The City of SAN DIEGO

Final Program Environmental Impact Report for the North Park and Golden Hill Community Plan Updates

Project No. 380611

Sch No. 2013121076

September 2016

The City of SAN DIEGO
Planning Department
Environmental & Policy Analysis Division

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2013121076

SUBJECT: **NORTH PARK AND GOLDEN HILL COMMUNITY PLAN UPDATES: CITY COUNCIL APPROVAL AND ADOPTION of an update to the North Park Community Plan; Adoption of an update to the Golden Hill Community Plan; Adoption of General Plan Amendments; Adoption of the Golden Hill Impact Fee Study; Adoption of the North Park Impact Fee Study; Amendments to the Land Development Code; and Rezoning of the Community Plan areas with Citywide zones.**

FINAL DOCUMENT September xx, 2016:

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

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

BACKROUND:

The proposed North Park and Golden Hill Community Plan Updates (proposed CPUs) would be consistent with and incorporate relevant policies from the 2008 City of San Diego General Plan, as well as provide a long-range, comprehensive policy framework for growth and development in the North Park and Golden Hill communities. The North Park and Golden Hill Community Plans were originally adopted in in 1986 and 1988, respectively. North Park was last amended in 2003 and the Golden Hill has not been amended since adoption. Separate plans are being prepared for the North Park and Golden Hill communities, and would be evaluated in a single PEIR.

The North Park Community Plan Update can be found on the Planning Department's website at:

https://www.sandiego.gov/planning/community/profiles/greaternorthpark

The Golden Hill Community Plan Update can be found on the Planning Department's website at:

https://www.sandiego.gov/planning/community/profiles/greatergoldenhill

The proposed North Park and Golden Hill CPUs provide detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, the prioritization and provision of public facilities,

community and site specific urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the North Park and the Golden Hill communities.

CPU implementation requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; adoption of a Land Development Code (LDC) ordinance that would repeal the Golden Hill Planned District Ordinance (GHPDO) zoning; amendments to the LDC to remove North Park from the Mid-City Planned District Ordinance (MCPDO); amendments to the LDC to rezone the area located in the Golden Hill and North Park Community Planning Areas from the Golden Hill Planned District and Mid-City Communities Planned District to Citywide zoning; adoption of LDC amendments to allow for implementation of the community plan policies; amendments to the Neighborhood Development Permit regulations to include Supplemental Design Regulations for Potential Historic Districts; and a comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new impact fee for each community.

North Park Community Plan Update

The North Park Community Plan area is an urbanized community consisting of approximately 2,300 acres. It is located in the central portion of the City of San Diego and is in close proximity to Downtown San Diego. North Park abuts the community planning areas of Uptown on the west, Mission Valley on the north, City Heights and Normal Heights on the east, and Golden Hill and Balboa Park on the south. North Park is defined by its mesa tops with canyon and hillside areas. The majority of North Park is relatively flat or gently sloping with pronounced hillside areas located in the northern boundary of the community adjacent to Mission Valley and the southeastern portion of the community adjacent to Golden Hill.

Golden Hill Community Plan Update

The Golden Hill Community Plan area is an urbanized community consisting of approximately 750 acres. It is located in the central portion of the City of San Diego. Golden Hill abuts the community planning areas of Downtown San Diego on the west, City Heights on the east, North Park on the north, Southeastern San Diego on the south, and Balboa Park on the west and north. The majority of Golden Hill is gently sloping with pronounced hillside areas located in the eastern boundary of the community adjacent to City Heights and North Park.

Applicant: City of San Diego Planning Department

ENVIRONMENTAL DETERMINATION:

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA). The analysis conducted identified that the project could result in significant impacts to the following issue area(s): **Transportation and Circulation, Air Quality (North Park only), Noise (Ambient Noise and Construction), Historical Resources (Built Environment and Historic Districts), and Paleontological Resources (Ministerial Projects).**

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

PUBLIC REVIEW DISTRIBUTION:

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

FEDERAL GOVERNMENT
U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife (23)
U.S. Army Corps of Engineers (26)

STATE OF CALIFORNIA
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California Department of Fish and Wildlife (32)
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State Clearinghouse (46A)
California Coastal Commission (47)
California Air Resources Board (49)
California Transportation Commission (51)
California Department of Transportation (51A)
California Department of Transportation (51B)
California Native American Heritage Commission (56)

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County of San Diego Department of Planning and Land Use (68)
County Water Authority (73)

CITY OF SAN DIEGO
Mayor's Office (91)
Council President Lightner, District 1
Councilmember Zapf, District 2
Councilmember Gloria, District 3
Councilmember Cole, District 4
Councilmember Kersey, District 5
Councilmember Cate, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Council President Pro Tem Emerald, District 9
Planning Department
- K. Steinert
- A. Muto
- J. Murphy
- L. Gates
- B. Turgeon
- T. Galloway
- N. Bragado
- H. Greenstein
- G. Ghossain
- S. Hajjiri

Planning Department – cont.
- D. Russell
- R. Malone
- M. Herrmann
- S. Osborn

E. Vivero Ocampo
F. January
S. Mercer
K. Stanco
S. Morrison
M. Blake

Development Services Department
A. McPherson
J. Quinn

Transportation and Stormwater Department
M. Stephens

CITY OF SAN DIEGO - continued
Fire and Life Safety Services (79)
San Diego Fire – Rescue Department Logistics (80)
Library Department (81)
Central Library (81A)
North Park Branch Library (81T)
University Heights Branch Library (81JJJ)
Historical Resources Board (87)
Park & Recreation (89)
Wetlands Advisory Board (91A)

OTHER INTERESTED GROUPS, ORGANIZATIONS, AND INDIVIDUALS
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San Diego County Regional Airport Authority (110)
Metropolitan Transit System (112)
San Diego Gas & Electric (114)
Metropolitan Transit System (115)
San Diego Unified School District (132)
Sierra Club (165)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
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Endangered Habitats League (182A)
Citizens Coordinate for Century 3 (179)
Carmen Lucas (206)
South Coast Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
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Native American Distribution (225A-S)
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North Park Community Planning Group - Robert Barry (363)
Golden Hill Community Planning Group (259)
Friends of Switzer Canyon (260)

North Park Community Association (366)
UCSD Physical & Community Planning (478)
Middletown Property Owner's Association (496)
Barry Hager, MISSