months of the date the data recovery was initiated is considered appropriate to allow the recovery, cataloguing and research to be completed in a timely fashion. With respect to Step 4, the measure already requires monitoring summary reports to be submitted to CCDC within 30 days of the completion of monitoring. Similarly, proof of curation of artifacts must be submitted to CCDC within 30 days of curation.

COMMENTS

RESPONSES

Thank you for providing SDCAS with this opportunity to participate in the public review of this project's environmental documents.

Sincerely,


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

cc: SDCAS President
File



Mr Peter Hall
 President
 Centre City Development Corporation
 225 Broadway Suite 1100
 San Diego, CA 92101-5074

SEP 2 2005

Dear President Hall,

We have reviewed the "Draft Environmental Impact Report for the Proposed San Diego Downtown Community Plan, Redevelopment Plan For the Centre City Project Area and the Centre City Planned District Ordinance" and your letter dated 28 July 2005 regarding the Draft EIR.

Our Comments as follows are in order from the Draft EIR and not in order of importance.

21.1

Table 1.3-1 "Significant Impacts and Mitigation Measures:
 Page 1-13 Impact LU-B.1/B.4: Noise. Mitigation should include mandatory disclosure to renters and buyers that a mixed use urban environment by its nature will have more noise than a purely residential area. Reasoning that some people are more sensitive to noise, they should be made aware before renting or buying that the area has significant noise levels that can not be mitigated. The ability of the Agency to require covenants on all properties which require a Permit should enable implementation.
 Page 1-14 Impact NOI-A.1/D.2: Noise. Same as LU-B.1,...B.4.

21.2

Table 1.3-1 "Significant Impacts and Mitigation Measures"
 Page 1-18 Impact TRF-A.1.2/D.1 Recommend study at five year intervals in connection with Parking Mitigation Study. See Section 5.2.3.2 below.

21.3

Table 1.3-2 "Relevant Goals and Policies from the Downtown Community Plan".
 Page 1-21 "Transportation, Circulation, Access and Parking" Policy 7.1-P-1 "cross section(s)" were not carried forward from first draft to Public Hearing Draft of the Community Plan. Insert in Community Plan or Delete from EIR.

21.4

Table 5.2-10 "Parking Demand"
 Page 5.2-23 Parking. "For purposes of this assessment, baseline parking demand ratios used by the City of San Diego were assumed." The

21.1 As indicated in response to comment 14.4, the disclosure of the existence of noise in the downtown urban area does not mitigate the noise produced by the railroad activities.

21.2 Studies of traffic and parking conditions at five-year intervals are required by Mitigation Measures TRF-A.1.1 and TRF-D.1.

21.3 The reference to street sections in the FEIR has been eliminated.

21.4 The parking shortfall identified in the EIR is based on a comparison the parking demand based on the City's demand factors and the parking requirements imposed by the proposed PDO. Thus, the EIR does reflect the basis of comparison suggested in this comment.

21.4
Cont.

values as set forth in the Table are between 35% and 110% above the minimums established in the Planned District Ordinance (PDO). If the City's Demand Ratios were used for calculating parking shortfalls and the PDO will be used to implement building, then the shortfall predicted and its impacts are severely understated. We agree wholeheartedly with the five year reviews of parking impacts.


21.5

Section 5.2.3.2 "Trip Generation" and associated impacts in Table 1.3-1 "Significant Impacts and Mitigation Measures" TRF-A.1.2/D.1

Page 5.2-23 The trip generation model based on a study by S. Pazagadi, August 1990 as noted in the PDO is extremely dated and does not reflect the current denser use in the Centre City. In the last 15 years a large number of residential orientated retail and commercial establishments have begun operating in the Centre City promoting significantly more trips by other modes than private auto. A new study needs to be done to more accurately reflect the current trends in the Centre City. Recommend that such a study be included as part of the five year reviews of parking impacts such that parking and traffic would both be reviewed at these intervals. A more accurate assessment will affect the impacts on circulation within and in and out of the area.

Thank you for your consideration of our input.

Sincerely,


Gary Smith
President

San Diego Downtown Residents Group
PO Box 124715
San Diego, CA 92112
www.sddrg.org/president@sddrg.org

21.5 As indicated on page 5.2-16 of the EIR, the traffic generation at buildout was based on a Regional Transportation Model developed by SANDAG. This is a highly complex computer model which encompasses a number of factors which can influence trip generation. Most notably, it specifically considers the availability of mass transit which is a major component of the downtown transportation system. This model is not based on 1990 information. To avoid confusion, the trip generation rates in the PDO will only be included as necessary to serve as a basis for calculating the traffic generated within the Sports/Entertainment District to assure that the total trips do not exceed the maximum cap established for the District.



SAN DIEGO & IMPERIAL VALLEY RAILROAD COMPANY, INC.

1501 National Avenue • Suite 200 • San Diego, CA 92113-1029 • 619-239-7348 • Fax 619-239-7128

9/9 Alex Bostrom

September 4, 2005

Mr. Peter Hall, President
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Subject: Environmental Impact Report for the San Diego Downtown Community Plan

Dear Mr. Hall,

San Diego and Imperial Valley Railroad (SDIV) is the operator of the San Diego & Arizona Eastern Railway routes between San Diego & El Cajon, and San Diego and San Ysidro. The San Diego & Arizona Eastern Railway is owned by the Metropolitan Transit system (MTS). Freight cars are delivered from the BNSF Railway to the SDIV rail yard located just east of Harbor Drive near PETCO Park. In 2004, SDIV moved more than 8000 carloads resulting in the reduction of at least 50,000 regional truck trips on San Diego area freeways.

SDIV has similar issues to waterfront industries in that we are geographically constrained, and there are no economically viable options for relocation. Freight rail growth continues, and is important to ensure that the rail infrastructure has the ability to accommodate this growth. Incompatible land uses could lead to the curtailment of some operations, and a loss of options for future growth.

The update of the Downtown Community Plan could allow the introduction of residential projects in close proximity to the SDIV rail operations. The concerns of this rail operator regard emissions and noise levels which are part of the routine operations. The SDIV has an additional issue in the fact that its operations must occur at night due to the limited freight operating window on the Trolley line. This is where the incompatibility lies, and is the fundamental issue our railroad. The specific issues of items of interest to SDIV in the EIR involve land use, noise, and air quality.

Land Use

The SDIV railroad yard and mainline should not be considered as a buffer between residential and industrial, as our operations generate some of the same noise and emissions that would make industrial and residential proximity incompatible. As stated in the EIR, noise generated by railroad activity would significantly impact noise sensitive uses located nearby. Railroad noise includes not just horn noise at crossings, but engine, wheel, and car coupling noises. Although the average noise levels generated by railroad activities would not exceed 24-hour average standards, SDIV operates at night in order to use the Trolley tracks during off hours,

A RailAmerica Company

22.1

22.2

22.1 The potential for land use conflicts related to noise from railroad operations near residential development is identified on page 5.1-19 of the EIR and further described on page 5.7-14. Air quality impacts are discussed on pages 5.8-10 and 11 of the EIR.

22.2 The conclusions of the EIR reflect those of this comment. Railroad operations (including engine and wheel noise) are identified as a significant land use conflict with residential uses. Furthermore, due to lack of certainty that adequate measures can be enforced to alleviate this potential conflict, the EIR concludes that the land use conflict would be significant and not mitigated to below a level of significance.

22.2 Cont. and the railroad noise would disturb sleep patterns of persons living nearby to the railroad tracks and rail yard.

22.3 The Downtown Community Plan would include a policy which would seek establishment of quiet zones and enforce ban on sounding of horns (Policy 13.4-P-2). However, this policy would not address the rail noise which is produced for normal operations such as switching, and train movement. Additional measures should be taken to ensure that any development land use does not experience unacceptable noise impacts from rail.

Noise

22.4 The Noise Impact Analysis Appendix to the EIR stated that use of horns is discretionary with the engineer. In fact, the CPUC code requires operation of the horn. Failure by the engineer to do so has been a misdemeanor (Section 7678). The FRA final ruling on the use of train horns now preempts local and state jurisdiction on the use of train horns. This Federal regulation requires the operation of the horn unless an FRA approved quiet zone is in place. The use of a quiet zone does mitigate the noise impact of train horn noise in the areas of heavy residential use. But safety cannot be compromised. SDIV looks forward to working with CCDC on the establishment of the proposed quiet zone in the downtown area.

22.5 The EIR does state that some train noise is not mitigatable. For this reason, every effort should be made to evaluate, measure, and mitigate the impacts of rail noise to residential projects prior to those projects being approved. Noise from railway operations is governed by the Federal Noise control Act of 1972. Maximum noise levels for rail operations are contained in 40 CFR 201. With noise from rail operations not being subject to the City Noise Ordinance, the assumption cannot be made that exterior noise levels from rail operations at residential sites can be controlled by that Ordinance. A procedure should be in place to determine to projected exterior noise level at any residential site, and if this level is exceeded, the use of the site for residential should be discouraged. In addition, prior to issuing a building permit, the project should maintain noise levels to conform to the General Plan Noise Element and the California Noise Insulation Standards. Land Use Impact LU-B.4 should be expanded to include rail yards, and yard switching activities as noise sources. Land Use Mitigation Measure LU-B.4-1 is appropriate for evaluating the impact on train noise on residential projects.

Air Quality

22.8 The California Air Resources Board (CARB) released guidelines to address the relationship between common stationary source emission generators and residential areas in 2005. These guidelines are based on the impacts related to diesel-powered equipment such as locomotives. Although CARB emphasizes that the guidelines are "advisory and should not be interpreted as defined "buffer zones." But the 1000 ft. advisory separation between residential and rail yards should be used as a point at which to begin to evaluate the impacts to specific proposed

22.3 The train horns and crossing bells are considered the primary source of land use compatibility conflicts between railroad operations and residential uses due their sudden occurrence and stark contrast with ambient noise conditions. Wheel noise and engine noise is considered less disruptive and not considered worthy of additional mitigation.

22.4 Comment noted. However, this distinction does not affect the validity of the analysis because the analysis assumed that the use of train horns does regularly occur within the downtown area.

22.5 Comment noted. The analysis in the acoustical study did not assume that trains would be subject to the City's Noise Ordinance.

22.6 As indicated in response to comment 14.1, train noise is not expected to exceed the exterior significance threshold of 65 dB CNEL at nearby sensitive uses. In addition, in accordance with Title 24 of the State Code, no development would be allowed which could expose persons to noise levels in excess of 45 dBA L_{eq} within habitable rooms.

22.7 This information has been added to the FEIR on page 5.1-19.

22.8 As indicated on page 5.8-10, the proximity of the rail yards to future residential uses within the Proposed Community Plan would not constitute a significant impact due to the long-term exposure required to produce a significant human health risk.

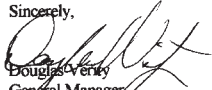
22.8
Cont.

projects. Each proposed sensitive land use project within 1000 ft. of the rail yard should be evaluated for impacts from rail related mobile emission sources.

We remain concerned about the possible long term impacts of the Community Plan to industrial, rail and port operations. By establishing a baseline from which to evaluate the impact to each residential project from our rail operations, we can properly address and possibly mitigate the impacts to the future residents. The operations of this railroad are important in regional freight transportation efforts to reduce freeway congestion, and reduce emissions, and enable economic growth. We hope to partner with CCDC in establishing a vibrant and economically strong community with compatible land uses, while maintaining a strong industrial base and providing quality jobs.

San Diego & Imperial Valley Railroad appreciates the opportunity to respond to the Environmental Impact Report for the San Diego Downtown Community Plan

Sincerely,



Douglas Verity
General Manager
San Diego & Imperial Valley Railroad



Save Our Heritage Organisation

2476 San Diego Avenue · San Diego CA 92110 · www.sohosandiego.org
619/297-9327 · 619/291-3576 fax

September 9, 2005

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Alexandra Elias
Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Re: Draft EIR Downtown Community Plan
PDO & Redevelopment Plan for Centre City Project Area
SCH No. 2003041001

Thank you for the opportunity to comment on this important document. While it has gone a long way to address concerns related to environmental impacts associated with the adoption and implementation of the plan, there are still several mitigation measures that need to be incorporated in the section dealing with Cultural Resources.

CUL-A.1: To encourage the retention, restoration, and adaptive reuse of state, federal and locally designated sites on site. TDR's (Transfer of Development Rights) should be made available to affected property owners and these rights shall be transferable within the Greater Centre City PDO.

Additionally a receiver site should be set up for the relocation of smaller historically designated buildings consistent with overall goals set out in the City of San Diego General Plan. The best area for this to occur is on 17th Street from Market Street South to "J" Street. This area currently has a very high concentration of small historic sites with room for many more on sites now occupied by single-story cinder block warehouses. This area was originally part of Sherman Heights and should be incorporated into the Sherman Heights Historic District. Not only would this meet the goals of the San Diego General Plan, it would facilitate the redevelopment of parcels that include smaller resources while mitigating impacts to historic resources. This will also provide a height and density buffer not only desirable from an aesthetic and livability point of view, but is consistent with the proposed Downtown Community Plan. The infrastructure should be prepared and upgraded along the 17th street corridor to make this a very desirable and attractive area. Other historic resources could also be relocated on the freeway lids proposed in the Sherman Heights area.

Projects involving San Diego Registered sites designated under criteria A, B, C & D and any sites that have not been reviewed in the last five years must be reviewed by HRB staff and if not consistent with the Secretary of the Interior's

23.1

- Welton Jones
- Mike Kelly
- Carmen Pauli
- Christopher Pro

23.2

- Tim Rudolph
- David Swarens
- Bruce Coons,
Executive Director

23.3

SEP 13 2005
12:30 p.m.

23.1 The Proposed Community Plan will be revised to allow TDRs to be made available to projects within a one-block radius of an historic structure.

23.2 The concept of a receiver site has been discussed in the past, especially lately with reference to mitigation of specific buildings in the East Village. While concentration of historic buildings which cannot be preserved in place would be better than recordation and demolition, the feasibility of such a proposal is doubtful because of land costs and space availability.

23.3 Comment noted. The City of San Diego Historical Resources Guidelines in the Land Development Code requires evaluations if one has not been undertaken in the last five years. In addition, the Historical Resources Board (HRB) is required to review any Site Development Permit where a historic resource is present, or the site lies within a historical district, unless such proposal is exempt as consistent with the Secretary of the Interior's Standards. A Site Development Permit may not be considered

COMMENTS

RESPONSES

by the decisionmaker until the Historical Resources Board has reviewed the Permit application and made a recommendation on its approval. As discussed in response to comment 20.1, CCDC would review the status of any building over 45 years of age.

COMMENTS

RESPONSES

23.3
Cont.

Standards for Rehabilitation must go to the full HRB for review and comment. Failure to follow this procedure should result in preparation of a focused EIR to review the specific impacts to the affected historic resources.

23.4

Stronger language should be used in the plan to encourage the retention, restoration, and adaptive reuse of historic buildings within the plan area. This language should be consistent with the conservation element of the City of San Diego General Plan now circulating in draft form.

SOHO's goals are to preserve enough of the historic fabric and character of San Diego to maintain our unique sense of place while we build the San Diego of the future. We believe this is an issue important to the majority of San Diegans.

Thank you again for the opportunity to help with this important process.

Sincerely,



Bruce Coons
Executive Director

23.4 Comment noted. The Proposed Community Plan does seek to preserve historic resources through policies encouraging preservation and a TDR program intended to make preservation more economically viable for historic building owners. As the language in the referenced Conservation Element is not formally adopted, conformance is not required.

September 12, 2005

Alexandra Elias, Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

RE: Draft EIR for the San Diego Downtown Community Plan, Centre City PDO
Air Quality Analysis performed by Giroux & Associates

Dear Ms Elias:

For the most part, the analysis appears to document that the portion of the air basin bounded by the Community Plan is currently reasonably good and that air quality shouldn't deteriorate greatly under the several scenarios considered. However, the existing data cited for PM-10 coupled with projections made for increased traffic within the development area should be a cause for serious concern. Table 3 of the Giroux report shows that there were 11 days in 2003 that exceeded California standards for "Inhalable Particulates (PM-10)," and the data for the 6 year span beginning in 1998 suggest an increasing trend, though the number of data points is perhaps too small to remove any doubt that a increasing trend exists. Table 4 (p. 19) provides a summary of regional emissions for 2005 and estimates of what might reasonably be expected for 2030 under the 1992 plan and under the proposed plan. Table 3 does not provide data for 2004 or for 2005, but because figures are given for 2005 in Table 4 it seems reasonable to assume that the data do exist (although 2005 is not yet over and thus we cannot know how many days exceeded California's standard). Moreover, Table 4 shows total PM-10 for 2005 in pounds/day, which is not directly comparable to the figures in Table 3. Thus, in the absence of appropriate data for 2004 and 2005, we cannot see whether what appears to be an increasing trend through time is verified.

More importantly, a comparison of the figures for PM-10 for 2005 with projected estimates under the two plans considered shows an alarming increase in PM-10. The increase between 2005 and 2030 (1992 Plan) is 70%, which should be cause of concern, but the increase between 2005 and 2030 (Proposed Plan) is even higher: 110%.

As the Giroux report points out (p. 18), "PM-10 emissions primarily derive from roadway dust and tire or break wear. ... PM-10 emission rates will grow in direct proportion to downtown development without benefiting from continued emission reductions from a cleaner vehicle fleet. Future PM-10 emissions associated with planning area traffic will therefore be significantly higher for both the 1992 Plan or the proposed Community Plan alternatives." What the report does not point out, however, is that the projected figure for the proposed plan is 23% higher than for the 1992 plan.

Given the detrimental health affects of PM-10 (Table 2), I urge CCDC not to underestimate the importance of the large increases in PM-10 that are likely to occur under the proposed plan, or to presume that the detrimental effects will somehow be ameliorated because the proposed plan constitutes "smart growth" (Giroux report, p.22).

24.1

24.1 The analysis of PM₁₀ impacts of development in accordance with the Proposed Community Plan is not dependent on past records. Rather, it is based on the anticipated PM₁₀ generated by future construction and mobile-source emissions. Therefore, no revisions to the EIR are required in response to this comment.

24.2

24.2 A comparison of the Proposed Community Plan with the adopted 1992 plan represents a plan to plan analysis. CEQA requires an evaluation of impacts based on a plan to ground condition which assesses the absolute condition rather than a comparison the net change. Consequently, the exact percentage of increase from the 1992 Plan is not relevant to the EIR analysis contained in Chapter 5.8. A qualitative, plan-to-plan comparison of air quality effects is contained in Chapter 10 on page 10-4. Although the percent reduction is not quantified as 23%, the discussion does note that the air emissions would be less under the adopted Community Plan due to the lower development potential.

24.3

24.3 The EIR recognizes the potential impact associated with PM₁₀ which is why it includes Mitigation Measure AQ-B.1.1 which is designed to minimize PM₁₀ generation.

24.4

Finally, I note that the Giroux report appears to rely entirely on air quality data provided by the San Diego Co. APCD for the development, and that all of these data appear to come from a single "APCD air quality monitoring station located on 12th Street in downtown San Diego" (p. 8). Admittedly, air pollutants are carried about throughout the development area, but we should not assume that they are stirred into a homogeneous mix. A more reasonable assumption is that there are and will be "hot spots" where air quality is significantly worse, on average, than air quality at the monitoring station on 12th Street (note that we are not told where the monitoring station is located on 12th Street). Under the proposed plan are there likely to be "hot spots" near schools? Near pocket parks? Near outdoor eating areas? Before proceeding with the favored plan, this question should be addressed.

Sincerely,



Boyd Collier, Ph.D.
Prof. of Ecology, Emeritus, SDSU
850 Beech Street, Unit 808
San Diego, CA 92101

24.4 Traditionally, air quality is considered to be adequately represented by local air quality monitoring stations. The station used for the EIR is considered particularly represented due to its proximity to downtown due to its location near the intersection of Twelfth Avenue and J Street. Normally, localized air quality impacts are limited to high carbon monoxide levels (known as "hot spots" related to traffic congestion. However, as indicated on page 5.8-8, no "hot spots" would occur within downtown with buildout in accordance with the Proposed Community Plan.



19th Floor | 501 West Broadway | San Diego, CA 92101-5908
619-338-6500 office | 619-234-3815 fax | www.sheppardmullin.com

Writer's Direct Line: 619-338-6524
djones@sheppardmullin.com

Our File Number: 0Y53-116851

September 12, 2005

Mr. Peter Hall
President, COO
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Ms. Alexandra Elias
Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Re: Comments on the Draft EIR for The Downtown Community Plan Update
– Retreat from Residential Development of Blighted Areas near Barrio
Logan (the "Unocal Site").

Dear Mr. Hall and Ms. Elias:

As you may know, this firm represents Trammell Crow Residential in its efforts to restore the blighted Unocal Site in the East Village area near Barrio Logan. After three years of planning and discussion, a 35-member Steering Committee comprised of planners and stakeholders recommended an increase in residential densities within downtown San Diego and assigned the Unocal Site a FAR of 4, with the ability to increase to a FAR of 6 with implementation of certain incentives. The Community Plan update circulated in November 2004 included the FAR of 4 with an additional 2 FAR with incentives, which accomplished the goals of the City of San Diego General Plan and Progress Guide for increasing density and intensity of residential development downtown.

25.1

In an unfortunate retreat from this residential density increase policy, however, CCDC downgraded the FAR to the same FAR of 3 that has been in place on the site since the 1992 Community Plan. This came following private meetings between CCDC staff and some members of the Barrio Logan community, who apparently are concerned that tall residential skyscrapers would "wall off" Barrio Logan from downtown. Ironically, this proposed reduction in FAR will guarantee for Barrio Logan their worst fears because without an increase in the FAR, the "wall of environmental contamination" at the Unocal Site will drive away development and separate Barrio Logan from the benefits of downtown's redevelopment.

25.2

Should the CCDC decide not to restore the Steering Committee recommended FAR of 4, with the possibility of increasing that with incentives to an FAR of 6, then Trammell Crow Residential respectfully requests that the EIR's Alternative Analysis Section contain a full discussion of the FAR 4 option so the City Council can make an informed decision of the consequences of maintaining the existing FAR of 3. Such alternative analysis should include a discussion of the consequences stated below.

25.1 This comment does not raise any issues related to the adequacy of the EIR. Therefore, no response is necessary.

25.2 Consideration of an alternative FAR for the referenced property is not warranted in the EIR. Alternatives are only discussed when they may lessen a significant environmental impact. As no significant environmental impact would occur from the proposed FAR of 3.0, consideration of alternative FARs is not necessary.

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Mr. Peter Hall
September 12, 2005
Page 2

First, a FAR of 4 or 6 does not require Trammell Crow Residential to build tall residential structures that leave Barrio Logan in the shadow of downtown's redevelopment. Many design options exist for Trammell Crow Residential to build mid-size structures, but only if an adequate FAR exists. The underground environmental contamination at the site escalates the cost of any project design, such as a building parking structure, that develops below ground. Therefore, an economically viable project is best achieved with a higher FAR.

Second, residential development makes the highest and best use of the land, which makes the extensive environmental cleanup costs at the Unocal Site more affordable. The short supply of housing relative to high demands in our growing region of the country have attracted a significant number of investors to the residential housing market in San Diego. This provides the resources to assist with the clean up of contaminated areas of the Unocal Site. In contrast, lower FARs may make any development infeasible at the site. Historically, the actual cost of environmental cleanups far exceeds their estimated cost. Per 2.1.2 of the Draft EIR, the purpose of the redevelopment plan is to eliminate blighted conditions. That goal will not be achieved by keeping the FAR at 3; the land will continue to sit vacant and contaminated for years unless an adequate FAR is placed on the property. Therefore, CCDC would be best served to increase FAR levels in a manner that will attract the type of development that is best suited to actually remove the contamination and blight now on the site.

Third, restoring the FAR to 4 to 6 at the Unocal Site is more consistent with San Diego's General Plan. Draft EIR Section 3.3.1.1, acknowledges that the City of San Diego Progress Guide and General Plan ("General Plan") is the comprehensive long-term plan for the physical development of the City of San Diego and that it considers downtown as the focus of metropolitan San Diego. The General Plan's Strategic Framework Element encourages the further intensification of downtown by developing it as a major urban residential center with the largest concentration of high density multifamily housing in the region. The General Plan's objectives call for strengthening the viability of downtown through renewal, redevelopment and new construction. Furthermore, Draft EIR Section 4.5.2.1 provides that the Community Plan Update is designed to "achieve building intensities that ensure efficient use of available land" using a strategy that "target[s] a residential buildout population of 90,000 people of diverse incomes to create a vitality, a market for a broad array of supporting stores and services, and opportunities for living close to jobs and transit." Abandoning the Steering Committee's recommendation to increase the Unocal Site's FAR to 4 and instead maintaining the FAR of 3 from the 1992 community plan is less consistent with the General Plan's goals and objectives.

Fourth, vacating the FAR increase at the Unocal Site is less consistent with the SANDAG Regional Comprehensive Plan ("RCP"). Draft EIR Section 3.3.2.1 acknowledges the RCP's goal of reducing the number of housing units and residents expected to be "exported" from the region by 2030 by directing growth instead to areas inside the San Diego region that constitute "Smart Growth Opportunity Areas." The Unocal Site is just such a Smart Growth Opportunity Area because it would replace a contaminated area with a multi-family structure

25.3

25.3 The economic feasibility of developing the subject property at a FAR of 3.0 is beyond the purview of the EIR. Thus, no conclusion may be drawn as to the potential for the existing hazardous materials to continue to exist on the property.

25.4

25.4 A FAR yield of 4.0 rather than 3.0 would not represent a substantial conflict with the land use goals of the City's General Plan.

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Mr. Peter Hall
September 12, 2005
Page 3

25.5

along trolley lines, proposed regional transportation corridors and near employment uses. If the Draft EIR truly reflects a plan where "Downtown would *maximize* its infill development potential by encouraging multi-story residential ... in appropriate areas," then CCDC should support a FAR of 4 at the Unocal Site. (DEIR at p. 3-10, *emphasis added*).

There is no dispute that the need for residential housing in downtown San Diego remains great. The City Council of the City of San Diego has declared a housing crisis in San Diego. The General Plan, the SANDAG Regional Plan, and the goals and strategies of the Draft EIR require policymakers to maximize smart growth opportunities that increase residential densities in downtown San Diego. Vacating the Steering Committee's recommendation to set the FAR at 4 for the Unocal Site not only ignores the opinions of the Steering Committee but also is inconsistent with the mandate of the General Plan and other planning documents that call for increasing the density and intensity of residential development downtown, near transit. It also will result in leaving the property barren, contaminated, and unable to meet the region's housing needs.

25.6

The Unocal Site can be a redevelopment success story. Therefore, Trammell Crow Residential respectfully requests that the Downtown Community Plan restore the recommended FAR 4 with incentives allowing the FAR to increase to 6 at this site. At a minimum, the Final EIR's Alternative Analysis section should fully examine the FAR 4 option as discussed above so the City Council can make an informed decision as to the appropriate FAR.

Sincerely,



Donna D. Jones

for SHEPPARD MULLIN RICHTER & HAMPTON LLP

W02-SD-8/03/15/1392148.4

Cc: Brad Perozzi
Garry Papers
Barbara Warden
Kevin Casey

25.5 Support for any specific FAR is outside the role of an EIR.

25.6 See response to comment 25.2.

ASARO KEAGY FREELAND MCKINLEY & BARTZ LLP

ROSCOE D. KEAGY
RICHARD R. FREELAND
STEVEN A. MCKINLEY*
LINDA D. BARTZ
*ALSO ADMITTED IN NEVADA

ATTORNEYS AT LAW
FOURTH FLOOR
3170 FOURTH AVENUE
SAN DIEGO, CALIFORNIA 92103
TELEPHONE (619) 297-3170
FACSIMILE (619) 299-4268

FRANK L. ASARO
OF COUNSEL
CHARLES F. CAMPBELL
OF COUNSEL

September 12, 2005

Centre City Development Corporation
225 Broadway, Suite 1100
Mail Station 51D
San Diego, CA 92101
Attn: Mr. Walter Rask

Re: Downtown Community Plan MEIR (Master Environmental Impact Report)

Dear Mr. Rask:

Our firm represents Smart & Final Stores Corporation in regard to the proposal to modify the Redevelopment Plan, Community Plan and Planned District Ordinance which govern the development of downtown San Diego.

This letter pertains to Smart & Final's property and retail store located at 720-15th Street, San Diego. This site is designated in the Centre City Community Plan Update as part of a community park.

Designation of this area as a community park is inappropriate due to the fact that the area is adequately served by existing park facilities at San Diego City College, San Diego High School and Balboa Park. In addition, the proposed park footprint is unnecessarily large for this portion of the community.

In addition, we believe that this site is not suitable for a park because it is located on two freeway couplers. The traffic and noise impacts are very significant at this site. The same traffic impacts make our site very suitable for our business, as well as other types of redevelopment.

It is our strong desire to continue to operate our retail store at this site. In the alternative, we would consider redeveloping our site as a residential/commercial mixed-use project consistent with the redevelopment plan. In this structure, we would remain both developer and tenant.

Therefore, we respectfully request that the plan be revised to omit the proposed community park designation from our property.

Very truly yours,

ASARO KEAGY FREELAND MCKINLEY & BARTZ LLP

Roscoe D. Keagy
Roscoe D. Keagy

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 13 2005

Orig. To: _____
Conv. To: _____

RDK:kmk
cc: Smart & Final Stores Corp.

- 26.1 As discussed in response to comment 7.1, the downtown area needs additional park land.
- 26.2 The potential for proposed parks to be impacted by traffic noise is identified on page 5.7-15 of the EIR. However, traffic volume, as an issue in and of itself, on adjacent streets would not be sufficient to make the proposed parks inappropriate for recreation.

26.1 []
26.2 []

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ERIC J. PROSSER
ELOISE H. FEINSTEIN

LAWYERS
Union Bank of California Building
530 "B" Street, Suite 1700
San Diego, California 92101-4454
Telephone (619) 234-0361
Fax (619) 234-4786

OF COUNSEL
PAUL A. PETERSON

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 12 2005

Orig. To: _____
Copy To: _____

www.petersonprice.com

File No.

6965.001

September 12, 2005

Ms. Alexandra Elias, Senior Planner
CCDC
225 Broadway, Suite 1100
San Diego, CA 92101

Dear Alexandra:

We represent Ghods Builders Inc. and its principal, Ghasem Ghods, with regard to property which is located at 6th and 7th Avenues and "A" Street and 8th and 9th Avenues and Broadway and "C" Street.

27.1

Our client opposes the decrease in FAR that has been assigned to these sites and would request that the EIR address and respond to the attached letter to Joseph Wong Design Associates dated September 7, 2005.

Our client would request that the Plan be modified to allow the existing Base FAR for these properties and then provide the FAR Bonus above the current level.

27.1 As the attached letter raises no issues related to the adequacy of the EIR, no response is necessary.

COMMENTS

RESPONSES

Ms. Alexandra Elias, Senior Planner
CCDC
September 12, 2005
Page 2

Thank you for your courtesy.

Sincerely,

PETERSON & PRICE
A Professional Corporation



Matthew A. Peterson

Enclosure

cc: Gary Papers, Manager, Architecture & Planning
John Baumgardner, CEO, Ace Parking Management, Inc.
Ghasem Ghods, Ghods Builders Inc.

Ghods Builders Inc.

September 7, 2005

Joseph Wong Design Associates
2359 Fourth Avenue Suite 300
San Diego CA 92101

Sent Via Fax @ (619) 237-0541

Dear Joseph Wong

**Re: Development Sites at 6th and A Street and 8th 9th, and Broadway
Our Proposals regarding new PDO requirements for respective sites**

Please find enclosed two charts each one comparing the existing PDO to the Newly revised draft PDO requirements along with our proposal for changes for our development site at 6th and A Street and for our other development site located at 8th, 9th and Broadway.

With reference to our site located within the block of 6th A Street, 7th Street and Ash Street, the existing PDO entitles our site to have a total residential density of 10 and our site would be designed to have an additional 2.0 FAR bonus which would be applicable under the Street Level use incentive plan which we plan to implement.

Under the newly revised Draft plan PDO, our residential FAR has been reduced to 9.0 from a designated 10 Residential FAR plus an additional 2 FAR Street level use incentive making the total FAR to be 12, while the majority of the sites within the City Center Planned District have had their FAR increased. Specifically immediately adjacent to our site there is an area that has had their FAR increased to a maximum potential of 20 FAR including bonus and TDR entitlements. Upon further analysis of the newly revised Draft PDO we note that this particular site in question has a Base FAR of 12 plus 2.0 bonus FAR for specific amenities and an additional 6.0 FAR that they would be entitled to under parks TDR making it a total of 20 FAR. Since our site is centrally located within downtown San Diego and accessible to all amenities, and is in such close proximity to the areas which are entitled to a maximum residential FAR of 20, we are proposing that the CCDC at least grant us the base minimum FAR of 12 for this particular site along with the 3.0 FAR Bonus entitlements for specific amenities that would have to be achieved in addition to park TDR. In fact we would like both our sites to be entitled to receive or to have the ability to purchase additional density from other sites if required.

With reference to our site located within the Block at 8th, 9th Broadway and C Street, under the existing PDO, the Residential FAR is 12, as well as the additional 2.0 Street level use incentive that our site would be entitled to would bring it to a total of 14.0 FAR. However, under the newly revised PDO our FAR has been reduced to 10. We understand that there is an urban open space planned for the property immediately to the north of our site on C Street and we have every intention to comply with the Sun Access Height Limits however, we would respectfully request of the CCDC not to penalize our site for the development of a park area. Surely a park area would add to the beautification of the immediate area in terms of green space, recreational and pedestrian usage, however, we feel

695 Town Center Drive Suite 230 Costa Mesa, CA. 92626
Telephone: 714-751-9020 . Fax: 714-751-9028
www.Ghodsbuilders.com

COMMENTS

RESPONSES

that our site has been singled out in terms of not being able to take advantage of Bonus FAR entitlements because of the proximity of a proposed park area. We would like our Residential FAR to remain at 12, and at the same time we would like to have the opportunity to achieve the maximum 3.0 bonus entitlements that would have to be achieved based on our design plan, in addition we would request from the CCDC that we would be entitled to Parks TDR keeping in mind and complying with the sun access height limit while designing our project.

Development in the downtown San Diego Core should be encouraged by allowing developers to develop projects that are economically viable as opposed to setting obstacles which would discourage high rise residential development projects. We believe that our development projects which we have envisioned exemplifies the purpose of the newly revised draft PDO. We can certainly work with certain sun access height restrictions while at the same time designing residential projects that would add to the diversity of the streetscape as well as a diverse and unique skyline.

Please provide us with your comments to our proposed changes to the Newly Revised Draft PDO as it affects both of the above noted development sites. If you would like to discuss this matter further, you are welcome to contact the undersigned at (714) 751-9020.

Yours truly,

Ghasem Ghods
Ghods Builders Inc.

c.c. Chris Foster, Joseph Wong Design Associates

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San Diego, California 92101-4454
Telephone (619) 234-0361
Fax (619) 234-4786

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OF COUNSEL
PAUL A. PETERSON

File No.
4895.041

September 12, 2005

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 12 2005

Orig. To: _____
Copy To: _____

Ms. Alexandra Elias, Senior Planner
CCDC
225 Broadway, Suite 1100
San Diego, CA 92101

Re: Draft Downtown Community Plan Update &
Draft Environmental Impact Report

Dear Alexandra:

We represent Ace Parking Management, Inc. with regard to the block bounded by 3rd
and 4th Avenues, Ash and Beech Streets.

28.1

Our client has significant concerns over the designation of park land concerning the
above referenced block. Our client has a current leasehold interest of 52,500 sq. ft. of the block
and is in escrow concerning 15,000 square feet of this leasehold interest.

Our client and the adjoining property owners are cooperating with each other and will be
advancing a development plan on the block and hope to have a project in front of CCDC within
the very near future. With the exception of the existing SRO, all of the remaining owners that
have an interest to develop the block including the Roman Catholic Bishop of San Diego
(Archdiocese), the Louise E. Foulks Trust (which our client is in escrow to buy), and Jim Hall of

28.1 As the letter raises no issues related to the adequacy of the EIR, no response
is necessary.

Ms. Alexandra Elias, Senior Planner
CCDC
September 12, 2005
Page 2

Hall/Fish Investments Inc. These three properties comprise of 45,000 square feet of the existing block and the owners are cooperating on a joint development plan.

Our client opposes the designation of this site as a park based upon the following factors:

1. A park on this particular block would eliminate a number of affordable SRO units (our client's proposed development would retain the existing SRO).
2. The park concept would significantly damage the property owners' value and long term investment based expectations.
3. A park on this particular block would impact several adjacent prime development blocks in terms of shade and shadow and other impacts.
4. This particular site does not appear to be favorable for a park especially in light of its close proximity to Balboa Park.
5. The plan also proposes to build an additional park bridge over I-5 with connections to Balboa Park making this particular block at 3rd and Ash even less desirable.
6. The concept of building a park on this block with current land values is cost prohibitive.

While our client recognizes there may be a perceived shortage of parks, we question the ability of the City to purchase the property and build a park. Once built, will the City have the resources to maintain not only this, but other parks that are planned within the Downtown area?

In March of 2005, we spoke with CCDC Staff who indicated that CCDC does not currently have the money or the resources to acquire the various designated park sites. Staff

Ms. Alexandra Elias, Senior Planner
CCDC
September 12, 2005
Page 3

indicated that the underlying floor area ratio and development intensities are still applicable to all blocks even if they have a park designation.

Finally, Staff indicated to us that if a project was presented to CCDC prior to the formal adoption of the Community Plan Update, it would be processed consistent with the current Land Use Plan (including floor area ratio and development intensities).

The purpose of this letter is to put CCDC on notice that our client opposes a park designation on its property and would hope that CCDC would consider removing the park designation from this particular block.

Sincerely,

PETERSON & PRICE
A Professional Corporation



Matthew A. Peterson

cc: Gary Papers, Manager, Architecture & Planning
John Baumgardner, CEO, Ace Parking Management, Inc.

L. Amy Sung, Ph.D.
6017 Firwood Row
La Jolla, CA 92037

Sept. 10, 2005

The Centre City Development Corp
225 Broadway, Suite 1100
San Diego, CA 92101-5005
Dear Sir/Madam,

The San Diego Union-Tribune, Saturday, Sept. 10, 2005 said that the improvement plan that increase traffic downtown, and that the 45-day period for submitting written comments on the draft report to the Centre City Development Corp. ends at 5 p.m. Monday.

I am a resident of La Jolla for many years. My family and friends have always thought that leaving the San Diego International Airport for down town is very easy. But it is very cumbersome to get to north interstate highway 5, which is the highway connecting all towns along the coast.

Currently all travelers including home coming residents going north have to go south on N Harbor Drive, dispersed into local streets through traffic lights, stop signs, making several turns around blocks, switching lanes within very short distance, and then finally merge with the 5N traffic.

These local maneuvers not only are stressful, waste all travelers' time and gas, and increase air and surface pollutions, but they also increased downtown traffic (unless the intension of such design is to lead all air travelers to wonder downtown for more business regardless they like or not). Without a direct smooth connection to a major highway going north is also a potentially great danger in the case of city emergency when large numbers of vehicles need to be evacuated into or out of the airport in very short time. (The south is very close to the border, not having much of the buffer capacity.)

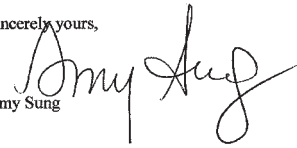
29.1



My suggestion is to make a ramp from N Harbor Drive (near the intersection with W Laurel St) to 5N (see attached map with the drawing), giving travelers easy options to go to 5N, Pacific Highway, or downtown.

This relatively simple construction will benefit all San Diegans and visitors, solve all the problems mentioned above, and make San Diego an even finer city to be.

Sincerely yours,


Amy Sung

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 12 2005

Orig. To: _____
Copy To: _____

29.1 Comment noted. Suggestions for improving airport access are included in the I-5 corridor study.

Yahoo! Maps - San Diego, CA 92101-5005

Page 1 of 1

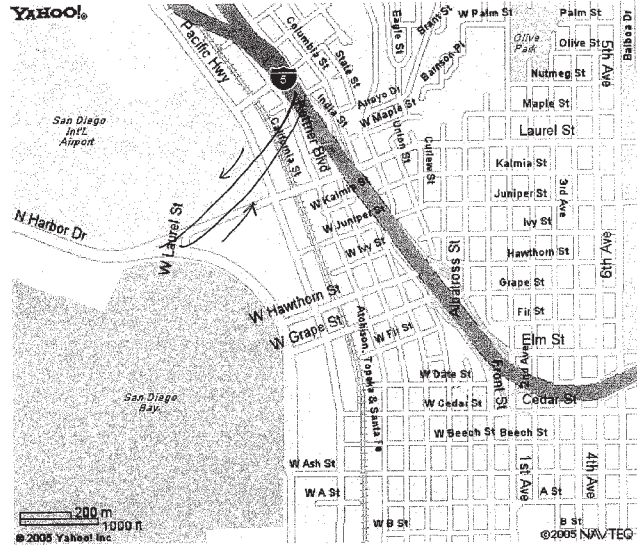
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★ 225 Broadway San Diego, CA 92101-5005



When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

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suggested by Amy Sung of San Diego

http://maps.yahoo.com/pmaps?name=&ed=P2rAoOp_0TqY8Zs1peNYRtmTSI83PkIeYZ... 9/10/2005

MITIGATION, MONITORING AND REPORTING PLAN

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
AIR QUALITY (AQ)				
<p>Impact AQ-B.1: Dust and construction equipment engine emissions generated during grading and demolition would impact local and regional air quality. (Direct and Cumulative)</p>	<p><i>Mitigation Measure AQ-B.1-1:</i> Prior to approval of a Grading or Demolition Permit, the City shall confirm that the following conditions have been applied, as appropriate:</p> <ol style="list-style-type: none"> 1. Exposed soil areas shall be watered twice per day. On windy days or when fugitive dust can be observed leaving the development site, additional applications of water shall be applied as necessary to prevent visible dust plumes from leaving the development site. When wind velocities are forecast to exceed 25 miles per hour, all ground disturbing activities shall be halted until winds that are forecast to abate below this threshold. 2. Dust suppression techniques shall be implemented including, but not limited to, the following: <ol style="list-style-type: none"> a. Portions of the construction site to remain inactive longer than a period of three months shall be seeded and watered until grass cover is grown or otherwise stabilized in a manner acceptable to the CCDC. b. On-site access points shall be paved as soon as feasible or watered periodically or otherwise stabilized. c. Material transported offsite shall be either sufficiently watered or securely covered to prevent excessive amounts of dust. d. The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times. 	<p>Prior to Demolition or Grading Permit (Design)</p>	<p>Developer</p>	<p>City</p>

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<ol style="list-style-type: none"> 3. Vehicles on the construction site shall travel at speeds less than 15 miles per hour. 4. Material stockpiles subject to wind erosion during construction activities, which will not be utilized within three days, shall be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer. 5. Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface. Any visible track-out extending for more than fifty (50) feet from the access point shall be swept or washed within thirty (30) minutes of deposition. 6. All diesel-powered vehicles and equipment shall be properly operated and maintained. 7. All diesel-powered vehicles and gasoline-powered equipment shall be turned off when not in use for more than five minutes, as required by state law. 8. The construction contractor shall utilize electric or natural gas-powered equipment in lieu of gasoline or diesel-powered engines, where feasible. 9. As much as possible, the construction contractor shall time the construction activities so as not to interfere with peak hour traffic. In order to minimize obstruction of through traffic lanes adjacent to the site, a flag-person shall be retained to maintain safety adjacent to existing roadways, if necessary. 10. The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew. 			

MITIGATION, MONITORING AND REPORTING PLAN

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San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<ol style="list-style-type: none"> 11. Low VOC coatings shall be used as required by SDAPCD Rule 67. Spray equipment with high transfer efficiency, such as the high volume-low pressure (HPLV) spray method, or manual coatings application such as paint brush hand roller, trowel, spatula, dauber, rag, or sponge, shall be used to reduce VOC emissions, where feasible. 12. If construction equipment powered by alternative fuel sources (LPG/CNG) is available at comparable cost, the developer shall specify that such equipment be used during all construction activities on the development site. 13. The developer shall require the use of particulate filters on diesel construction equipment if use of such filters is demonstrated to be cost-competitive for use on this development. 14. During demolition activities, safety measures as required by City/County/State for removal of toxic or hazardous materials shall be utilized. 15. Rubble piles shall be maintained in a damp state to minimize dust generation. 16. During finish work, low-VOC paints and efficient transfer systems shall be utilized, to the extent possible. 17. If alternative-fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible. 			

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
HISTORICAL RESOURCES (HIST)				
<p>Impact HIST-A.1: Future development in downtown could impact significant architectural structures. (Direct and Cumulative)</p>	<p><i>Mitigation Measure HIST-A.1-1:</i> For historic resources which are 45 years of age or older and which have not been evaluated for local, state and federal historic significance, CCDC shall consult with HRB to determine whether the resources is significant pursuant to CEQA.</p> <p>For resources that have been formally determined to be significant under federal, state or local criteria, the following actions shall be carried out under direction of CCDC in consultation with HRB, as appropriate.</p> <ul style="list-style-type: none"> • National Register-Listed/Eligible, California Register-Listed/Eligible Resources: Resources listed on or formally determined eligible for the National Register or California Register and structures identified as contributing structures within a National or California Register District, shall be retained onsite and any improvements, renovation, rehabilitation and/or adaptive reuse of the property shall ensure its preservation according to the Secretary of the Interior’s Standards for Rehabilitation of Historic Buildings and Guidelines for Rehabilitation of Historic Buildings. • San Diego Register-Listed Resources: Any development that proposes to remove or significantly alter one of these historical resources shall comply with Chapter 14, Article 3, Division 2 of the San Diego Municipal Code which regulates Historical Resources. 	<p>Prior to Development Permit (Design)</p> <p>Prior to Demolition, Grading, and/or Building Permit (Design)</p> <p>Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>CCDC/City</p>

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p><i>Mitigation Measure HIST-A.1-2:</i> If the potential exists for direct and/or indirect impacts to retained or relocated designated historical resources, the following measures shall be implemented.</p> <p>I. Prior to Permit Issuance</p> <p>A Construction Plan Check</p> <ol style="list-style-type: none"> 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for historical monitoring during demolition and/or stabilization have been noted on the appropriate construction documents. <ol style="list-style-type: none"> (a) Stabilization work can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits. (b) Physical description, including the year and type of structure, and extent of stabilization shall be noted on the plans. <p>B. Submittal of Treatment Plan for Retained Historic Resources</p> <ol style="list-style-type: none"> 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Applicant shall submit a Treatment Plan to CCDC for review and approval that includes measures for protecting any historic buildings and/or building components during construction related activities (e.g. removal 			

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>of non-historic features, demolition of adjacent structures, subsurface structural support, etc.). The Treatment Plan shall be shown as notes on all construction documents (i.e. Grading and/or Building Plans).</p> <p>C. Letters of Qualification have been submitted to CCDC</p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the historical monitoring program (i.e., Architectural Historian, Historic Architect and/or Historian), as defined in the City of San Diego Historical Resources Guidelines (HRG). 2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the historical monitoring of the project. 3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Documentation Program (DP)</p> <ol style="list-style-type: none"> 1. Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to CCDC for review and approval and shall include the following: <ol style="list-style-type: none"> (a) Photo Documentation <ol style="list-style-type: none"> (1) Documentation shall include professional quality photo documentation of the structure prior to 			

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.</p> <p>(2) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).</p> <p>(b) Required drawings</p> <p>(1) Measured drawings of the building’s exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.</p>			

MITIGATION, MONITORING AND REPORTING PLAN

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San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

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	<ul style="list-style-type: none"> (2) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s). 2. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved. B. PI Shall Attend Precon Meetings <ul style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical Monitoring program with the Construction Manager and/or Grading Contractor. <ul style="list-style-type: none"> (a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Historical Monitoring Plan (HMP) <ul style="list-style-type: none"> (a) Prior to the start of any work that requires monitoring, the PI shall submit a Historical Monitoring Plan which 			

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	<p>describes how the monitoring would be accomplished for approval by CCDC. The HMP shall include an Historical Monitoring Exhibit (HME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>(b) Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.</p> <p>(c) The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as underpinning, shoring and/or extensive excavation which could result in impacts to, and/or reduce impacts to the on-site or adjacent historic resource.</p> <p>C. Implementation of Approved Treatment Plan for Historic Resources</p> <ol style="list-style-type: none"> 1. Implementation of the approved Treatment Plan for the protection of Historic Resources within the project site may not begin prior to the completion of the Documentation Program as defined above. 2. The Historian and/or Architectural Historian shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historic resource to photo document the Treatment Plan process. 			

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	<ul style="list-style-type: none"> 3. The Historian and/or Architectural Historian shall document activity via the Consultant Site Visit Record (CSVSR). The CSVSR's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to CCDC. 4. Prior to the start of any construction related activities, the applicant shall provide verification to CCDC that all historic resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report. 5. CCDC will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed. D. Verification of approval of a Historical Commemorative Program (HCP), if applicable <ul style="list-style-type: none"> 1. The applicant shall submit documentation to CCDC for concurrent review and approval by HRB for a site-specific HCP, if mitigation for impacts to a designated resource is based on association with an important person, event or community history and the building would not be retained on-site. 2. CCDC shall provide a letter to the applicant approving or denying the proposal prior to the first preconstruction meeting 			

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	<p>and/or issuance of any construction permit. However, should CCDC grant conditional approval of the proposal, construction may be allowed to proceed, but the Certificate of Occupancy may not be issued until the historical commemorative program is approved.</p> <ol style="list-style-type: none"> 3. Prior to the issuance of any Certificate of Occupancy, the applicant shall provide verification to CCDC that the HCP has been implemented in accordance with the approved program. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of photo documentation or appropriate reporting program. 4. CCDC will provide written verification to the RE or BI after the site visit indicating that the Certificate of Occupancy can issued. <p>III. During Construction</p> <ol style="list-style-type: none"> A. Monitor Shall be Present During Grading/Excavation/Trenching <ol style="list-style-type: none"> 1. The monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to historical resources as identified on the HME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities. 2. The monitor shall document field activity via the Consultant Site Visit Record (CSVr). The CSVr's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), 			

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	<p>and in the case of ANY incidents involving the historical resource. The RE shall forward copies to CCDC.</p> <p>3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition arises which could effect the historical resource being retained on-site or adjacent to the construction site.</p> <p>B. Notification Process</p> <p>1. In the event of damage to a historical resource retained on-site or adjacent to the project site, the Historical Monitor shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI).</p> <p>2. The PI shall immediately notify CCDC by phone of the incident, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.</p> <p>C. Determination/Evaluation of Impacts to a Historical Resource</p> <p>1. The PI shall evaluate the incident relative to the historical resource.</p> <p>(a) The PI shall immediately notify CCDC by phone to discuss the incident and shall also submit a letter to CCDC indicating whether additional mitigation is required.</p>			

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	<p>(b) If impacts to the historical resource are significant, the PI shall submit a proposal for mitigation and obtain written approval from CCDC. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.</p> <p>(c) If impacts to the historical resource are not considered significant, the PI shall submit a letter to CCDC indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</p> <p>IV. Night Work</p> <p>A. If night work is included in the contract</p> <ol style="list-style-type: none"> 1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed. <ol style="list-style-type: none"> (a) No Impacts/Incidents In the event that no historical resources were impacted during night work, the PI shall record the information on the CSVR and submit to CCDC via fax by 9 am the following morning, if possible. (b) Potentially Significant Impacts If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed. 			

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	<p>(c) The PI shall immediately contact CCDC, or by 8 am the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night work becomes necessary during the course of construction</p> <ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify CCDC immediately. <p>C. All other procedures described above shall apply, as appropriate.</p> <p>V. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring, <ol style="list-style-type: none"> (a) The preconstruction Treatment Plan and Documentation Plan (photos and measured drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report. (b) The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the 			

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	<p>resource. Updated forms shall be submitted to the South Coastal Information Center with the Final Monitoring Report.</p> <ol style="list-style-type: none"> 2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to CCDC for approval. 4. CCDC shall provide written verification to the PI of the approved report. 5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Final Monitoring Report(s)</p> <ol style="list-style-type: none"> 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC. 			
	<p>Mitigation Measure HIST-A.1-3: If a Designated Local Register historical resource would be demolished, the following measure shall be implemented.</p> <p>I. Prior to Issuance of a Demolition Permit</p> <ol style="list-style-type: none"> A. A Documentation Program (DP) shall be submitted to CCDC for review and approval and shall include the following: <ol style="list-style-type: none"> 1. Photo Documentation <ol style="list-style-type: none"> (a) Documentation shall include professional quality photo 			

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	<p>documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.</p> <p>(b) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).</p> <p>2. Required drawings</p> <p>(a) Measured drawings of the building’s exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.</p> <p>(b) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South</p>			

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	<p>Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).</p> <p>B. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.</p> <p>C. In addition to the Documentation Program, the Applicant shall comply with any other conditions contained in the Site Development Permit, as approved through the City’s Historic Regulations contained in Chapter 14, Article 3, Division 2, which shall include but not be limited to one or more actions prepared and adopted by the HRB for demolition of the Local Register Resource.</p>			
<p>Impact HIST-B.1: Development in downtown could impact significant buried archaeological resources. (Direct and Cumulative)</p>	<p><i>Mitigation Measure HIST-B.1-1:</i> If the potential exists for archaeological resources, the following measures shall be implemented.</p> <p>I. Prior to Permit Issuance</p> <p>A. Construction Plan Check</p> <p>1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for Archaeological Monitoring and Native American monitoring, if applicable, have been noted on the appropriate construction documents.</p> <p>B. Letters of Qualification have been submitted to CCDC</p> <p>1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego</p>	<p>Prior to Demolition or Grading Permit (Design)</p> <p>Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>CCDC</p>

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	<p>Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</p> <ol style="list-style-type: none"> 2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project. 3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> 1. The PI shall provide verification to CCDC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to CCDC requesting a reduction to the 1/4 mile radius. <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Archaeologist shall 			

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	<p>attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>2. Archaeological Monitoring Plan (AMP)</p> <p>(a) Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Plan which describes how the monitoring would be accomplished for approval by CCDC. The AMP shall include an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>(b) The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>(c) Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.</p> <p>(d) The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded</p>			

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	<p>to bedrock, etc., which may reduce or increase the potential for resources to be present.</p> <p>III. During Construction</p> <p>A. Monitor Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> 1. The monitor shall be present full-time during soil remediation and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities. 2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to CCDC. 3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present. <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor 			

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	<p>is the PI) of the discovery.</p> <p>3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.</p> <p>C. Determination of Significance</p> <p>1. The PI and Native American representative, if applicable, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.</p> <p>(a) The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required.</p> <p>(b) If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.</p> <p>(c) If resource is not significant, the PI shall submit a letter to CCDC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</p> <p>IV. Discovery of Human Remains If human remains are discovered, work shall halt in that area and the following procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p>			

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	<ul style="list-style-type: none"> A. Notification <ul style="list-style-type: none"> 1. Archaeological Monitor shall notify the RE or BI as appropriate, CCDC, and the PI, if the Monitor is not qualified as a PI. 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. B. Isolate discovery site <ul style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains. 2. The Medical Examiner, in consultation with the PI, shall determine the need for a field examination to determine the provenience. 3. If a field examination is not warranted, the Medical Examiner shall determine with input from the PI, if the remains are or are most likely to be of Native American origin. C. If Human Remains are determined to be Native American <ul style="list-style-type: none"> 1. The Medical Examiner shall notify the Native American Heritage Commission (NAHC). By law, only the Medical Examiner can make this call. 2. The NAHC shall contact the PI within 24 hours or sooner, after Medical Examiner has completed coordination. 3. NAHC shall identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.. 4. The PI shall coordinate with the MLD for additional consultation. 5. Disposition of Native American Human Remains shall be 			

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	<p>determined between the MLD and the PI, if:</p> <ul style="list-style-type: none"> (a) The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 24 hours after being notified by the Commission; OR; (b) The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner. <p>D. If Human Remains are not Native American</p> <ul style="list-style-type: none"> 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with CCDC, the applicant/landowner and the Museum of Man. <p>V. Night Work</p> <ul style="list-style-type: none"> A. If night work is included in the contract <ul style="list-style-type: none"> 1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed. <ul style="list-style-type: none"> (a) No Discoveries In the event that no discoveries were encountered during night work, the PI shall record the information on the CSVR and submit to CCDC via fax by 9am the following morning, if possible. 			

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	<p>(b) Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.</p> <p>(c) Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night work becomes necessary during the course of construction</p> <ol style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify CCDC immediately. <p>C. All other procedures described above shall apply, as appropriate.</p> <p>VI. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring, <ol style="list-style-type: none"> (a) For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery 			

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	<p>Program shall be included in the Draft Monitoring Report.</p> <p>(b) Recording sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City’s Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> <ol style="list-style-type: none"> 2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to CCDC for approval. 4. CCDC shall provide written verification to the PI of the approved report. 5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Handling of Artifacts and Submittal of Collections Management Plan, if applicable</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 			

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	<ul style="list-style-type: none"> 3. The PI shall submit a Collections Management Plan to CCDC for review and approval for any project which results in a substantial collection of historical artifacts. C. Curation of artifacts: Accession Agreement and Acceptance Verification <ul style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with CCDC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC. D. Final Monitoring Report(s) <ul style="list-style-type: none"> 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution. 			

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SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
LAND USE (LND)				
Impact LU-B.1: Noise generated by major ballpark events could cause interior noise levels in noise-sensitive uses (e.g. residential and hotels) within four blocks of the ballpark to exceed the 45 dB(A) limit mandated by Title 24 of the California Code. (Direct)	Implementation of the noise attenuation measures required by Mitigation Measure NOI-B.2-1 would reduce interior noise levels to 45 dB (A) CNEL and reduce potential impacts to below a level of significance.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	CCDC/City
Impact LU-B.2: Noise generated by I-5 and highly traveled grid streets could cause noise levels in noise-sensitive uses not governed by Title 24 to exceed 45 dB(A). (Direct)	Mitigation Measures NOI-B.1-1 and NOI-C.1.1, as described below.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	CCDC/City
Impact LU-B.3: Noise levels in downtown areas within the 65 CNEL contour of SDIA could exceed 45 dB(A) for noise sensitive uses not covered by Title 24. (Direct)	Mitigation Measures NOI-B.1-1, as described below.	Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)	Developer	City/City

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<p>Impact LU-B.4: Noise generated by train horns, engines and wheels as well as bells at crossing gates would significantly disrupt sleep of residents along the railroad tracks. (Direct)</p>	<p><i>Mitigation Measure LU-B.4.1:</i> Prior to approval of a Building Permit which would expose habitable rooms to disruptive railroad noise, an acoustical analysis shall be performed. The analysis shall determine the expected exterior and interior noise levels related to railroad activity. As feasible, noise attenuation measures shall be identified which would reduce noise levels to 45 dB(A) CNEL or less in habitable rooms. Recommended measures shall be incorporated into building plans before approval of a Building Permit.</p>	<p>Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>City</p>
<p>Impact LU-B.5: Ballpark lighting would interrupt sleep in residences and hotels within two blocks of the ballpark. (Direct)</p>	<p><i>Mitigation Measure LU-B.5.1:</i> Prior to approval of a Building Permit which would result in a light sensitive use within a two-block radius of Petco Park, the applicant shall provide a lighting study that demonstrates to the satisfaction of CCDC that habitable rooms would be equipped with light attenuation measures which would allow occupants to reduce night-time light levels to 2.0 foot-candles or less.</p>	<p>Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>CCDC/City</p>

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NOISE (NOI)				
<p>Impact NOI-B.1: Noise generated by I-5 and highly traveled grid streets could cause interior noise levels in noise-sensitive uses (exclusive of residential and hotel uses) to exceed 45 dB(A). (Direct)</p>	<p><i>Mitigation Measure NOI-B.1-1:</i> Prior to approval of a Building Permit for any residential, hospital, or hotel within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.</p>	<p>Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>CCDC/City</p>
<p>Impact NOI-B.2: Noise generated by major ballpark events could cause interior noise levels in noise-sensitive uses (e.g. residential and hotels) within four blocks of the ballpark to exceed the 45 dB(A) limit mandated by Title 24 of the California Code. (Direct)</p>	<p><i>Mitigation Measure NOI-B.2-1:</i> Prior to approval of a Building Permit for any noise-sensitive land uses within four blocks of Petco Park, an acoustical analysis shall be performed. The analysis shall confirm that architectural or other design features are included in the design which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.</p>	<p>Prior to Building Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>City</p>
<p>Impact NOI-C.1: Exterior required outdoor open space in residential could experience traffic noise levels in excess 65 dB(A) CNEL. (Direct)</p>	<p><i>Mitigation Measure NOI-C.1-1:</i> Prior to approval of a Development Permit for any residential development within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any required outdoor open space areas would be exposed to noise levels in excess of 65 dB(A) CNEL. Provided noise attenuation would not interfere with the primary purpose or design intent of the exterior use, measures shall be included in building plan, to the extent feasible.</p>	<p>Prior to Development Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>City</p>

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<p>Impact NOI-D.1: Recreation areas within public parks and plazas may experience traffic noise levels in excess 65 dB(A) CNEL. (Direct)</p>	<p><i>Mitigation Measure NOI-D.1-1:</i> Prior to approval of a Development Permit for any public park or plaza within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any recreation areas would be exposed to noise levels in excess of 65 dB(A) CNEL. Provided noise attenuation would not interfere with the intended recreational use or park design intent, measures shall be included, to the extent feasible.</p>	<p>Prior to Development Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>CCDC/Developer</p>	<p>City</p>
PALEONTOLOGICAL RESOURCES (PAL)				
<p>Impact PAL-A.1: Excavation in geologic formations with a moderate to high potential for paleontological resources could have an significant impact on these resources, if present. (Direct)</p>	<p><i>Mitigation Measure PAL-A.1-1:</i> In the event the Secondary Study indicates the potential for significant paleontological resources, the following measures shall be implemented as determined appropriate by CCDC.</p> <p>I. Prior to Permit Issuance</p> <p>A. Construction Plan Check</p> <ol style="list-style-type: none"> 1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, Centre City Development Corporation (CCDC) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents. <p>B. Letters of Qualification have been submitted to CCDC</p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology 	<p>Prior to Demolition, Grading or Building Permit (Design) Prior to Certificate of Occupancy (Implementation)</p>	<p>Developer</p>	<p>CCDC/City</p>

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	<p>Guidelines.</p> <ol style="list-style-type: none"> 2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project. 3. Prior to the start of work, the applicant shall obtain approval from CCDC for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> 1. The PI shall provide verification to CCDC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor. 			

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	<ul style="list-style-type: none"> a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored <ul style="list-style-type: none"> a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation). 3. When Monitoring Will Occur <ul style="list-style-type: none"> a. Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur. b. The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present. <p>III. During Construction</p> <ul style="list-style-type: none"> A. Monitor Shall be Present During Grading/Excavation/Trenching <ul style="list-style-type: none"> 1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME 			

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	<p>that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.</p> <ol style="list-style-type: none"> 2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of any discoveries. The RE shall forward copies to CCDC. 3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present. <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible. <p>C. Determination of Significance</p> <ol style="list-style-type: none"> 1. The PI shall evaluate the significance of the resource. <ol style="list-style-type: none"> a. The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to 			

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	<p>CCDC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.</p> <ul style="list-style-type: none"> b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to CCDC unless a significant resource is encountered. d. The PI shall submit a letter to CCDC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required. <p>IV. Night Work</p> <ul style="list-style-type: none"> A. If night work is included in the contract <ul style="list-style-type: none"> 1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 2. The following procedures shall be followed. <ul style="list-style-type: none"> a. No Discoveries <ul style="list-style-type: none"> (1) In the event that no discoveries were encountered during night work, The PI shall record the information on the CSV and submit to CCDC via fax by 9am the following morning, if possible. 			

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	<ul style="list-style-type: none"> b. Discoveries <ul style="list-style-type: none"> (1) All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction. c. Potentially Significant Discoveries <ul style="list-style-type: none"> (1) If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed. d. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made. <p>B. If night work becomes necessary during the course of construction</p> <ul style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify CCDC immediately. <p>C. All other procedures described above shall apply, as appropriate.</p> <p>VI. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ul style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring, <ul style="list-style-type: none"> a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with the San Diego Natural History Museum 			

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	<p>(1) The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City’s Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.</p> <p>2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</p> <p>3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.</p> <p>4. CCDC shall provide written verification to the PI of the approved report.</p> <p>5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</p> <p>B. Handling of Fossil Remains</p> <p>1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.</p> <p>2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate</p> <p>C. Curation of fossil remains: Deed of Gift and Acceptance Verification</p> <p>1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.</p> <p>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.</p>			

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	<p>D. Final Monitoring Report(s)</p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Final Monitoring Report to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution. 			
TRAFFIC AND CIRCULATION (TRF)				
<p>Impact TRF-A.1.1: Increased traffic on grid streets from downtown development would result in unacceptable levels of service on specific roadway intersections and/or segments within downtown. (Direct)</p>	<p><i>Mitigation Measure TRF-A.1.1-I:</i> At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall conduct a downtown-wide evaluation of the ability of the grid street system to accommodate traffic within downtown as well as the following roadway segment in the surrounding neighborhood: Imperial Avenue (between 25th Street and of 28th Street). In addition to identifying roadway intersections or segments which may need immediate attention, the evaluation shall identify roadways which may warrant interim observation prior to the next 5-year evaluation. The need for roadway improvements shall be based upon deterioration to Level of Service F and/or other standards established by CCDC, in cooperation with the City Engineer. In completing these studies, the potential improvements identified in Appendix C of the traffic study and Tables 5.2-20 and 21 of the EIR will be reviewed to determine whether these or other actions are required to improve traffic flow along affected roadway corridors. As necessary, potential improvements shall also be determined for the identified roadway segments within the surrounding neighborhoods. In selecting improvements, CCDC shall review the effect the improvement may have on pedestrian or bicycle activities whenever pedestrians must traverse any of the following roadway conditions:</p>	<p>Every five years</p>	<p>CCDC/City</p>	<p>CCDC/City</p>

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	<ul style="list-style-type: none"> • Five or more lanes at any intersection (excepting boulevards); • Three or more travel lanes on residential streets, or crossing roadways with four or more lanes; • Four or more travel lanes on multi-function streets, or crossing roadways with four or more travel lanes; or • Dual right-turn lanes. <p>Following the completion of each five-year monitoring event, CCDC shall incorporate needed roadway improvements into its Capital Improvement Program (CIP) or identify another implementation strategy.</p> <p>In order to determine if the roadway improvements included in the current five-year CIP, or the equivalent, are sufficient to accommodate developments, a traffic study would be required for large projects. The threshold to be used for determining the need for a traffic study shall reflect the traffic volume threshold used in the Congestion Management Program (CMP). The CMP stipulates that any activity forecasted to generate 2,400 or more daily trips (200 or more equivalent peak hour trips).</p>			
	<p>Mitigation Measure TRF-A.1.1-2: Prior to approval of any development which would generate a sufficient number of trips to qualify as a large project under the Congestion Management Program (i.e. more than 2,400 daily trips, or 200 trips during a peak hour period), a traffic study shall be completed as part of the Secondary Study process. The traffic study shall be prepared in accordance with City’s Traffic Impact Study Manual. If the traffic study indicates that roadways substantially affected by the project would operate at LOS F with the addition of project traffic, the traffic study shall identify improvements to grid street segments and/or intersections which would be required within the next five years to achieve an acceptable</p>	<p>Prior to Development Permit (Design)</p>	<p>Developer</p>	<p>CCDC/City</p>

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	<p>LOS or reduce congestion, to the extent feasible. If the needed improvements are already included in CCDC’s CIP, or the equivalent, no further action shall be required. If the any of the required improvements are not included in the CIP, or not expected within five years of project completion, CCDC shall amend the CIP, within one year of project approval, to include the required improvements and assure that they will be implemented within five years of project completion. At CCDC’s discretion, the developer may be assessed a pro-rated share of the cost of improvements.</p>			
	<p>Mitigation Measure TRF-A.1.1-3: Upon adoption of the Community Plan, CCDC and the City shall update the Centre City Public Facilities Financing Plan (PFFP) to include a transportation element to be completed within six (6) months. The update to the Centre City PFFP required by this mitigation measure shall include the following:</p> <ul style="list-style-type: none"> a) The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities; b) The PFFP update will specify transportation improvements as identified on Figure 7.2 of the Community Plan and further described on Table 5.2-21 and Figure 5.2-8 of this FEIR; c) The PFFP update will specifically include capital improvements to the downtown transit network as identified on page 7-10 and Figure 7-4 of the Community Plan and further described in Table 5.2-22 of this FEIR; d) For this mitigation measure, the PFFP update will not include freeway improvements, freeway ramps and will not now or in the future include 	<p>Upon Plan Adoption</p>	<p>CCDC/City</p>	<p>CCDC/City</p>

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	<p>transit operation or maintenance improvements as these are specifically prohibited in Government Code 66000, which are addressed in Mitigation Measure TRF-A.2.1-2 below;</p> <p>e) The PFFP update will set forth a timeline and other agreed-upon relevant criteria for implementation of each improvement identified in items (b) and (c) above;</p> <p>f) The PFFP update will identify the total estimated costs for each improvement in items (b) and (c) above as provided for by CCDC and reviewed and confirmed by the City’s Transportation Planning and Facilities Financing Section of the Planning Department;</p> <p>g) The PFFP update will include the establishment of a fair-share contribution from downtown development for improvement in items b) and c) above, through a Developer Impact Fee or secure, local alternative funding sources, in a manner that will comply with applicable law;</p> <p>h) Prior to adoption by the City of San Diego Council, the PFFP will be sent to the Entities for their review and comment;</p> <p>i) CCDC and the Facilities Financing Section of the Planning Department shall seek adoption of the PFFP update at a public hearing before the San Diego City Council within six months after adoption of the Community Plan Update. As extension not to exceed three (3) months shall be granted upon mutual consent of the Entities.</p> <p>The failure or refusal of any Entity other than CCDC or the City, to cooperate in the implementation of this mitigation measure, shall not constitute a failure of CCDC or the City to implement this mitigation</p>			

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	measure; however, the City and CCDC shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.			
Impact TRF-A.1.2: Increased traffic from downtown development on certain streets surrounding downtown would result in an unacceptable level of service. (Direct and Cumulative)	Implementation of Mitigation Measure TRF-A.1.1-1 would also reduce impacts on surrounding roadways but not necessarily below a level of significance.	Every five years	CCDC/City	CCDC/City
Impact TRF-A.2.1: Additional traffic on freeway segments and ramps serving downtown associated with future downtown development would result in unacceptable delays and level of service. (Direct and Cumulative)	<p><i>Mitigation Measure TRF-A.2.1-1:</i> Upon adoption of the Community Plan, CCDC shall initiate a multi-jurisdictional effort to develop a detailed, enforceable plan [the Plan] that will identify transportation improvements that would reduce congestion on I-5 through downtown, as well as identify funding sources including federal, state, regional and local funding and which may also include fair share contributions by development as well as other mechanisms based on a nexus study. The process and Plan required by this mitigation measure shall include the following.</p> <ul style="list-style-type: none"> a) The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, Caltrans, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities. b) The Plan will specifically identify physical and operational improvements to I-5, other freeways, relevant arterial roads and transit facilities [the Improvements], that are focused on specific transportation impacts created by downtown development, and will also identify the specific responsibilities of each Entity for the construction, maintenance 	Upon Plan Adoption	CCDC	CCDC/City

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SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>and financing for each Improvement. The Plan may also identify other improvements necessary to address regional transportation needs, but for purposes of this mitigation measure, the Improvements included in the Plan need only be designed to mitigate the impacts created by downtown development.</p> <p>c) The Plan will set forth a timeline and other agreed-upon relevant criteria for implementation of each Improvement.</p> <p>d) The Plan will identify the total estimated costs for each such Improvement, including construction, maintenance and operational costs [the Total Costs], and the responsibility of each Entity for both implementation and funding for such Total Costs.</p> <p>e) The Plan will include the parameters for any fair-share or development impact fee programs (or the like) to be implemented, that would require private and/or public developers to contribute to the Total Costs, in a manner that will comply with applicable law.</p> <p>f) In developing the Plan, the Entities shall also consider ways in which the Improvements can be coordinated with existing local and regional transportation and facilities financing plans and programs, in order to avoid duplication of effort and expenditure; however, the existence of such other plans and programs shall not relieve the Entities of their collective obligation to develop and implement the Plan as set forth in this mitigation measure. Nothing in the Plan shall be construed as relieving any Entity (or any other entity) from its independent responsibility (if any) for the planning, funding, construction, maintenance or operation of any transportation improvement.</p>			

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>g) Upon adoption of the Plan by the City Council, SANDAG, MTS and Caltrans will also seek endorsement of same through their government structures.</p> <p>h) CCDC shall seek adoption of the Plan at a public hearing before the City Council within one year of the initiation of the multi-jurisdictional effort to develop the Plan. CCDC shall report in writing, and at a public hearing before the City Council and SANDAG (if SANDAG agrees to place such a report on its agenda), regarding the progress made to develop the Plan, within six months of the first meeting of the entities. Thereafter, CCDC shall report to the City Council at least annually regarding the progress of the Plan, for a period of not less than five years, which may be extended at the request of the City Council.</p> <p>i) The Plan shall also expressly include each Entity’s pledge that it will cooperate with CCDC in making the required reports to the Agency, including the presence and participation of a responsible representative of the Entity at all public hearings called for the purpose of reviewing the progress of development and implementation of the Plan.</p> <p>j) The PFFP shall be amended to include any projects in the Plan that CCDC and the City Council determine are appropriate for inclusion in the PFFP. The amendment to the PFFP to accommodate such appropriate improvements shall be processed for adoption at the time the Plan is submitted for adoption to the City Council.</p> <p>The failure or refusal of any Entity other than CCDC or the City to cooperate in the implementation of this mitigation measure shall not constitute a failure of CCDC or the City to implement this mitigation measure; however, the CCDC and City shall each use its best efforts to obtain the cooperation of all</p>			

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
	<p>responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.</p> <p>Further, if the City Council or Redevelopment Agency finds that (1) any of the Entities fails or has failed to cooperate in the development or implementation of this Plan, or (2) there is insufficient funding for implementation of the improvements in accord with the Plan, or (3) development downtown has significantly outpaced the development of infrastructure needed to support the development, the Council/Agency shall thereafter review the status of the Plan and its improvements, to determine whether substantial evidence shows that any of the conditions listed in Public Resources Code section 21166 and Guidelines section 15162 exist, so that additional environmental documentation would be required. In any event, the annual progress report delivered by CCDC pursuant to this mitigation measure shall include an evaluation of whether any of these conditions exist.</p>			
<p>Impact TRF-A.2.2: Elimination of Cedar St. off-ramp would impact other freeway ramps by redirecting traffic to other offramps serving downtown. (Direct)</p>	<p><i>Mitigation Measure TRF A.2.2-1:</i> Prior to elimination of the Cedar Street off-ramp from I-5, a traffic study shall be done by CCDC in consultation with the City of San Diego and Caltrans to determine the potential effects associated with elimination of the off-ramp and the conversion of Cedar Street from one- to two-way. The report shall also identify roadway modifications that would minimize potential impacts on local surface streets and I-5.</p>	<p>Prior to elimination of Cedar Street offramp (Design/Implementation)</p>	<p>CCDC/City</p>	<p>CCDC/City</p>

MITIGATION, MONITORING AND REPORTING PLAN

for the

San Diego Downtown Community Plan, Centre City Planned District Ordinance, and the 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project

SIGNIFICANT IMPACT(S)	MITIGATION MEASURE(S)	IMPLEMENTATION TIME FRAME	IMPLEMENTATION RESPONSIBILITY	VERIFICATION RESPONSIBILITY
<p>Impact TRF-D.1: Parking demand would exceed the supply generated by proposed parking requirements which could increase parking demand in areas surrounding downtown. (Direct and Cumulative)</p>	<p><i>Mitigation Measure TRF-D.1-1:</i> At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall evaluate the parking supply and demand within the downtown area as well as assess the amount of parking generated by downtown development in residential areas within a quarter-mile radius of downtown. The evaluations will include an inventory of the number of public and private parking spaces available for public parking within downtown and the residential neighborhoods within a quarter-mile radius of downtown. The evaluation shall determine the current as well as anticipated parking supply and demand during the ensuing five-year period. Based on the evaluation, CCDC shall determine if the discrepancy between demand and supply warrant ameliorative actions which may include but not be limited to: (1) constructing new public parking, (2) implementing specific shared parking programs with private parking facilities, (3) implementing parking meter programs that respond to changes in the parking demand which occur during a 24-hour period and/or (4) <u>implementing residential permit parking programs</u>. Any actions identified during the parking evaluation shall be incorporated into CCDC's Capital Improvement Program, if appropriate, or carried out through some other form of enforcement such as amending Planned District Ordinances or other regulatory programs dealing with parking.</p>	<p>Every five years</p>	<p>CCDC/City</p>	<p>CCDC/City</p>

FINDINGS AND OVERRIDING CONSIDERATIONS

**CANDIDATE FINDINGS OF FACT
FOR THE
CITY COUNCIL OF THE CITY OF SAN DIEGO AND
THE REDEVELOPMENT AGENCY OF THE CITY OF SAN DIEGO
CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE PROPOSED
SAN DIEGO DOWNTOWN COMMUNITY PLAN, CENTRE CITY PLANNED
DISTRICT ORDINANCE AND THE 10th AMENDMENT TO THE
REDEVELOPMENT PLAN FOR THE CENTRE CITY REDEVELOPMENT PROJECT**

I. INTRODUCTION

The following Findings of Fact (“Findings”) are made relative to the conclusions of the Final Environmental Impact Report (“FEIR”) for the proposed Centre City Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Redevelopment Project. The FEIR, which is incorporated by reference as if fully set forth herein, identifies significant or potentially significant environmental impacts which may occur as a result of the adoption of the San Diego Downtown Community Plan, the Centre City Planned District Ordinance, and the Redevelopment Plan for the Centre City Project Area (“Proposed Plans and Ordinance”). Thus, in accordance with the provisions of the California Environmental Quality Act, CEQA Sections 21000-21177 (“CEQA”), the State CEQA Guidelines, 14 Cal. Code Regs Sections 15000-15387, and the Procedures for Implementation of the California Environmental Quality Act and the State CEQA Guidelines of the Redevelopment Agency of the City of San Diego (June 1990) (“Agency Local CEQA Guidelines”), the Redevelopment Agency of the City of San Diego (“Agency”) and the City Council of the City of San Diego (“Council”) (collectively referred to herein as “Council/Agency”) hereby adopt these Findings.

The State CEQA Guidelines also require that the Council/Agency balance the benefits of the Proposed Plans and Ordinance against the unavoidable environmental risks in determining whether to approve the Proposed Plans and Ordinance (14 Cal. Code Regs. Section 15093(a)). The Council/Agency has carefully considered the benefits of the Proposed Plans and Ordinance. The FEIR identifies significant environmental effects which will not be mitigated to below a level of significance and which will be allowed to occur as a result of approval of the Proposed Plans and Ordinance. Therefore, the Council/Agency hereby adopts the Statement of Overriding Considerations accompanying this document, which states the specific reasons why the benefits of the Proposed Plans and Ordinance, each of which standing alone, is sufficient to support approval of the Proposed Plans and Ordinance, outweigh the unavoidable adverse environmental effects of the Proposed Plans and Ordinance, and explains that the unavoidable environmental effects are considered acceptable.

A. DESCRIPTION OF PROPOSED PLANS AND ORDINANCE

The proposed Downtown Community Plan would establish the overall vision for downtown and outline policies to attain this vision. The Downtown Community Plan would also serve as the basis for detailed zoning and development standards as well as a variety of other actions, such as open space acquisitions and transportation improvements. Under the proposed Downtown

Community Plan, downtown at buildout would consist of an integrated and connected network of distinct neighborhoods and districts, as described in Section 4.5.2.4 of the FEIR. Several of the neighborhoods, including Little Italy, Marina and the Gaslamp Quarter, are not expected to change significantly as a result of the Downtown Community Plan. Other areas, particularly East Village, would undergo major transformations to accommodate increasing residential and commercial activity.

The proposed Downtown Community Plan would depart from the existing 1992 Centre City Community Plan by further increasing intensity and density of land uses and increasing resident and employment populations. In addition, the proposed Plan would provide more park space, orient downtown's neighborhoods around mixed-use centers and connect neighborhoods through boulevards, green streets, and freeway lids.

The Centre City Planned District Ordinance would be amended to implement the proposed Downtown Community Plan. The Redevelopment Plan would be amended to make it consistent with the new Downtown Community Plan.

B. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings and Statement of Overriding Considerations, the Record of Proceedings for the Proposed Plans and Ordinance consists of the following documents and other evidence, at a minimum:

- The Notice of Preparation and all other public notices issued by the Council/Agency in conjunction with the Proposed Plans and Ordinance;
- The Draft FEIR;
- The FEIR;
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft FEIR;
- All written and verbal public testimony presented during a noticed public hearing for the Proposed Plans and Ordinance at which such testimony was taken;
- The Mitigation Monitoring and Reporting Program ("MMRP");
- The reports included in Volumes 2 and 3 of the FEIR;
- The Ordinances and Resolutions adopted by the Council/Agency in connection with the Proposed Plans and Ordinance, and all documents incorporated by reference therein;
- Matters of common knowledge to the Council/Agency, including but not limited to federal, state and local laws and regulations;

- Any documents expressly cited in these Findings and Statement of Overriding Considerations; and
- Any other materials required to be in the record of proceedings by Section 21167.6(e) of CEQA.

The documents and other materials that constitute the record of proceedings upon which the Council/Agency's decision are based are located at the City of San Diego ("City"), 202 C Street, San Diego, CA 92101, and at the Centre City Development Corporation ("CCDC"), 225 Broadway, Suite 1100, San Diego, CA 92101. Copies of all these documents, which constitute the record of proceedings, are and at all relevant times have been available upon request at the offices of the Council/Agency at the above addresses. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and 14 Cal. Code Regs § 15091(e).

The Council/Agency has relied on all the documents listed above in reaching its decision on the Proposed Plans and Ordinance, even if every document was not formally presented to the Council/Agency or Council/Agency staff as part of the Council/Agency files generated in connection with the Proposed Plans and Ordinance. These documents are either in the Proposed Plans and Ordinance files, reflect prior planning or legislative decisions of which the City Council was aware in approving the Proposed Plans and Ordinance, or influenced the expert advice provided to the Council/Agency staff or consultants, who then provided advice to Council/Agency. For that reason, these documents form part of the underlying factual basis for the Council/Agency's decisions relating to the adoption of the Proposed Plans and Ordinance.

II. GENERAL FINDINGS

The Council/Agency hereby finds as follows:

- The foregoing statements are true and correct;
- The FEIR was completed in compliance with CEQA;
- The FEIR reflects the Council/Agency's independent judgment;
- An MMRP has been prepared for the changes to the Proposed Plans and Ordinance, which the Council/Agency has adopted or made a condition of approval of the Proposed Plans and Ordinance. That MMRP has been incorporated herein by reference and is considered part of the record of proceedings for the Proposed Plans and Ordinance;
- The MMRP designates responsibility and anticipated timing for the implementation of mitigation;
- In determining whether the Proposed Plans and Ordinance have a significant impact on the environment, and in adopting Findings pursuant to Section 21081 of CEQA, the Council/Agency has complied with CEQA Sections 21081.5 and 21082.2;

- The impacts of the Proposed Plans and Ordinance have been analyzed to the extent feasible at the time of certification of the FEIR;
- The Council/Agency has made no decisions related to approval of the Proposed Plans and Ordinance prior to certification of the FEIR, nor has the Council/Agency previously committed to a definite course of action with respect to the Proposed Plans and Ordinance; and
- Copies of all the documents incorporated by reference in the FEIR are and have been available upon request at all times at the offices of the City Clerk or CCDC, custodians of record for such documents or other materials.

III. SUMMARY REGARDING IMPACTS

The FEIR concludes that implementation of the Proposed Plans and Ordinance would have significant direct impacts related to land use/planning; transportation, circulation, access and parking; cultural resources; aesthetics/visual quality; noise; air quality; and paleontological resources. Certain identified direct impacts to land use/planning; noise; air quality; and paleontological resources would be mitigated to below a level of significance by adoption of the identified mitigation measures. Identified direct impacts to land use/planning; transportation, circulation, access and parking; cultural resources; aesthetics/visual quality; and noise were found to be significant and not mitigated to below a level of significance. Direct impacts to public facilities and services; geology; hydrology/water quality; hazardous materials; population/housing; and energy were found not to be significant.

Cumulative impacts to energy; geology and seismicity; hazardous materials; land use policy conformance; paleontological resources, population/housing; visual quality; and public facilities and services were found not to be significant. Cumulative impacts to air quality; cultural resources; hydrology/water quality; land use/planning; noise; and traffic/circulation/parking would be significant and not mitigated to below a level of significance.

IV. FINDINGS REGARDING DIRECT IMPACTS

The Council/Agency, having independently reviewed and considered the information contained in the FEIR for the Proposed Plans and Ordinance, the appendices and the record of proceedings, finds pursuant to CEQA, the State CEQA guidelines, and the Agency Local CEQA Guidelines that conditions, changes or alterations have been required in or incorporated into the Proposed Plans and Ordinance which avoid or substantially reduce certain significant direct environmental impacts. For these, the impact is considered significant but mitigated. However, for other significant impacts, these conditions, changes or alterations would not be sufficient to reduce significant direct impacts to below a level of significance. For those significant direct impacts which are considered to be significant and not mitigated, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411. For the unmitigated impacts, findings are made that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific

economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that unmitigated impacts are acceptable because of specific overriding considerations.

A. LAND USE COMPATIBILITY (LU-B)

Impact LU-B1 (Ballpark Noise):

Noise sensitive uses could be significantly impacted by entertainment activities associated with the ballpark. According to the Ballpark FEIR (CCDC 1999), the area within four blocks of the ballpark could be significantly impacted by crowd noise and fireworks associated with the ballpark. As such, ballpark noise impacts would be limited to future development within East Village within this four-block radius.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR to below a level of significance. Thus, the impacts are considered **significant but mitigated**.

Facts in Support of Finding: Noise-sensitive uses that could be significantly impacted by ballpark noise have already been identified in the Ballpark FEIR (see FEIR, page 5.7-6), which also concluded that noise attenuation measures would be required to mitigate this impact to below a level of significance. By requiring an acoustical analysis to identify any new such sensitive uses, before issuance of the building permit, the FEIR assures that the appropriate noise attenuation measures are implemented to mitigate the impacts of ballpark noise to acceptable levels.

Mitigation Measures: Mitigation Measure NOI-B.2-1, which is set forth below, is feasible and made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure NOI-B.2-1: Prior to approval of a Building Permit for any noise-sensitive land uses within four blocks of Petco Park, an acoustical analysis shall be performed. The analysis shall confirm that architectural or other design features are included in the design which would assure that noise levels within habitable rooms would not exceed 45 dB (A) CNEL.

Impact LU-B2 (Traffic Noise):

Residential uses located adjacent to high volume grid streets and freeways would experience excessive levels of noise, resulting in a significant land use compatibility impact. As discussed in Section 5.7 of the FEIR, traffic noise from I-5 would exceed acceptable exterior levels within a minimum of 475 feet. In addition, any grid street which would carry more than 7,000 average

daily trips would expose future noise-sensitive uses to unacceptable exterior noise levels. Freeway noise impacts would adversely impact noise sensitive uses within Little Italy, Cortez, and East Village. Noise from high volume grid streets would occur throughout all of the neighborhoods.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all traffic-related noise impacts to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The FEIR sets forth specific criteria for identifying potentially impacted land uses, and requires an acoustical study before a building permit is issued to determine appropriate and effective mitigation measures that would be incorporated into any new project. Through the implementation of Mitigation Measure NOI-B.1-1, interior noise levels for such projects would thereby be reduced to below a level of significance. However, given the proximity of the freeway and major streets to many of the new projects, there may be no noise attenuation measures that can sufficiently reduce traffic noise impacts on exterior spaces within the identified impact areas.

Mitigation Measures: Mitigation Measure NOI-B.1-1, which is set forth below, is feasible and made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure NOI-B.1-1: Prior to approval of a Building Permit for any residential, hospital, or hotel within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.

Impact LU-B3 (Aircraft Noise):

Noise sensitive uses within the 65 dB(A) CNEL contour of the San Diego International Airport would be significantly impacted by aircraft noise. Aircraft noise would interfere with a number of common activities including television viewing, conversations and sleeping. Aircraft noise would impact the northerly portions of Little Italy and Cortez.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all aircraft-related noise impacts to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Applicable provisions of state law, including Title 21 and Title 24 of the California Administrative Code would require the completion of noise studies and implementation of appropriate noise attenuation that would reduce interior noise levels in new development to within acceptable limits.

Mitigation Measures: No noise attenuation measures are available to reduce the exterior impacts of aircraft noise levels to within acceptable limits.

Impact LU-B4 (Railroad Noise):

Noise generated by railroad activity would significantly impact noise sensitive uses located nearby. Railroad noise sources include engine, horn and wheel noise as well as crossing bells along the main tracks as well as within the rail yards. Railroad noise would disturb sleep patterns of persons living nearby to the railroad tracks. Railroad noise impacts would be expected to occur in the following districts: Little Italy, Columbia, Marina, East Village and Convention Center.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all railroad noise impacts to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The Downtown Community Plan would include a policy which would seek establishment of quiet zones and enforce a ban on the sounding of horns, pursuant to federal regulations promulgated by the Federal Railroad Administration (Policy 13.4-P-2). However, implementation of this policy will require improvements to downtown highway-rail crossings, which in turn requires the cooperation of the California Public Utilities Commission and the rail operators. Moreover, the federal regulations do not provide for any means to restrict the sounding of railroad crossing bells. While the other noise attenuation measures required by the FEIR, plus the establishment of a quiet zone through downtown, would reduce the impact of railroad noise, they cannot silence the crossing bells and other associated railroad operation noise.

Mitigation Measures: Mitigation Measure LU-B.4-1, which is set forth below, is feasible and made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure LU-B.4-1: Prior to approval of a Building Permit which would expose habitable rooms to disruptive railroad noise, an acoustical analysis shall be performed. The analysis shall determine the expected exterior and interior noise levels related to railroad activity. As feasible, noise attenuation measures shall be identified which would reduce noise levels to 45 dB(A) CNEL or less in habitable rooms. Recommended measures shall be incorporated into building plans before approval of a Building Permit.

Impact LU-B5 (Ballpark Lighting):

According to the Ballpark FEIR, field lighting associated with the ballpark could significantly impact sleep patterns within a two-block radius. Ambient night-time lighting levels in the area are generally less than 2.0 foot-candles. According to the Ballpark EIR, field lighting could cause light levels to exceed the ambient condition within a two-block radius. Light-sensitive activities (e.g. sleep) could be adversely impacted by light in excess of ambient levels. Ballpark lighting impacts would be limited to East Village within the immediate area of the ballpark.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR to below a level of significance. Thus, the impacts are considered **significant but mitigated**.

Facts in Support of Finding: As with the ballpark-related noise impacts, the impacts associated with the lighting generated by the ballpark were identified, and appropriate mitigation measures have been required by the Ballpark FEIR. By requiring that any new development equip habitable rooms with appropriate and sufficient light attenuation measures, the FEIR assures that impacts of ballpark-related light impacts would be reduced to below a level of significance.

Mitigation Measures: Mitigation Measure LU-B.5-1, set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure LU-B.5-1: Prior to approval of a Development Permit which would result in a light sensitive use within a two-block radius of Petco Park, the applicant shall provide a lighting study that demonstrates to the satisfaction of CCDC that habitable rooms would be equipped with light attenuation measures which would allow occupants to reduce night-time light levels to 2.0 foot-candles or less.

Impact LU-B6 (Transient Impacts):

Increased development activity could have a significant land use compatibility impact on surrounding neighborhoods by encouraging transients in downtown to relocate into surrounding neighborhoods. Development within the downtown area could discourage transient activities because the areas would be active around the clock. Seeking more isolation, the transient population could move into the surrounding neighborhoods. The construction of proposed freeway lids could also affect dispersal of the transient population by making it easier to cross I-5 as well as providing open areas. Areas most susceptible to increased transient activities would be undeveloped canyons in residential neighborhoods within Uptown, Golden Hill, Sherman Heights and Barrio Logan, park land within Balboa Park, and vacant buildings and existing industrial areas within Barrio Logan.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all impacts associated with transient activities, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The presence of a large transient population is often accompanied by a number of activities which would adversely affect neighborhood character, particularly in residential areas. Common problems include inadequate sanitation, litter, crime, and panhandling. Urination and defecation on public and private property poses not only an aesthetic but also public health concern. Unsightly personal shelter areas and improper disposal of trash detract from the appearance of an area. Although the number of displaced homeless may be relatively low in surrounding neighborhoods, the sensitivity of residential neighborhoods and parks to the physical changes associated with homeless activities would result in even a small

number of additional homeless having a significant impact on the physical conditions in residential neighborhoods and parks.

The solution for homelessness lies primarily in providing appropriate short-term and long-term food and shelter as well as counseling. Typically, the homeless population is classified as transitional or chronic. The transitional homeless condition is normally short-term comprised of people with low income which make them susceptible to unexpected economic setbacks such as medical emergencies or job loss. Without sufficient economic resources to absorb these events, they are no longer able to afford permanent housing. The chronic homeless are a more constant population which live on the street year after year and represent an estimated 25% of the City's homeless population. A high percentage of the chronic homeless experience varying degrees of mental disabilities.

The needs vary for the transitional and chronic homeless. The primary solution for the transitional homeless is transitional housing. The majority of these persons are able to be self-sufficient again with help. These people need temporary food and shelter, generally for 6-9 months, to be self-sufficient again. Because most transitional housing programs include classes in self-esteem and job seeking, statistics show that the persons who are transitionally homeless do not return to transitional housing once they have successfully completed a transitional housing program.

While the availability of transitional housing is important, the availability of affordable housing to accommodate individuals successfully completing a transitional housing program is equally important. Thus, an adequate supply of affordable housing is a critical component of the solution for homelessness.

The solution for the chronic homeless population requires a more long-term housing situation. These persons are generally not suited for transitional housing because they are unable to meet the requirements established by transitional housing which normally require perfect attendance for 60-90 days as well as adherence to "house rules". The chronic homeless typically require longer-term housing which can provide more intensive care to assure that they maintain medications and are assisted with normal living functions.

The importance of transitional housing and longer-term care for the chronic homeless has been known for decades. The challenge has been to adequately fund these programs as well as assuring an adequate supply of low and moderate income housing.

While the proposed Community Plan has limited opportunities to help overcome the challenges faced with funding homeless programs. The Plan can and does include proactive measures to provide affordable housing to transitional homeless once they have resolved their short-term financial problems. Under redevelopment law, a minimum of 15% of new housing must be affordable to households with low and moderate incomes. In practice, this percentage has been exceeded downtown. Since 1975, an estimated 25% of the 9,000 units are classified as affordable.

In addition to the affordable housing mandated by redevelopment law, the proposed Community Plan and PDO include additional incentives to promote affordable housing downtown such as density bonuses to developers providing affordable housing units. Policy 3.4-P-3 of the proposed Community Plan expresses CCDC's commitment to assisting in securing sites and financing for rental housing. Policy 3.4-P-4 seeks to preserve existing and construct new SRO and living units by providing funds to renovate and secure low rents in existing buildings and allow construction of new SROs, living units and other similar forms of housing in appropriate mixed use land use districts. In recognition of the role of support services in assisting the transitional homeless, Policy 3.4-P-5 emphasizes the goal of securing funding and locations for housing linked to supportive services.

Providing transitional housing and affordable housing would reduce the physical effects of the homeless on urban canyons. The homeless inhabiting urban canyons are typically the higher functioning homeless because they are better equipped to be self-sufficient. As the higher functioning homeless tend to be the ones found in the canyons, additional transitional housing and affordable housing opportunities could serve to reduce the physical impacts of transients in urban canyons since they are the best-suited to be assisted by these opportunities.

The City established a Homeless Outreach Team (HOT) program to place the homeless in appropriate housing in the City. HOT teams include a member of the police force as well as individuals with psychiatric training and a County eligibility worker. The program is completely voluntary. If the offer to place the individual in housing is declined, the HOT team provides them with referrals to food, shelter and counseling opportunities.

Mitigation Measures: No measures beyond those associated with implementation of affordable housing requirements of state redevelopment law and incentives and policies contained in the proposed Community Plan are within the control of CCDC.

B. LOCAL STREETS (TRF-A.1)

Impact TRF-A.1.1 (Impacts on Grid Streets):

The increased traffic volumes would result in significant congestion on portions of the downtown grid streets. With buildout of the Community Plan, 62 of the 275 intersections would operate at an unacceptable level of service (LOS F).

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all traffic-related impacts on grid streets, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific

economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The traffic study for the FEIR identified several intersections that would be significantly adversely impacted by increased traffic generated by the Proposed Plans and Ordinance. While most of these intersections may be improved, and the impacts reduced, by preliminarily-identified changes to the intersections themselves, there is considerable uncertainty as to whether conditions on the ground at the time of actual implementation, including physical limitations and potentially adverse impacts to pedestrian and bicycle safety, would make a particular improvement feasible. The goals and policies in the Downtown Community Plan (see FEIR page 5.2-30 and 5.2-32) will promote protection of traffic flow on the grid system, and Mitigation Measure TRF-A.1.1-1 will require regular review of the conditions on the streets downtown; however, implementation of the identified potential improvements cannot be assured. Mitigation Measures TRF-A.1.1-2 and 3 will provide funding for downtown street improvements through a Development Impact Fee or comparable mechanism.

Mitigation Measures: Mitigation Measures TRF-A.1.1-1, 2 and 3, as set forth below, are feasible and are made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure TRF-A.1.1-1: At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall conduct a downtown-wide evaluation of the ability of the grid street system to accommodate traffic within downtown as well as the following roadway segment in the surrounding neighborhood: Imperial Avenue (between 25th Street and of 28th Street). The need for roadway improvements shall be based upon standards established by CCDC, in cooperation with the City Engineer. In completing these studies, the potential improvements identified in Appendix C of the traffic study and Tables 5.2-20 and 21 of the EIR will be reviewed to determine whether these or other actions are required to improve traffic flow along affected roadway corridors. As necessary, potential improvements shall also be determined for the identified roadway segments within the surrounding neighborhoods. In selecting improvements, CCDC shall review the effect the improvement may have on pedestrian or bicycle activities whenever pedestrians must traverse any of the following roadway conditions:

- Five or more lanes at any intersection (excepting Boulevards);
- Three or more travel lanes on residential streets, or crossing roadways with four or more lanes;
- Four or more travel lanes on multi-function streets, or crossing roadways with four or more travel lanes; or
- Dual right-turn lanes.

Following the completion of each five-year monitoring event, CCDC shall incorporate needed roadway improvements into its Capital Improvement Program (CIP) or identify another implementation strategy.

In order to determine if the roadway improvements included in the current five-year CIP, or the equivalent, are sufficient to accommodate developments, a traffic study would be required for large projects. The threshold to be used for determining the need for a traffic study shall reflect the traffic volume threshold used in the Congestion Management Program (CMP). The CMP stipulates that any activity forecasted to generate 2,400 or more daily trips (200 or more equivalent peak hour trips).

Mitigation Measure TRF-A.1.1-2: Prior to approval of any development which would generate a sufficient number of trips to qualify as a large project under the Congestion Management Program (i.e. more than 2,400 daily trips, or 200 trips during a peak hour period), a traffic study shall be completed as part of the Secondary Study process. The traffic study shall be prepared in accordance with City's Traffic Impact Study Manual. If the traffic study indicates that roadways substantially affected by the project would operate at LOS F with the addition of project traffic, the traffic study shall identify improvements to grid street segments and/or intersections which would be required within the next five years to achieve an acceptable LOS or reduce congestion, to the extent feasible. If the needed improvements are already included in CCDC's CIP, or the equivalent, no further action shall be required. If any of the required improvements are not included in the CIP, or not expected within five years of project completion, CCDC shall amend the CIP, within one year of project approval, to include the required improvements and assure that they will be implemented within five years of project completion. At CCDC's discretion, the developer may be assessed a pro-rated share of the cost of improvements.

Mitigation Measure TRF-A.1.1-3: Upon adoption of the Community Plan, CCDC and the City shall update the Centre City Public Facilities Financing Plan (PFFP) to include a transportation element to be completed within six (6) months. The update to the Centre City PFFP required by this mitigation measure shall include the following:

- a) The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities;
- b) The PFFP update will specify transportation improvements as identified on Figure 7.2 of the Community Plan and further described on Table 5.2-21 and Figure 5.2-8 of this FEIR;
- c) The PFFP update will specifically include capital improvements to the downtown transit network as identified on page 7-10 and Figure 7-4 of the Community Plan and further described in Table 5.2-22 of this FEIR;
- d) For this mitigation measure, the PFFP update will not include freeway improvements, freeway ramps and will not now or in the future include transit operation or maintenance

improvements as these are specifically prohibited in Government Code 66000, which are addressed in Mitigation Measure TRF-A.2.1-2 below;

- e) The PFFP update will set forth a timeline and other agreed-upon relevant criteria for implementation of each improvement identified in items (b) and (c) above;
- f) The PFFP update will identify the total estimated costs for each improvement in items (b) and (c) above as provided for by CCDC and reviewed and confirmed by the City's Transportation Planning and Facilities Financing Section of the Planning Department;
- g) The PFFP update will include the establishment of a fair-share contribution from downtown development for improvement in items b) and c) above, through a Developer Impact Fee or secure, local alternative funding sources, in a manner that will comply with applicable law;
- h) Prior to adoption by the City of San Diego Council, the PFFP will be sent to the Entities for their review and comment;
- i) CCDC and the Facilities Financing Section of the Planning Department shall seek adoption of the PFFP update at a public hearing before the San Diego City Council within six months after adoption of the Community Plan Update. As extension not to exceed three (3) months shall be granted upon mutual consent of the Entities.

The failure or refusal of any Entity other than CCDC or the City, to cooperate in the implementation of this mitigation measure, shall not constitute a failure of CCDC or the City to implement this mitigation measure; however, the City and CCDC shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.

Impact TRF-A.1.2 (Impacts on Surrounding Streets):

The increased traffic volumes could result in significant congestion on major streets in the surrounding neighborhoods. Build-out of the proposed Downtown Community Plan will likely cause traffic volumes increases in the adjacent neighborhoods, both east and north of downtown. More specifically, the segment of Imperial Avenue, east of 28th Street would change from acceptable LOS E to unacceptable with buildout.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all traffic-related impacts on surrounding streets, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other

feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The same factors that affect the ability to mitigate traffic impacts on the downtown street grid apply in the case of the surrounding neighborhoods' streets. To the extent that physical improvements to the downtown grid, and efforts to increase transit usage, are successfully implemented, impacts to the surrounding neighborhoods should also be reduced; since they cannot be assured, however, the impacts are considered significant and not mitigated to below a level of significance.

Mitigation Measures: Mitigation Measure TRF-A.1.1-1 would serve to reduce impacts on surrounding streets but not necessarily to below a level of significance.

C. FREEWAY SYSTEM IMPACT (TRF-A.2)

Impact TRF-A.2.1 (Impact on Freeways):

Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps. The proposed Community Plan would contribute to projected substandard traffic conditions on study area freeway segments (I-5, SR-163 and SR-94) and ramps serving the downtown area.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effects of increased freeway traffic identified in the FEIR. These conditions, changes or alterations would not, however, reduce all traffic-related impacts on the freeway system to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. In addition, pursuant to CEQA Section 21081(a)(2), State CEQA Guidelines Section 15091(a)(2), and Local Agency Guidelines Section 411, the Council/Agency finds that other conditions, changes or alterations that would avoid or substantially reduce the significant environmental effect as identified in the FEIR are within the responsibility and jurisdiction of another public agency and not the Council/Agency. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Poor operations on the freeway mainlines are caused by high forecast traffic volumes and merge conflicts at the various on- and off-ramp locations. As a contributing factor to the forecast travel demands on the study area freeway facilities, the proposed Community Plan would result in significant traffic impacts to these facilities.

The traffic analysis was conducted assuming the various roadway network assumptions included in the “revenue-constrained” funding scenario of the SANDAG RTP. This was intended at the time of the analysis to represent an appropriate worst-case scenario. Since passage of the TRANSNET funding program in November 2004, the SANDAG RTP “Mobility” scenario becomes the operative plan for regional transportation planning. This scenario includes implementation of High Occupancy Vehicle (HOV) lanes on I-5 through the downtown area as well as on SR 94 serving downtown to/from the east. These improvements would, in part, improve the capacity of the freeway system and resulting traffic operations, but would not specifically address freeway ramp operations and associated access requirements for the downtown area.

Previous SANDAG studies of the regional freeway system and the ramps serving the downtown area (Central I-5 Corridor Study; Freeway Deficiency Plan, December 2003) identified potential freeway improvements that would address projected longer range deficiencies. While the study confirmed that no feasible and acceptable improvement options are available to address projected deficiencies on SR-163, north of downtown due to the demonstrated concern by public over maintaining the aesthetic qualities of this highway through Balboa Park, it did identify some concepts for improving traffic flow on I-5. These improvements included closing interchanges, adding through lanes on I-5, adding enhanced freeway to freeway connections and/or new auxiliary lanes and a modified system of ramps serving the downtown area referred to as a collector/distributor (C/D) system. It is important to note that none of these concepts have been analyzed in detail for their feasibility. Nor has environmental review been completed to determine potential environmental consequences of implementing these concepts. Furthermore, economic feasibility studies have not been completed. For example, the C/D system would have substantial effects on private property located in the path of the C/D system. In recognition of these facts, SANDAG, Caltrans and CCDC have recommended further study of the freeway improvement proposals identified by the Central I-5 Corridor Study to ensure proper consideration of all potential community and environmental impacts.

In addition, each of the ramps serving downtown were evaluated in the course of the traffic study to determine the feasibility of adding the additional lanes needed to accommodate buildout traffic. According to Table 4.14 of the Traffic Study, the feasibility of adding any additional lanes to these ramps is extremely limited. In general, the addition of lanes to the ramps is restricted by two primary factors. First, the freeway and/or ramp facilities cannot accommodate either additional merging movements or the necessary entrance/exit lane configuration. Second, the on-street network cannot accommodate either the additional lane(s) feeding or exiting the ramp.

The proposed Community Plan includes Policy 7.1-P-4 which indicates that CCDC will “work with appropriate transportation agencies on freeway improvements in and near the downtown

area.” In addition, the FEIR identifies two mitigation measures which are intended to encourage a multidisciplinary study which would develop a specific list of freeway improvements and identify funding sources. Furthermore, if appropriate, the Public Facilities Financing Plan for downtown would be amended to allow for collection of fair share contributions for freeway improvements, provided a defined program exists that will assure that funds are used in a timely fashion to offset impacts related to downtown development.

Mitigation Measures: Mitigation Measure TRF-A.2.1-1, as set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure TRF-A.2.1-1: Upon adoption of the Community Plan, CCDC shall initiate a multi-jurisdictional effort to develop a detailed, enforceable plan [the Plan] that will identify transportation improvements that would reduce congestion on I-5 through downtown, as well as identify funding sources including federal, state, regional and local funding and which may also include fair share contributions by development as well as other mechanisms based on a nexus study. The process and Plan required by this mitigation measure shall include the following.

- a) The responsible entities [the Entities] included in this effort will include, but may not be limited to, the City of San Diego, CCDC, SANDAG, Caltrans, and the Metropolitan Transit System. Other entities may be included upon the concurrence of the foregoing Entities.
- b) The Plan will specifically identify physical and operational improvements to I-5, other freeways, relevant arterial roads and transit facilities [the Improvements], that are focused on specific transportation impacts created by downtown development, and will also identify the specific responsibilities of each Entity for the construction, maintenance and financing for each Improvement. The Plan may also identify other improvements necessary to address regional transportation needs, but for purposes of this mitigation measure, the Improvements included in the Plan need only be designed to mitigate the impacts created by downtown development.
- c) The Plan will set forth a timeline and other agreed-upon relevant criteria for implementation of each Improvement.
- d) The Plan will identify the total estimated costs for each such Improvement, including construction, maintenance and operational costs [the Total Costs], and the responsibility of each Entity for both implementation and funding for such Total Costs.
- e) The Plan will include the parameters for any fair-share or development impact fee programs (or the like) to be implemented, that would require private and/or public developers to contribute to the Total Costs, in a manner that will comply with applicable law.
- f) In developing the Plan, the Entities shall also consider ways in which the Improvements can be coordinated with existing local and regional transportation and facilities financing plans and programs, in order to avoid duplication of effort and expenditure; however, the existence

of such other plans and programs shall not relieve the Entities of their collective obligation to develop and implement the Plan as set forth in this mitigation measure. Nothing in the Plan shall be construed as relieving any Entity (or any other entity) from its independent responsibility (if any) for the planning, funding, construction, maintenance or operation of any transportation improvement.

- g) Upon adoption of the Plan by the City Council, SANDAG, MTS and Caltrans will also seek endorsement of same through their government structures.
- h) CCDC shall seek adoption of the Plan at a public hearing before the City Council within one year of the initiation of the multi-jurisdictional effort to develop the Plan. CCDC shall report in writing, and at a public hearing before the City Council and SANDAG (if SANDAG agrees to place such a report on its agenda), regarding the progress made to develop the Plan, within six months of the first meeting of the entities. Thereafter, CCDC shall report to the City Council at least annually regarding the progress of the Plan, for a period of not less than five years, which may be extended at the request of the City Council.
- i) The Plan shall also expressly include each Entity's pledge that it will cooperate with CCDC in making the required reports to the Agency, including the presence and participation of a responsible representative of the Entity at all public hearings called for the purpose of reviewing the progress of development and implementation of the Plan.
- j) The PFFP shall be amended to include any projects in the Plan that CCDC and the City Council determine are appropriate for inclusion in the PFFP. The amendment to the PFFP to accommodate such appropriate improvements shall be processed for adoption at the time the Plan is submitted for adoption to the City Council.

The failure or refusal of any Entity other than CCDC or the City to cooperate in the implementation of this mitigation measure shall not constitute a failure of CCDC or the City to implement this mitigation measure; however, the CCDC and City shall each use its best efforts to obtain the cooperation of all responsible Entities to fully participate, in order to achieve the goals of the mitigation measure.

Further, if the City Council or Redevelopment Agency finds that (1) any of the Entities fails or has failed to cooperate in the development or implementation of this Plan, or (2) there is insufficient funding for implementation of the improvements in accord with the Plan, or (3) development downtown has significantly outpaced the development of infrastructure needed to support the development, the Council/Agency shall thereafter review the status of the Plan and its improvements, to determine whether substantial evidence shows that any of the conditions listed in Public Resources Code section 21166 and Guidelines section 15162 exist, so that additional environmental documentation would be required. In any event, the annual progress report delivered by CCDC pursuant to this mitigation measure shall include an evaluation of whether any of these conditions exist.

Impact TRF-A.2-2 (Elimination of Cedar Street Off-ramp):

Elimination of the Cedar Street off-ramp would adversely impact the freeway system and connecting surface streets.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effects on freeway traffic, identified in the FEIR. These conditions, changes or alterations would not, however, reduce all traffic-related impacts, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR, as discussed in Section VI of these Findings. In addition, pursuant to CEQA Section 21081(a)(2), State CEQA Guidelines Section 15091(a)(2), and Local Agency Guidelines Section 411, the Council/Agency finds that other conditions, changes or alterations that would avoid or substantially reduce the significant environmental effect as identified in the FEIR are within the responsibility and jurisdiction of another public agency and not the Council/Agency. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: As noted in the FEIR, one of the street modifications proposed by the Downtown Community Plan is the closure of the southbound I-5 off-ramp to Cedar Street and conversion of Cedar Street to two-way traffic. Closure of the Cedar Street I-5 freeway off-ramp would cause an overall increase in traffic on other off-ramps serving the downtown area, particularly the off-ramps at Front Street and Tenth Avenue. Since a number of these ramps are projected to operate at substandard LOS F under build-out of proposed Downtown Community Plan, and since the closure of the Cedar Street off-ramp will cause additional use of these identified substandard ramps, the closure of the Cedar Street off-ramp from southbound I-5 is also identified as a direct project-related significant impact. While Mitigation Measure TRF A.2.2-1 would require study prior to implementing any closure of the Cedar Street off-ramp, there is insufficient information regarding the actual feasible alternatives or other roadway modifications, to determine that the closure would not result in a significant and not mitigated impact. Further, because some of these measures require the concurrence of other agencies, there is no assurance the impacts would be reduced to below a level of significance.

Mitigation Measures: Mitigation Measure A.2.2-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure TRF A.2.2-1: Prior to elimination of the Cedar Street off-ramp from I-5, a traffic study shall be done by CCDC in consultation with the City of San

Diego and Caltrans to determine the potential effects associated with elimination of the off-ramp and the conversion of Cedar Street from one- to two-way. The report shall also identify roadway modifications that would minimize potential impacts on local surface streets and I-5.

D. PARKING (TRF-D.1)

Impact TRF-D.1 (Excessive Parking Demand):

Buildout of downtown could create a significant parking impact due to the potential for demand to exceed supply.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant parking impact identified in the FEIR. These conditions, changes or alterations would not, however, reduce all parking-related impacts, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR, as discussed in Section VI of these Findings. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Parking ratios established by the PDO would be inadequate to assure that the full demand for parking created by new development is met. In addition, there is no guarantee that private or public parking structures would be provided to meet the unfulfilled demand.

While the EIR conclusions cannot rely on independent parking facilities, the fact is that the current supply of parking is within 2% of the current demand due to the fact that private and public parking facilities have been built downtown. The close relationship of demand to supply has occurred despite the fact that, to date, parking has only been required to be provided by residential development. Thus, it would not be unreasonable to assume that additional private and public parking facilities would be constructed to meet the increased demand.

Furthermore, meeting the full demand for parking through required parking ratios is not considered good planning. Maximizing parking encourages vehicle trips which create additional congestion and gridlock on surface streets as well as increasing air pollution as vehicles idle for longer periods of time. Maximizing parking also discourages transit use and alternate forms of transportation including walking and biking.

Placing the burden of full parking on future development through onsite construction or payment of a fair share fee would increase the cost of construction which would, in turn, increase the cost of development. This would be particularly undesirable with respect to residential development due to the City's goal for achieving affordable housing in downtown.

Fully parking each individual project would discourage development of shared parking resources to maximize the use of parking throughout the 24-hour day. Parking is not considered the highest and best use for the valuable property in downtown.

Lastly, the standards contained in the proposed PDO exceed requirements in other similar West Coast cities, which often incorporate zero parking minimums and/or maximum parking requirements. Parking shortfalls are best resolved through specific solutions such as shared parking, increased on-street parking through angled spaces, visitor/service spaces, etc.

The potential for parking shortages in the downtown, as noted in the FEIR, could also result in additional parking in the adjacent neighborhoods, both east and north of I-5. Currently, parking in the adjacent neighborhoods occurs, for the most part, by parkers desiring to avoid the costs of parking in the more central downtown core areas. This generally requires an extensive walk to the primary destinations, which tends to discourage this behavior for all but for a minority of downtown parkers. In the future and with the identified potential for parking shortages in the downtown area, a greater share of parkers could seek parking in the adjacent neighborhoods.

The extent of parking in the adjacent neighborhoods will be a function of both the cost and availability of downtown parking as well as the specific uses developed in the adjacent sections of the downtown area. A number of public and private actions may be taken to reduce or avoid the potential parking shortages, and the regular study of parking needs, as required by Mitigation Measure TRF-D.1-1, will aid in identifying and implementing such actions.

Mitigation Measures: Mitigation Measure TRF-D.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure TRF-D.1-1: At five-year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall evaluate the parking supply and demand within the downtown area as well as assess the amount of parking generated by downtown development in residential areas within a quarter-mile radius of downtown. The evaluations will include an inventory of the number of public and private parking spaces available for public parking within downtown and the residential neighborhoods within a quarter-mile radius of downtown. The evaluation shall determine the current as well as anticipated parking supply and demand during the ensuing five-year period. Based on the evaluation, CCDC shall determine if the discrepancy between demand and supply warrant ameliorative actions which may include but not be limited to: (1) constructing new public parking, (2) implementing specific shared parking programs with private parking facilities, (3) implementing parking meter programs that respond to changes in the parking demand which occur during a 24-hour period and/or (4)

implementing residential permit parking programs. Any actions identified during the parking evaluation shall be incorporated into CCDC's Capital Improvement Program, if appropriate, or carried out through some other form of enforcement such as amending Planned District Ordinances or other regulatory programs dealing with parking.

E. HISTORICAL RESOURCES (HIST-A)

Impact HIST-A.1 (Impacts to Historical Resources):

The demolition or substantial alteration of a resource listed on, or formally recommended eligible for, the National Register or California Register, including contributors to National Register or California Register Historic Districts; or listed on the San Diego Register, including contributors to San Diego Register Historic Districts; or that meet the CEQA criteria for historical resources would represent a significant direct impact. Future development within downtown pursuant to the proposed Downtown Community Plan could have a significant impact on historical resources. Although the impact cannot be accurately predicted on a plan-wide basis, impacts to historical resources may include substantial alteration, relocation, or demolition.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the significant environmental effect identified in the FEIR. These conditions, changes or alterations would not, however, reduce all impacts to historical resources to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Adoption of the Downtown Community Plan will not, by itself, result in a significant impact upon historical resources. The goals and policies in the Downtown Community Plan will encourage the preservation and appropriate integration of historical resources into new development activity. Implementing the goals and policies, and following the Secretary of the Interior's Standards and Guidelines with respect to National Register- and California Register-listed/eligible structures, could reduce the impacts to such resources. Notwithstanding these goals and policies, however, and the implementation of Mitigation Measures HIST-A.1-1 through 3, it may not be feasible in a given instance to implement sufficient preservation, rehabilitation or reuse measures to reduce impacts to historic structures to below a level of significance.

For San Diego Register Listed resources, where retention or relocation is determined infeasible pursuant to the City's Historic Resource Regulations, as implemented through the City's Site Development Permit process, a Documentation Program (DP) shall be prepared and implemented pursuant to Mitigation Measure HIST A.1-3. While it is anticipated that the majority of the San Diego Register Resources would be retained or relocated, the potential exists for San Diego Register Listed resources to be demolished. It is considered speculative to determine whether implementation of Mitigation Measure A.1-3 would be able to reduce impacts to those resources to below a level of significance. Therefore, impacts to San Diego Register Listed are considered potentially significant and unmitigated.

Mitigation Measures: Mitigation Measures HIST-A.1-1 through 3, which are set forth below, are feasible and made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure HIST-A.1-1: For historic resources which are 45 years of age or older and which have not been evaluated for local, state and federal historic significance, CCDC shall consult with HRB to determine whether the resources is significant pursuant to CEQA.

For resources that have been formally determined to be significant under federal, state or local criteria, the following actions shall be carried out under direction of CCDC in consultation with HRB, as appropriate.

- **National Register-Listed/Eligible, California Register-Listed/Eligible Resources:** Resources listed on or formally determined eligible for the National Register or California Register and structures identified as contributing structures within a National or California Register District, shall be retained onsite and any improvements, renovation, rehabilitation and/or adaptive reuse of the property shall ensure its preservation according to the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings and Guidelines for Rehabilitation of Historic Buildings.
- **San Diego Register-Listed Resources:** Any development that proposes to remove or significantly alter one of these historical resources shall comply with Chapter 14, Article 3, Division 2 of the San Diego Municipal Code which regulates Historical Resources.

Mitigation Measure HIST-A.1-2: If the potential exists for direct and/or indirect impacts to retained or relocated designated historical resources, the following measures shall be implemented.

I. Prior to Permit Issuance

A Construction Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for

historical monitoring during demolition and/or stabilization have been noted on the appropriate construction documents.

(a) Stabilization work can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits.

(b) Physical description, including the year and type of structure, and extent of stabilization shall be noted on the plans.

B. Submittal of Treatment Plan for Retained Historic Resources

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Applicant shall submit a Treatment Plan to CCDC for review and approval that includes measures for protecting any historic buildings and/or building components during construction related activities (e.g. removal of non-historic features, demolition of adjacent structures, subsurface structural support, etc.). The Treatment Plan shall be shown as notes on all construction documents (i.e. Grading and/or Building Plans).

C. Letters of Qualification have been submitted to CCDC

1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the historical monitoring program (i.e., Architectural Historian, Historic Architect and/or Historian), as defined in the City of San Diego Historical Resources Guidelines (HRG).
2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the historical monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Documentation Program (DP)

1. Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to CCDC for review and approval and shall include the following:

(a) Photo Documentation

(1) Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.

(2) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City

of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).

(b) Required drawings

(1) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blueline drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.

(2) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).

2. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical Monitoring Program with the Construction Manager and/or Grading Contractor.

(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Historical Monitoring Plan (HMP)

(a) Prior to the start of any work that requires monitoring, the PI shall submit a Historical Monitoring Plan which describes how the monitoring would be accomplished for approval by CCDC. The HMP shall include an Historical Monitoring Exhibit (HME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.

(b) Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.

(c) The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as

underpinning, shoring and/or extensive excavation which could result in impacts to, and/or reduce impacts to the on-site or adjacent historic resource.

- C. Implementation of Approved Treatment Plan for Historic Resources
1. Implementation of the approved Treatment Plan for the protection of Historic Resources within the project site may not begin prior to the completion of the Documentation Program as defined above.
 2. The Historian and/or Architectural Historian shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historic resource to photo document the Treatment Plan process.
 3. The Historian and/or Architectural Historian shall document activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to CCDC.
 4. Prior to the start of any construction related activities, the applicant shall provide verification to CCDC that all historic resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report.
 5. CCDC will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed.
- D. Verification of approval of a Historical Commemorative Program (HCP), if applicable
1. The applicant shall submit documentation to CCDC for concurrent review and approval by HRB for a site-specific HCP, if mitigation for impacts to a designated resource is based on association with an important person, event or community history and the building would not be retained on-site.
 2. CCDC shall provide a letter to the applicant approving or denying the proposal prior to the first preconstruction meeting and/or issuance of any construction permit. However, should CCDC grant conditional approval of the proposal, construction may be allowed to proceed, but the Certificate of Occupancy may not be issued until the historical commemorative program is approved.
 3. Prior to the issuance of any Certificate of Occupancy, the applicant shall provide verification to CCDC that the HCP has been implemented in accordance with the approved program. This may include a site visit with CCDC, the CM, RE or BI, but may also be accomplished through submittal of photo documentation or appropriate reporting program.
 4. CCDC will provide written verification to the RE or BI after the site visit indicating that the Certificate of Occupancy can issued.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to historical resources as identified on the HME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY incidents involving the historical resource. The RE shall forward copies to CCDC.
3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition arises which could effect the historical resource being retained on-site or adjacent to the construction site.

B. Notification Process

1. In the event of damage to a historical resource retained on-site or adjacent to the project site, the Historical Monitor shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI).
2. The PI shall immediately notify CCDC by phone of the incident, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination/Evaluation of Impacts to a Historical Resource

1. The PI shall evaluate the incident relative to the historical resource.
 - (a) The PI shall immediately notify CCDC by phone to discuss the incident and shall also submit a letter to CCDC indicating whether additional mitigation is required.
 - (b) If impacts to the historical resource are significant, the PI shall submit a proposal for mitigation and obtain written approval from CCDC. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.
 - (c) If impacts to the historical resource are not considered significant, the PI shall submit a letter to CCDC indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Night Work

A. If night work is included in the contract

1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
2. The following procedures shall be followed.
 - (a) No Impacts/Incidents

In the event that no historical resources were impacted during night work, the PI shall record the information on the CSV and submit to CCDC via fax by 9 am the following morning, if possible.

- (b) Potentially Significant Impacts
If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed.
 - (c) The PI shall immediately contact CCDC, or by 8 am the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify CCDC immediately.
 - C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring,
 - (a) The preconstruction Treatment Plan and Documentation Plan (photos and measured drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report.
 - (b) The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the resource. Updated forms shall be submitted to the South Coastal Information Center with the Final Monitoring Report.
 - 2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.
 - 4. CCDC shall provide written verification to the PI of the approved report.
 - 5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Final Monitoring Report(s)
 - 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC.

Mitigation Measure HIST-A.1-3: If a Designated Local Register historical resource would be demolished, the following measure shall be implemented.

I. Prior to Issuance of a Demolition Permit

A. A Documentation Program (DP) shall be submitted to CCDC for review and approval and shall include the following:

1. Photo Documentation

(a) Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.

(b) Xerox copies or CD of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the CCDC Project file. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).

2. Required drawings

(a) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.

(b) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the CCDC Project file, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).

B. Prior to the first Precon Meeting, CCDC shall verify that the DP has been approved.

C. In addition to the Documentation Program, the Applicant shall comply with any other conditions contained in the Site Development Permit, as approved through the City's Historic Regulations contained in Chapter 14, Article 3, Division 2, which shall include but not be limited to one or more actions prepared and adopted by the HRB for demolition of the Local Register Resource.

F. ARCHAEOLOGICAL RESOURCES (HIST-B)

Impact HIST-B.1 (Impacts to Archeological Resources):

If important archaeological sites are located at redevelopment sites, construction activities, such as grading and excavation, could result in significant impacts.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effects. These conditions, changes or alterations may not, however, reduce in all circumstances the impacts to archaeological resources to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR, as discussed in Section VI of these Findings. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Archaeological resources may be difficult to detect prior to construction activities, as they are located underground. In the downtown planning area, archaeological resources have been found within inches of the ground surface. Therefore, the potential to affect important archaeological sites exists if a redevelopment activity requires even minimal grading and/or excavation. The likelihood of encountering archaeological resources is greatest on redevelopment sites that have been minimally excavated in the past (e.g., vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements; etc.). Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing the archaeological resources has been removed. In addition, building demolition and surface clearance could result in impacts to archaeological resources. While there are no formal cemeteries or recorded burials downtown, prehistoric burials are possible. Consequently, the potential for encountering human remains during construction of redevelopment activities is considered low. Nevertheless, impacts to human remains as a result of the proposed Plan may occur.

If during development, an important archaeological site is discovered, and has not been compromised through the development activities, preservation through the avoidance of the remaining portion and implementation of an appropriate Research Design and Data Recovery Program would reduce impacts. Notwithstanding the implementation of Mitigations Measure HIST-B.1-1, such preservation may or may not be feasible under the circumstances of a particular development, or else the discovery may not be made until destruction has occurred, in

which case preservation and implementation of a Research Design and Data Recovery Program may not sufficiently reduce the impacts to an insignificant level.

Mitigation Measures: Mitigation Measure HIST-B.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure HIST-B.1-1: If the potential exists for archaeological resources, the following measures shall be implemented.

I. Prior to Permit Issuance

A. Construction Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Centre City Development Corporation (CCDC) shall verify that the requirements for Archaeological Monitoring and Native American monitoring, if applicable, have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to CCDC

1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from CCDC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to CCDC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to CCDC requesting a reduction to the 1/4 mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager

(CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified Archaeologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

(a) If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Archaeological Monitoring Plan (AMP)

(a) Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Plan which describes how the monitoring would be accomplished for approval by CCDC. The AMP shall include an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits.

(b) The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

(c) Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.

(d) The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during soil remediation and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.

2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to CCDC.

3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities,

presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI and Native American representative, if applicable, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - (a) The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required.
 - (b) If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - (c) If resource is not significant, the PI shall submit a letter to CCDC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and the following procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, CCDC, and the PI, if the Monitor is not qualified as a PI.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, shall determine the need for a field examination to determine the provenience.

3. If a field examination is not warranted, the Medical Examiner shall determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains are determined to be Native American
1. The Medical Examiner shall notify the Native American Heritage Commission (NAHC). By law, only the Medical Examiner can make this call.
 2. The NAHC shall contact the PI within 24 hours or sooner, after Medical Examiner has completed coordination.
 3. NAHC shall identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information..
 4. The PI shall coordinate with the MLD for additional consultation.
 5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, if:
 - (a) The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 24 hours after being notified by the Commission; OR;
 - (b) The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.
- D. If Human Remains are not Native American
1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with CCDC, the applicant/landowner and the Museum of Man.

V. Night Work

- A. If night work is included in the contract
1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - (a) No Discoveries
In the event that no discoveries were encountered during night work, the PI shall record the information on the CSVR and submit to CCDC via fax by 9am the following morning, if possible.
 - (b) Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains.
 - (c) Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

- B. If night work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify CCDC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring,
 - (a) For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - (b) Recording sites with State of California Department of Parks and Recreation
 - The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
 - 2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.
 - 4. CCDC shall provide written verification to the PI of the approved report.
 - 5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Artifacts and Submittal of Collections Management Plan, if applicable
 - 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
 - 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

3. The PI shall submit a Collections Management Plan to CCDC for review and approval for any project which results in a substantial collection of historical artifacts.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with CCDC and the Native American representative, as applicable.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.
- D. Final Monitoring Report(s)
1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.
 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution.

G. PUBLIC VIEWS AND VIEW CORRIDORS (VIS-B)

Impact VIS-B.1 (San Diego Bay and Coronado Bay Bridge View Interruption):

Buildout of the East Village sub-districts would have a significant impact on views of San Diego Bay and the San Diego-Coronado Bay Bridge from Balboa Park and Highway 94.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the significant environmental effects identified in the FEIR. These conditions, changes or alterations would not, however, reduce all impacts to visual resources to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The proposed Plan would promote slender upper towers on future high-rise buildings in order to allow intervening views of the Bay and the bridge. Goal 5.3-G-2 would encourage building design that would result in maintaining views of the Bay. However, views of the San Diego Bay and San Diego-Coronado Bay Bridge are largely uninterrupted at the present time from both Balboa Park and Highway 94, because the intervening East Village is currently predominated by low-rise buildings. Thus, any new high-rise development in the area

would result in increased view blockage and the impact would be significant. The only way to avoid these impacts would be to substantially curtail high-rise development in the East Village sub-districts, which would contravene the overall goals of the Downtown Community Plan, to reinforce downtown as the urban center of the City.

Mitigation Measures: No mitigation is feasible.

H. NOISE GENERATORS (NOI-A)

Impact NOI-A.1 (Traffic Noise Increase):

Traffic noise on nine of the grid street segments would significantly increase with implementation of the proposed Community Plan. The increased traffic volumes associated with the proposed Community Plan would result in a significant noise increase (>3.0 dB(A) CNEL for noise levels already exceeding 65 dB(A) CNEL, or causing a noise level to exceed the 65 dB(A) CNEL threshold) along nine street segments in the downtown planning area.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the traffic-related significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce the traffic noise impacts identified above to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Physical noise attenuation measures along several of the identified roadway segments cannot be implemented because of existing restrictions on available land to construct noise attenuation walls; further, such walls would not likely reduce impacts to uses above the ground floor. Retrofitting existing structures with such walls would again encroach into available land, and even if a wall could be fitted onto a site, it cannot be constructed without the property owners' consent. Due to the uncertainty regarding the physical ability to construct effective attenuation walls, and the property owners' willingness to agree to such construction, this impact is considered significant and not mitigated.

Mitigation Measures: No feasible mitigation measures are available.

I. INTERIOR NOISE (NOI-B)

Impact NOI-B.1 (Interior Traffic Noise):

Segments of grid streets downtown as well as I-5 are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL and, thus, could result in interior noise levels in excess of 45 dB(A) CNEL.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effects associated with interior traffic noise to below a level of significance. Thus, the impacts are considered **significant but mitigated**.

Facts in Support of Finding: A number of street segments downtown are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL. Noise sensitive uses within 475 feet of I-5 could be impacted as well. Any habitable areas associated with future residential or other noise-sensitive land use facing these highlighted segments could experience interior noise levels in excess of 45 dB(A) CNEL if adequate insulation is not provided.

The FEIR sets forth specific criteria for identifying such impacted land uses, and requires an acoustical study before a building permit is issued, to determine appropriate and effective mitigation measures that would be incorporated into any new project. Through the implementation of Mitigation Measure NOI-B.1-1, interior noise levels for such projects would thereby be reduced to below a level of significance.

Mitigation Measures: Mitigation Measure NOI-B.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure NOI-B.1-1: Prior to approval of a Building Permit for any residential, hospital, or hotel within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to confirm that architectural or other design features are included which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.

Impact NOI-B.2 (Interior Ballpark Noise):

Noise generated during ballgames or concerts at Petco Park would have a significant direct impact on nearby noise sensitive uses. As discussed earlier, noise from crowds or amplified music could cause interior noise levels to exceed 45 dB (A) within four blocks for the ballpark. However, exterior noise levels would not exceed acceptable levels when average over a 24-hour period.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or

alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR to below a level of significance. Thus, the impacts are considered **significant but mitigated**.

Facts in Support of Finding: Noise-sensitive uses that could be significantly impacted by ballpark noise have already been identified in the Ballpark, which also concluded that noise attenuation measures would be required to mitigate this impact to below a level of significance. By requiring an acoustical analysis to identify any new such sensitive uses, before issuance of the building permit, the FEIR assures that the appropriate noise attenuation measures are implemented to mitigate the impacts of ballpark noise to acceptable levels.

Mitigation Measures: Mitigation Measure NOI-B.2-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure NOI-B.2-1: Prior to approval of a Building Permit for any noise-sensitive land uses within four blocks of Petco Park, an acoustical analysis shall be performed. The analysis shall confirm that architectural or other design features are included in the design which would assure that noise levels within habitable rooms would not exceed 45 dB(A) CNEL.

J. EXTERIOR NOISE IN RESIDENTIAL DEVELOPMENT (NOI-C)

Impact NOI-C.1 (Exterior Traffic Noise in Residential Development):

Segments of grid streets downtown as well as I-5 are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL and, thus, could expose required outdoor open space to noise levels considered unacceptable.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce the exterior traffic noise impacts, identified above, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Outdoor activities such as swimming and barbequing are more enjoyable in areas where background traffic noise levels are less than 65 dB(A) CNEL because higher levels interfere with normal conversation. Therefore, residential recreation activities in

areas above 65 dB(A) CNEL would be significantly impacted. Although the implementation of Mitigation Measure NOI-C.1-1 would reduce noise impacts in outdoor areas, it cannot be said that in every situation the effects would be reduced to below the level of 65 dB(A) CNEL.

Mitigation Measures: Mitigation Measure NOI-C.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure NOI-C.1-1: Prior to approval of a Development Permit for any residential development within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any required outdoor open space areas would be exposed to noise levels in excess of 65 dB(A) CNEL. Provided noise attenuation would not interfere with the primary purpose or design intent of the exterior use, measures shall be included in building plan, to the extent feasible.

Impact NOI-C.2 (Exterior Aircraft Noise in Residential Development):

Aircraft noise associated with San Diego International Airport would impact required outdoor open space within residential development located in the northern portion of downtown.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the significant environmental impacts identified in the FEIR. These conditions, changes or alterations may not, however, reduce aircraft noise impacts, identified above, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The existing CLUP for San Diego International Airport indicates that aircraft noise levels in the northwestern portion of the downtown planning area would be in excess of 65 dB(A) CNEL. As a result, residential and other noise-sensitive uses in the northern portion of the plan area would experience noise levels that would exceed 65 dB(A) CNEL. While future residential units would be required by Title 21 to achieve a 45 dB(A) CNEL level in all habitable rooms, traditional noise attenuation for exterior noise (e.g. walls) would be ineffective as the noise source would be vertical rather than lateral. Full enclosure of open spaces could reduce the noise level to below 65 dB(A) CNEL, but this would defeat the primary goal of creating "outdoor" open space. Thus, required outdoor open space areas in new residential development could be significantly impacted by aircraft noise.

Mitigation Measures: No feasible mitigation measures are available.

K. EXTERIOR NOISE IN PUBLIC PARKS AND PLAZAS (NOI-D)

Impact NOI-D.1 (Exterior Traffic Noise in Public Parks and Plazas):

Segments of grid streets downtown as well as I-5 are expected to carry traffic volumes which would create traffic noise in excess of 65 dB (A) CNEL and, thus, could expose public parks and plazas to noise levels considered significant.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the significant environmental impacts identified in the FEIR. These conditions, changes or alterations may not, however, reduce traffic noise impacts on all public parks and plazas to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Recreation activities in public parks and plazas, including picnicking, conversations, and other activities are more enjoyable in areas where background traffic noise levels are less than 65 dB(A) CNEL. Among other things, levels higher than 65 dB(A) CNEL interfere with normal conversation.

At this stage, the actual spatial relationship between any future planned open space and the affecting source of the traffic noise is not known. Accordingly, it cannot be determined whether that open space would be significantly impacted. Assuming a significant level of impact, the available "mitigation" measures (e.g. enclosing the "open space" or building attenuation walls) defeat the basic purpose of providing open space.

Therefore, recreation activities in public parks and plazas above 65 dB(A) CNEL could be significantly impacted.

Mitigation Measures: Mitigation Measure NOI-D.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure NOI-D.1-1: Prior to approval of a Development Permit for any public park or plaza within 475 feet of the centerline of Interstate 5 or adjacent to a roadway carrying more than 7,000 ADT, an acoustical analysis shall be performed to determine if any recreation areas would be exposed to noise levels in excess of 65 dB(A)

CNEL. Provided noise attenuation would not interfere with the intended recreational use or park design intent, measures shall be included, to the extent feasible.

Impact NOI-D.2 (Exterior Aircraft Noise in Public Parks and Plazas):

Aircraft noise associated with San Diego International Airport would impact recreation activities within public parks and plazas located in the northern portion of downtown.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce aircraft noise impacts to public parks and plazas to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The existing CLUP for San Diego International Airport indicates that aircraft noise levels in the northwestern portion of the downtown planning area would be in excess of 65 dB(A) CNEL. As a result, recreation activities within public parks and plazas in the northern portion of the plan area would experience noise levels that would exceed 65 dB(A) CNEL. The same issues presented by any attempt to mitigate traffic noise upon public parks and plazas apply to the impacts created by aircraft noise.

Mitigation Measures: No feasible mitigation measures are available.

L. EXPOSE SENSITIVE RECEPTORS TO UNACCEPTABLE EMISSION LEVELS (AQ-B)

Impact AQ-B.1 (Construction Emissions):

Particulates generated during construction activities could exceed acceptable local standards and pose a health risk to nearby sensitive receptors.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR to below a level of significance. Thus, the impacts are considered **significant but mitigated**.

Facts in Support of Finding: Emissions related to construction activity are considered short-term sources as their duration is limited to the period of construction at any single site within downtown. However, as construction may occur throughout the buildout process for downtown, these construction emissions would normally be present at various locations throughout downtown. Based on the air quality analysis contained in Appendix 2.7 to this FEIR, implementation of standard dust controls mandated by the City of San Diego, as well as implementation of the controls required by Mitigation Measure AQ-B.1-1, will reduce impacts to below a level of significance.

Mitigation Measures: Mitigation Measure AQ-B.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure AQ-B.1-1: Prior to approval of a Development Permit which may involve grading and/or building demolition, the City shall confirm that the following conditions have been applied, as appropriate:

1. Exposed soil areas shall be watered twice per day. On windy days or when fugitive dust can be observed leaving the development site, additional applications of water shall be applied as necessary to prevent visible dust plumes from leaving the development site. When wind velocities are forecast to exceed 25 miles per hour, all ground disturbing activities shall be halted until winds that are forecast to abate below this threshold.
2. Dust suppression techniques shall be implemented including, but not limited to, the following:
 - a. Portions of the construction site to remain inactive longer than a period of three months shall be seeded and watered until grass cover is grown or otherwise stabilized in a manner acceptable to the CCDC.
 - b. On-site access points shall be paved as soon as feasible or watered periodically or chemically stabilized.
 - c. Material transported offsite shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
 - d. The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times.
3. Vehicles on the construction site shall travel at speeds less than 15 miles per hour.
4. Material stockpiles subject to wind erosion during construction activities, which will not be utilized within three days, shall be covered with plastic, an alternative cover deemed equivalent to plastic, or sprayed with a nontoxic chemical stabilizer.

5. Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface. Any visible track-out extending for more than fifty (50) feet from the access point shall be swept or washed within thirty (30) minutes of deposition.
6. All diesel-powered vehicles and equipment shall be properly operated and maintained.
7. All diesel-powered vehicles and gasoline-powered equipment shall be turned off when not in use for more than five minutes, as required by state law.
8. The construction contractor shall utilize electric or natural gas-powered equipment in lieu of gasoline or diesel-powered engines, where feasible.
9. As much as possible, the construction contractor shall time the construction Plans and Ordinance so as not to interfere with peak hour traffic. In order to minimize obstruction of through traffic lanes adjacent to the site, a flag-person shall be retained to maintain safety adjacent to existing roadways, if necessary.
10. The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew.
11. Low VOC coatings shall be used as required by SDAPCD Rule 67. Spray equipment with high transfer efficiency, such as the high volume-low pressure (HPLV) spray method, or manual coatings application such as paint brush hand roller, trowel, spatula, dauber, rag, or sponge, shall be used to reduce VOC emissions, where feasible.
12. If construction equipment powered by alternative fuel sources (LPG/CNG) is available at comparable cost, the developer shall specify that such equipment be used during all construction Plans and Ordinance on the development site.
13. The developer shall require the use of particulate filters on diesel construction equipment if use of such filters is demonstrated to be cost-competitive for use on this development.
14. During demolition Plans and Ordinance, safety measures as required by City/County/State for removal of toxic or hazardous materials shall be utilized.
15. Rubble piles shall be maintained in a damp state to minimize dust generation.
16. During finish work, low-VOC paints and efficient transfer systems shall be utilized, to the extent possible.
17. If alternative fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible.

M. PALEONTOLOGICAL RESOURCES (PAL-A)

Impact PAL-A.1 (Impacts to Paleontological Resources):

Construction activities resulting from the Downtown Community Plan would have the potential to result in significant impacts to paleontological resources.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce the significant environmental effect identified in the FEIR to below a level of significance. Thus, the impacts are considered **significant but mitigated**.

Facts in Support of Finding: Except in areas underlain by artificial fill, all development associated with the Downtown Community Plan would occur on geologic formations that are assigned a high paleontological resource sensitivity. Any development that involves grading or excavation beyond the one to three foot depth of surficial fills for foundations, subterranean parking, or below-grade features including utility trenches would have the potential to expose fossil-bearing geologic formations and adversely impact paleontological resources. Implementation of Mitigation Measure PAL-A.1-1, however, would provide sufficient oversight and resources to reduce the potential for a significant impact on any paleontological resources located on the development site.

Mitigation Measures: Mitigation Measure PAL-A.1-1, which is set forth below, is feasible and is made binding through the Proposed Plans and Ordinance conditions of approval and through the MMRP.

Mitigation Measure PAL-A.1-1: If the potential exists for significant paleontological resources, a monitoring program in accordance with the following mitigation measure would be implemented.

I. Prior to Permit Issuance

A. Construction Plan Check

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Permits and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, Centre City Development Corporation (CCDC) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to CCDC

1. The applicant shall submit a letter of verification to CCDC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.

2. CCDC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from CCDC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to CCDC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and CCDC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with CCDC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to CCDC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to CCDC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to CCDC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or

absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and CCDC of changes to any construction activities.
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of any discoveries. The RE shall forward copies to CCDC.
3. The PI may submit a detailed letter to CCDC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify CCDC by phone of the discovery, and shall also submit written documentation to CCDC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify CCDC by phone to discuss significance determination and shall also submit a letter to CCDC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from CCDC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been

made. The Paleontologist shall continue to monitor the area without notification to CCDC unless a significant resource is encountered.

- d. The PI shall submit a letter to CCDC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night Work

- A. If night work is included in the contract
 1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries
 - (1) In the event that no discoveries were encountered during night work, The PI shall record the information on the CSV and submit to CCDC via fax by 9am the following morning, if possible.
 - b. Discoveries
 - (1) All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
 - c. Potentially Significant Discoveries
 - (1) If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
 - d. The PI shall immediately contact CCDC, or by 8AM the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 2. The RE, or BI, as appropriate, shall notify CCDC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Submittal of Draft Monitoring Report
 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to CCDC for review and approval within 90 days following the completion of monitoring,
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum
 - (1) The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources

- encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
2. CCDC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 3. The PI shall submit revised Draft Monitoring Report to CCDC for approval.
 4. CCDC shall provide written verification to the PI of the approved report.
 5. CCDC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains
1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate
- C. Curation of fossil remains: Deed of Gift and Acceptance Verification
1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and CCDC.
- D. Final Monitoring Report(s)
1. The PI shall submit two copies of the Final Monitoring Report to CCDC (even if negative), within 90 days after notification from CCDC that the draft report has been approved.
 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from CCDC which includes the Acceptance Verification from the curation institution.

V. FINDINGS REGARDING CUMULATIVE ENVIRONMENTAL IMPACTS

A. AIR QUALITY (AQ-A)

Increase in Mobile Source Emissions (Impact AQ-A.1):

Implementation of the proposed Downtown Community Plan would result in a significant cumulative air quality impact relative to mobile-source emissions.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which

could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, be able to reduce cumulative impacts to air quality to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the mobile-source emission impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The San Diego Air Basin is currently classified by the US EPA as a non-attainment area for ozone. All new development in the San Diego Air Basin compounds these problems by creating more emissions. New development within the downtown planning area would be no exception, creating long-term air emissions related primarily to increased vehicular use. Because the San Diego Air Basin already is impacted, any new development would have a significant cumulative impact on regional air quality.

The proposed Plan would concentrate development in an area which is well served by transit and offers a variety of opportunities to work and live in the same area. Federal, state and local regulations mandate as well as recommend measures to be incorporated by subsequent development within the Air Basin are anticipated to be incorporated into future development within downtown, as appropriate.

Mitigation Measures: There are no additional mitigation measures for cumulative mobile-source emission impacts.

Construction Emissions (Impact AQ-B.1):

Implementation of the proposed Downtown Community Plan would result in a significant cumulative air quality impact related to dust and construction equipment emissions.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, be able to reduce cumulative impacts to air quality to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the construction emission impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The San Diego Air Basin is currently classified by the US EPA as a non-attainment area for dust (PM₁₀). Dust and construction equipment emissions related to construction projects downtown contribute to the PM₁₀ levels within the San Diego Air Basin. Because the San Diego Air Basin already is impacted, any new construction emissions would have a significant cumulative impact on regional air quality.

Mitigation Measures: There are no additional mitigation measures for cumulative air quality impacts related to construction emissions.

B. HISTORICAL RESOURCES (HIST)

Impacts to Historical Resources (HIST-A.1):

The demolition or substantial alteration of significant historical resources in combination with the loss of similar resources in the region would result in a cumulatively significant historical impact. Historical resources continue to be lost within San Diego County, and any loss of these resources due to buildout of the Downtown Community Plan could result in a significant cumulative impact.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative regional impacts to historical resources to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Historical resources may continue to be lost throughout San Diego County, in jurisdictions beyond the control of CCDC. No measures beyond those required by federal, state and local regulations are available to control those losses. As such, any loss of historical resources within CCDC's jurisdiction could contribute to a significant cumulative impact on historical resources.

Mitigation Measures: There are no additional mitigation measures for cumulative historical resource impacts.

Impacts to Archaeological Resources (HIST-B.1):

Impacts to important archaeological sites associated with redevelopment could combine with the loss of other important archaeological resources in the region and result in a significant cumulative impact.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative regional impacts to archaeological resources to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Any loss of archaeological resources within the Downtown Community Plan area could contribute to a cumulatively significant impact when added to the regional loss of such resources.

Mitigation Measures: No measures beyond those required by federal, state and local regulations are available to control such losses.

C. HYDROLOGY/WATER QUALITY (WQ)

Surface Water Pollution (WQ-A.1):

Since urban runoff has already adversely impacted water quality in San Diego Bay, the addition of any pollutants in urban runoff discharged into the Bay would result in a cumulatively significant impact to water quality.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative regional impacts to water quality, to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the

alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: San Diego Bay is currently experiencing water quality problems caused by urban development within its watershed. Mandatory compliance with federal state and local regulations regarding short-term and long-term control of urban runoff and erosion would serve to reduce the direct impacts of future development on hydrology/water quality. In addition, the Plan would include policies to reduce urban runoff and associated pollutants generated from future development activities. Although existing regulations, Plan policies and implementation of mitigation measures would reduce direct water quality impacts to below a level of significance, cumulative water quality impacts would be unavoidable.

No measures exist beyond those required by federal, state and local regulations, as well as any requirements imposed to comply with the goals and policies of the Downtown Community Plan, are within the control of CCDC.

Mitigation Measures: No additional mitigation measures are available for cumulative water quality impacts.

D. LAND USE COMPATIBILITY (LU)

Transient Impacts (LU-B.5):

Increased development activities downtown would combine with those expected in surrounding neighborhoods to displace homeless populations encouraging them to move into less active areas in surrounding neighborhoods.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative impacts of transient activity to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The same issues of control with respect to direct impacts of transient activity, are applicable to the likelihood of a cumulatively significant impact due to transient activity.

Mitigation Measures: No feasible mitigation measures exist.

E. NOISE (NOI)

Traffic Noise Increase (NOI-A.1)

Traffic noise increases on nine of the grid street segments would significantly increase with the addition of traffic from the proposed Community Plan in combination with other new sources of traffic. Increased automobile trips related to new development within the downtown planning area would combine with automobile trips on grid streets to cause nine segments to increase by more than 3 dB(A) or exceed 65dB(A).

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce some of the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative traffic noise impacts to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The issues regarding mitigation for traffic noise are the same as discussed in Impact NOI-C.1 and NOI-D.1. In many cases, insufficient room exists to construct a noise attenuation wall to reduce exterior traffic noise and, if feasible, the wall would only protect ground level areas. While buildings within the affected area could be retrofitted to attenuate the effects of the noise increase, implementation of such a mitigation strategy is not considered feasible.

Mitigation Measures: No feasible mitigation measures exist.

F. TRAFFIC/CIRCULATION/PARKING (TRF)

Impacts to Grid Streets (TRF-A.1.1)

The increased traffic volumes from buildout of the proposed Plan in combination with other increases in traffic would result in a significant cumulative impact on two intersections. The intersections of First Avenue and Elm Street as well as 13th Street and K Avenue would experience significant cumulative impacts.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or

alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce many of the significant environmental effects identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative traffic impacts on the street grid to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Implementation of the improvements identified in Table 5.2-21 of the EIR would potentially reduce the cumulative impacts to below a level of significance. However, as pedestrian considerations may conflict with these improvements, the impacts may not be able to be reduced to below a level of significance.

Mitigation Measures: Implementation of the improvements identified in Table 5.2- 21 of the FEIR would reduce impacts.

Impacts to Surrounding Streets (TRF-A.1.2)

The increased traffic volumes could result in significant congestion on major streets in the surrounding neighborhoods. Build-out of the proposed Downtown Community Plan in combination with other new trips on surrounding roadways would have a cumulatively significant impact on several roadways. The following street segment already operates at LOS F and would experience significant cumulative impacts as a result of buildout of downtown under the proposed Plan: 28th Street (between Harbor Drive and Broadway).

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which would reduce many of the significant environmental effects identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative traffic impacts on streets in surrounding neighborhoods to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: Implementation of roadway improvements such as restriping and/or widening may be able to reduce cumulative impacts on surrounding roadways.

Mitigation Measures: Implementation of Mitigation Measure TRF-A.1.1-1 would reduce impacts by identifying roadway improvements to be implemented.

Increased Freeway Traffic (TRF-A.2.1)

Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps. Interstate 5 between SR-94 and Pershing Drive would experience a cumulatively significant impact as would SR 163 between I-5 and Washington Avenue. The northbound onramps to I-5 at B Street and Eleventh Street would experience significant cumulative impacts as would the southbound onramp to I-5 at Grape Street.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effect identified in the FEIR. These conditions, changes or alterations may not, however, reduce cumulative impacts on freeway segments and ramps to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR. In addition, pursuant to CEQA Section 21081(a)(2), State CEQA Guidelines Section 15091(a)(2), and Local Agency Guidelines Section 411, the Council/Agency finds that other conditions, changes or alterations that would avoid or substantially reduce the significant environmental effect as identified in the FEIR are within the responsibility and jurisdiction of another public agency and not the Council/Agency. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: While CCDC and the City would be obligated by Mitigation Measure A.2.1-1 to coordinate with state and local agencies charged with providing regional transportation needs (e.g. Caltrans, SANDAG and MTS) to identify improvements and funding sources for the freeways serving downtown, construction of those improvements are beyond the control of the City of San Diego, CCDC and future development. Improvements are at the discretion of Caltrans. Although CCDC would be able to work with Caltrans to evaluate and participate in improvements that are agreed upon and shown to reduce significant impacts, neither the City nor CCDC could unilaterally implement sufficient measures to reduce those impacts to below a level of significance.

Mitigation Measures: Beyond initiating multi-jurisdictional planning efforts to identify freeway improvements and funding sources, no other feasible mitigation measures exist as constructing improvements are beyond the direct control of CCDC and the City.

Inadequate Parking Supply (TRF-D.1)

Buildout of downtown could create a significant parking impact due to the potential for demand to exceed supply in combination with new parking demand generated in the surrounding neighborhoods.

Findings: Pursuant to CEQA Section 21081(a)(1), State CEQA Guidelines Section 15091(a)(1) and Agency Local Guidelines Section 411, the Council/Agency finds that conditions, changes or alterations have been required in, or incorporated into, the Proposed Plans and Ordinance which could reduce the significant environmental effects identified in the FEIR. These conditions, changes or alterations would not, however, reduce all cumulative parking-related impacts to below a level of significance. Therefore, a finding pursuant to CEQA Section 21081(a)(3), State CEQA Guidelines Section 15091(a)(3) and Agency Local Guidelines Section 411 is being made as well, and the Council/Agency hereby also finds that there are no other feasible mitigation measures that would mitigate the impact to below a level of significance and that specific economic, social, technological or other considerations make infeasible the alternatives identified in the FEIR, as discussed in Section VI of these Findings. As described in the Statement of Overriding Considerations, the Council/Agency has determined that this impact is acceptable because of specific overriding considerations. Thus, the impacts are considered **significant and not mitigated**.

Facts in Support of Finding: The same facts underlying the finding regarding direct impacts, set forth in the analysis of Impact TRF-D.1, apply to the cumulative impacts on parking supply. The demand for parking at buildout would exceed the amount of parking supply that would be created solely from conforming to the parking requirements of the proposed PDO. While public and/or private parking facilities may be constructed to fulfill the shortfall resulting from simple compliance with the PDO parking regulations, no guarantee exists that this would occur.

Mitigation Measures: No feasible mitigation measures exist.

VI. FINDINGS REGARDING IMPACTS FOUND NOT TO BE SIGNIFICANT

Finding: The Proposed Plans and Ordinance will not have a significant impact on the following: biological resources, mineral resources, and agricultural resources.

Facts in Support of Finding: The project area is an already-developed urban setting, almost entirely lacking in native vegetation or wildlife. The ornamental vegetation that exists throughout downtown is insignificant to wildlife that would otherwise be native to the area. Due to the urbanized character of the downtown area, there are no sensitive plant or animal species identified that would be affected by the Proposed Plans and Ordinance. There will be no change

in the nature or number of plant or animal species; no introduction of new species; and no deterioration of existing habitat as a result of the Proposed Plans and Ordinance.

Further, because of the history of urbanization in the downtown area, there are no significant viable mineral or agricultural resources, nor has the area been designated as a viable source of such resources.

VII. FINDINGS REGARDING ALTERNATIVES

Because the Proposed Plans and Ordinance will cause unavoidable significant environmental effects, the Council/Agency must consider the feasibility of any environmentally superior alternative to the Proposed Plans and Ordinance, evaluating whether these alternatives could avoid or substantially lessen the unavoidable significant environmental effects while achieving most of the objectives of the Proposed Plans and Ordinance.

The objectives of the Proposed Plans and Ordinance are as follows:

- To strengthen downtown's role as the regional urban, administrative, commercial and cultural center for the metropolitan area;
- To accommodate in an urban environment a significant portion of the growth expected in the San Diego region over the coming years;
- To ensure that intense development is complemented with livability through strategies such as the development of new parks and Neighborhood Centers;
- To advance downtown's position as the regional economic and employment center, by ensuring availability of employment land, development of regional destinations, and creation of jobs easily accessed via transit, bicycle or on foot;
- To create walkable neighborhoods downtown with a mix of uses and easy access to open space, shops, services, amenities, and cultural attractions; and
- To connect downtown's neighborhoods to the waterfront with new streets and view corridors, re-establish Balboa Park's relationship to downtown, and integrate downtown with the surrounding neighborhoods.

The Proposed Plans and Ordinance would have potentially significant impacts in the following areas: Air Quality (cumulative); Cultural Resources (direct and cumulative), Land Use (direct and cumulative); Noise (direct and cumulative), Paleontological Resources (direct), Traffic and Circulation (direct and cumulative), Visual Quality (direct) and Water Quality (cumulative).

The EIR identifies one feasible alternative to the proposed Plan, which is to follow the existing plan adopted in 1992. As the proposed Plan constitutes a revision of the existing plan, the Guidelines require discussion of this existing plan as the "no project" alternative. Guidelines

§15126.6(e)(3)(A). The EIR does not identify any other feasible alternatives. The reason for this limited discussion of alternatives is that there are no other reasonable alternatives to the proposed Plan, that would “avoid or substantially reduce” the significant environmental effects of the proposed Plan as required by CEQA. As described in the EIR, the proposed Plans and Ordinance would produce a downtown residential population of 89,000 at buildout; under the existing plan, the residential population at buildout would be around 48,000. Based on these projections and a comparison of other uses contemplated under both plans, the EIR demonstrates that the significant impacts resulting from the proposed Plan would also occur under the existing Plan. As illustrated in Table 10.1-2 of the EIR, none of the significant impacts resulting from the proposed Plan would be avoided or substantially reduced by choosing instead to continue with the existing plan. This table shows that in all respects, impacts that are significant under the proposed Plan are also significant under the existing plan. Although some of the impacts under the 1992 plan would be quantitatively less than those under the proposed Plan, the impacts themselves remain environmentally significant under either scenario. Working with the community over a more than three-year period, and in the months since, staff has not been able to identify any alternative that would substantially reduce the impacts identified. Nor have any alternatives been identified in CCDC’s environmental analysis or in the comments submitted in response to the draft Plan EIR that would: (1) meet most of the project’s basic objectives, (2) be feasible, as CEQA defines the concept, and (3) eliminate or substantially reduce the significant impacts identified in the Plan EIR. Under the circumstances of this Plan, including downtown’s physical configuration and limitations, the existing state of development, and the mandates of the City’s Strategic Framework (along with the clear expectations of the community), there are no other alternatives meeting the requirements of the Guidelines. As such, the identification of only one alternative is reasonable.

As discussed below, the Council/Agency has considered and rejects the No Project. The Council/Agency finds that the Proposed Plans and Ordinance best meet the objectives of the project with the least environmental impact.

No Project Alternative: Continued Implementation of Existing Centre City Community Plan

This alternative would retain the Centre City Community Plan that was adopted in 1992, including the related Planned District Ordinances. The 1992 Plan and related ordinances contain a series of goals, policies and regulations intended to promote a diverse mix of land uses within downtown. The key features of the 1992 Plan are set forth in the FEIR at pages 5.1-6 and 5.1-7.

Finding: The Council/Agency finds that specific economic, legal, social, technological, or other considerations make infeasible the No Project: Continued Implementation of Existing Centre City Community Plan alternative identified in the FEIR.

Facts in Support of Finding: Many of the objectives of the Proposed Plans and Ordinance are the same or similar to those articulated in the 1992 Plan. Both plans envision a diverse mix of land uses (including residential, office, hotel and retail), increasing employment and housing opportunities,

and the creation of open space. However, the 1992 Plan envisioned a less-intensive scope of development. Under that plan, residential population at buildout would be little more than half of that contemplated by the Proposed Plans and Ordinance; employment positions would be just 74% of those under the Proposed Plans and Ordinance; retail square footage would just over two-thirds of that which will be provided under the Proposed Plans and Ordinance; and there would be nearly 4,000 fewer hotel rooms. As important, the 1992 Plan did not focus residential uses around neighborhood centers, place the same emphasis on pedestrian- and bicycle-friendly facilities, or provide for as much open space as will the Proposed Plans and Ordinance.

Despite the less intense development proposed under the 1992 Plan, most of the significant impacts predicted under the Proposed Plans and Ordinance would also occur (or not occur) under the 1992 Plan. Except for traffic and visual quality impacts, the environmental results of buildout under either the Proposed Plans and Ordinance or the 1992 Plan are essentially equivalent (FEIR, Table 10.1-2). As this table shows, even where these impacts under the 1992 Plan would be less intense than under the Proposed Plans and Ordinance, they would remain significant (see, e.g., all Traffic and Circulation impacts). Further, the 1992 Plan did not incorporate the smart growth principles that are intended to reduce reliance on the private automobile, which in turn could reduce the identified traffic impacts more efficiently than if the Council/Agency proceeded under the 1992 Plan.

San Diego's efforts to redevelop and revitalize its downtown began in 1972 with the establishment of the Horton Plaza redevelopment project area. Subsequent Plans and Ordinance, including the 1992 Plan, did much to advance the same objectives that are now the focus of the Proposed Plans and Ordinance. However, after a three-year public process that involved consideration of development trends, changes in demand and new opportunities that have arisen in the past decade, the proposed Downtown Community Plan was developed. The Proposed Plans and Ordinance now contemplate a far more intense level of development that will both (1) foster a vibrant urban core for the City and region, and (2) help curtail urban sprawl caused by an increasing size and diversity of population. At the same time, they more completely implement the objective of establishing neighborhoods and open spaces within downtown.

While the 1992 Plan aims to promote some of the same objectives as the Proposed Plans and Ordinance, it is infeasible because it does not allow for the same advanced approaches to economic and employment growth, neighborhood development, and realization of the benefits of a fully-developed, vibrant urban core.

VIII. FINDINGS REGARDING GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires that an EIR:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

Finding: As discussed in Chapter 7.0 of the FEIR, one of the primary goals of the Downtown Community Plan is to encourage growth in the downtown area, to revitalize the downtown area. Growth in the downtown area will result in a positive impact because it will generate revenues that can fund improvements in infrastructure, the development of affordable housing and other benefits.

IX. FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) indicates that “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” The State CEQA Guidelines also indicate that that “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” As referenced in the FEIR, the Proposed Plans and Ordinance would not have any significant irreversible impacts on biological, agricultural or mineral resources, as the downtown area is already substantially developed in an urban state and such resources are not significantly located in the area.

While no water bodies are located within the downtown area, cumulative impacts from runoff would have a significant and irreversible impact on the adjacent San Diego Bay. Energy resources would be used both in the construction and the occupancy of new development under the Plan, although the increase in availability of transit facilities may serve to reduce consumption of gasoline associated with the increases in trips in and out of downtown.

The FEIR acknowledges that other nonrenewable resources (e.g. lumber, sand, gravel, metals and water) would inevitably be consumed in the course of construction contemplated under the Plan, and, in the long-term, use and occupancy of the new development. However, use of such resources would have an incremental impact on the regional consumption of such resources.

The FEIR also acknowledges that the loss of both cultural and paleontological resources would occur in the course of development, and that such losses would in some instances be irreversible, notwithstanding monitoring and salvage measures intended to reduce such impacts.

X. FINDINGS REGARDING OTHER CEQA CONSIDERATIONS

The Council/Agency are the “Lead Agency” for the Proposed Plans and Ordinance evaluated in the FEIR. The Council/Agency finds that the Draft FEIR and the FEIR were prepared in compliance with CEQA and the CEQA Guidelines. The Council/Agency finds that it has independently reviewed and analyzed the Draft FEIR and FEIR for the Proposed Plans and Ordinance, that the Draft FEIR which was circulated for public review reflected its independent judgment, and that the FEIR reflects the independent judgment of the Council/Agency.

The Notice of Preparation of the Draft FEIR was published on April 1, 2003. It requested that responsible agencies respond as to the scope and content of the environmental information germane to that agency’s specific responsibilities.

The public review period for the Draft FEIR began on July 28, 2005 and the Draft FEIR and appendices were available for public review on that date. A Notice of Availability of Draft FEIR was filed with the County Recorder/County Clerk on July 28, 2005 and a Notice of Completion of Draft FEIR was submitted to the State Clearinghouse on July 28, 2005. The 45-day public review and comment period ended on September 12, 2005.

The Draft FEIR and appendices were available for public review at that time. On October 13, 2005, CCDC distributed the FEIR and provided proposed written responses to the responsible agencies. This was at least fourteen calendar days prior to certification of the FEIR. On November 15, 2005 public hearings were held before the Council/Agency to consider approval of the Proposed Plans and Ordinance and certification of the FEIR.

The Council/Agency finds that the FEIR provides objective information to assist the decision-makers and the public at large in their consideration of the environmental consequences of the Proposed Plans and Ordinance. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The FEIR was prepared after the review period and responds to comments made during the public review period.

The Council/Agency evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Council/Agency prepared written responses describing the disposition of significant environmental issues raised. The FEIR provides adequate, good faith and reasoned responses to the comments. The Council/Agency reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft FEIR. The lead agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these Findings, concerning the environmental impacts identified and analyzed in the FEIR.

The FEIR evaluated the following areas for direct and cumulative impacts: Land Use and Planning; Transportation Circulation, Access and Parking; Cultural Resources; Public Facilities and Services; Geology and Seismicity; Aesthetics and Visual Quality; Noise; Air Quality; Hydrology and Water Quality; Hazardous Materials; Population and Housing; Paleontological Resources; Energy; Biological Resources; Mineral Resources; and Agricultural Resources. Additionally, the FEIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts of the Project. All of the significant environmental impacts of the Proposed Plans and Ordinance were identified in the text and summary of the FEIR. The significant environmental impacts of the Proposed Plans and Ordinance and the alternatives also were identified in the FEIR.

The mitigation measures which have been identified for the Proposed Plans and Ordinance were identified in the text and summary of the Draft EIR. The final mitigation measures are described in the MMRP, contained in the FEIR. Each of the mitigation measures identified in the MMRP, contained in FEIR is incorporated into the Proposed Plans and Ordinance. The Council/Agency

finds that the impacts of the Proposed Plans and Ordinance have been mitigated to the extent feasible by the Mitigation Measures described in the FEIR and identified in the MMRP.

Textual refinements and errata were compiled and presented to the decision-makers for review and consideration. The Council/Agency staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with the review of the Proposed Plans and Ordinance. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents will require clarifications and corrections. Second, textual clarifications were necessitated in order to describe refinements suggested as part of the public participation process. Additionally, the responses to the comments on the Draft EIR, which are contained in the FEIR, clarify and amplify the analysis in the Draft EIR.

Having reviewed the information contained in the Draft EIR and FEIR and in the administrative record as well as the requirements of CEQA, the State CEQA Guidelines and the Local Agency Guidelines regarding recirculation of Draft EIRs, and having analyzed the changes in the Draft EIR which have occurred since the close of the public review period, the Council/Agency finds that there is no new significant information in the FEIR and finds that recirculation of the Draft EIR is not required.

The Council/Agency finds that the FEIR was presented to the City Planning Commission, and that the City Planning Commission reviewed and considered the information contained in the FEIR prior to taking action to recommend approval of the Proposed Plans and Ordinance and certification of the FEIR.

CEQA requires the lead agency approving a project to adopt a mitigation monitoring and reporting program for the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with project implementation. The mitigation monitoring and reporting program included in the FEIR as certified by the Council/Agency serves that function. The mitigation monitoring and reporting program includes all of the mitigation measures identified in the FEIR and has been designed to ensure compliance during implementation of the Proposed Plans and Ordinance. In accordance with CEQA, the mitigation monitoring and reporting program provides the measures to ensure that the mitigation measures are fully enforceable.

The Council/Agency is certifying a FEIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the FEIR as comprising the "Proposed Plans and Ordinance." It is contemplated that there may be a variety of actions undertaken by other State and local agencies (who might be referred to as "responsible agencies" under CEQA). Because the Council/Agency is the lead agency for the Proposed Plans and Ordinance, the FEIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other State and local agencies to carry out the Proposed Plans and Ordinance.

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**STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE
CITY COUNCIL OF THE CITY OF SAN DIEGO AND
THE REDEVELOPMENT AGENCY OF THE CITY OF SAN DIEGO
CERTIFYING FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE PROPOSED
SAN DIEGO DOWNTOWN COMMUNITY PLAN, CENTRE CITY PLANNED
DISTRICT ORDINANCE AND THE 10th AMENDMENT TO THE
REDEVELOPMENT PLAN FOR THE CENTRE CITY REDEVELOPMENT PROJECT**

The City Council of the City of San Diego and the Redevelopment Agency of the City of San Diego (“Council/Agency”) adopt and make this Statement of Overriding Considerations concerning the unavoidable significant impacts of implementing the San Diego Downtown Community Plan, Centre City Planned District Ordinance and 10th Amendment to the Redevelopment Plan for the Centre City Redevelopment Project (the “Proposed Plans and Ordinance”). Those unavoidable significant impacts are identified in the Final Environmental Impact Report (“FEIR”) and the Findings made by the Council/Agency in connection with the FEIR, all of which are incorporated into this Statement of Overriding Considerations by this reference.

The Proposed Plans and Ordinance will bring substantial benefits to the City of San Diego and the downtown redevelopment area, including strengthening downtown’s role as the regional residential, administrative, commercial and cultural center for the metropolitan area; accommodating in an urban environment a significant portion of the growth expected in the San Diego region over the coming years; ensuring that intense development is complemented with livability through strategies such as the development of new parks and Neighborhood Centers; advancing downtown’s position as the regional economic and employment center, by ensuring availability of employment land, development of regional destinations, and creation of jobs easily accessed via transit, bicycle or on foot; creating walkable neighborhoods downtown with a mix of uses and easy access to open space, transit, shops, services, amenities, and cultural attractions; and connecting downtown’s neighborhoods to the waterfront with new streets and view corridors, re-establishing Balboa Park’s relationship to downtown, and integrating downtown with the surrounding neighborhoods.

The Council/Agency finds that the Proposed Plans and Ordinance unavoidable significant impacts are acceptable in light of the Proposed Plans and Ordinance benefits. Each benefit set forth below constitutes an overriding consideration warranting approval of the Proposed Plans and Ordinance, independent of the other benefits and despite each and every unavoidable impact:

1. Develop downtown as the primary urban center for the region. One of the foundational conclusions reached by the Steering Committee during its three-year process was that downtown should be developed as a vibrant, urban center for the region. The 1992 Community Plan had some of the same goals as the proposed Plan, but lacked the mandate for intense development which promoted a lively, 24-hour downtown environment while at the same time balancing residential, commercial and recreational uses. The new Plan re-focuses the residential development efforts on specific, comprehensive neighborhood centers including shops, services,

employment and recreational opportunities, open spaces and transit facilities; all of which would be located within walking distance of the residential developments. Commercial and entertainment areas will balance and complement the neighborhoods, and all will be connected by pedestrian and bicycle friendly routes.

Because of the limited amount of vacant land available for development, the Plan notes that most of the intensified development will involve the redevelopment of existing structures and uses. The Plan coordinates these efforts to ensure the efficient use of the available land.

2. Maximize employment opportunities within the downtown area. The Steering Committee determined that downtown should be the region's premier employment center. To ensure this goal is achieved, the Plan requires the development of employment-generating uses over a large part of the core area, and also incentivizes retail and other commercial uses throughout downtown that will add to employment opportunities. Transit facilities located throughout downtown will make it easier for employers to attract and retain a workforce from within the downtown neighborhoods.

3. Develop full-service, walkable neighborhoods linked to the assets downtown offers. The Plan recognizes that parts of downtown are already characterized by built-out neighborhoods, while others areas are just beginning to undergo the transformation. Under the Plans and Ordinance, all neighborhoods in the downtown area are designed to require no more than a ten-minute walk from one end (or side) of the district to the other. All neighborhoods will have residential units, retail, employment opportunities, civic or cultural resources, open spaces and local services components. Several different aspects of the Proposed Plans and Ordinance are coordinated to provide for the development of these full-service neighborhoods, including elements governing the types of uses, the size, location and articulation of buildings, and the development of circulation routes that will protect pedestrian activity while allowing for ease of movement between points of interest, such as the waterfront and Balboa Park, in and adjacent to the various neighborhoods.

4. Increase and improve park and public spaces. Building on the existing public parks and spaces in downtown, the Plan contemplates a total of up to 131 acres of public open spaces, plus numerous additional pocket parks and plazas. Allowing parking underneath these open spaces will facilitate their development and respond to the parking needs of downtown. Further, and consistent with the development of downtown as a collection of self-contained neighborhoods, the open spaces will be connected by pedestrian paths and green streets with wide sidewalks and rich landscaping to encourage their use. In addition to the public open spaces, the Plan will require residential developments to include their own private open spaces for residents to enjoy.

5. Maximize the advantages of downtown's climate and waterfront setting. As a premier tourist and convention destination, San Diego has already seen the benefits of maximizing its outdoor settings and assets. The elements of the Plan that require ample open spaces and connections for walking between neighborhood centers in the downtown area will take advantage of the city's weather and waterfront activities. Re-opening some of the grid system streets to the waterfront will enhance the value of the various dining, recreational and commercial uses already

located at the waterfront, and coordination with the North Embarcadero Visionary Plan will ensure that the network of pedestrian and bicycle friendly routes will extend all the way to the waterfront throughout the downtown area where possible. Maintenance and enhancement of view corridors to the waterfront will add to the aesthetic appeal and value of the downtown area.

6. Implement a coordinated, efficient system of vehicular, transit, bicycle and pedestrian traffic. The Plan recognizes that the existing grid system of streets is practical and functional. However, as part of the emphasis on developed Neighborhood Centers, and easy pedestrian connectivity between them, the Plan includes several physical changes that will help define the neighborhoods and reinforce the intended uses of the retail, commercial services development allowed by the Plan.

7. Integrate historical resources into the new downtown plan. Redevelopment in the downtown area has already preserved and reused several historical buildings that appear on the National, State and Local Registers. The Plan continues and enhances the preservation of such structures, where feasible, and calls for the integration of features that reflect San Diego's heritage in new development. The Plan provides incentives for rehabilitation and reuse of historic structures. Historic districts, both established and proposed, will also contribute to the preservation of San Diego's heritage.

8. Facilitate and improve the development of business and economic opportunities located in the downtown area. The Plan acknowledges that significant economic benefits will flow from making the downtown area a friendly place for businesses to locate and operate. In addition to employment opportunities, downtown businesses will attract customers and visitors that bring revenue to the city as well as to the businesses. The emphasis on developing full-service residential neighborhoods will attract commercial and retail operations focused on serving those residents; additionally, the improved connections between neighborhoods and commercial/business centers will help businesses located downtown thrive. By requiring certain sites to provide employment opportunities, the Plan also ensures that portions of downtown will be available for business.

9. Integrate health and human services into neighborhoods within downtown. Downtown's population includes seniors, low-income wage earners, disabled and transient populations that benefit from a wide variety of human services. Those services have been disproportionately geographically concentrated in certain areas of downtown, as other areas have been redeveloped. Some of those most urgently needed care facilities also currently lack a comprehensive array of services that would reduce the impacts of the service providers on the surrounding areas. The Plan encourages multi-use facilities that will provide on-site the wide range of services needed by their clients. The Plan also locates many of these facilities within the various neighborhoods, allowing the residents and employees at those facilities complete access to the amenities of the neighborhood, including easier access to transit. Clusters of human service facilities will not be permitted any longer, so that the impacts of such facilities can be dispersed and reduced accordingly.

10. Encourage a regular process of review to ensure the Plan and related activities are best meeting the vision and goals of the Plan. The rapid pace of downtown development, however, means that conditions change from year to year, which in turn may require amendments to the Plan to keep it responsive to the needs and desires of downtown's residents, businesses and visitors. The Plan expressly urges a review at no greater than five-year intervals. By articulating the need for such reviews, the Plan provides guidance and direction to the people implementing it, and a regular forum for interested parties to voice their ideas, suggestions and concerns about the continued implementation of the plan through buildout.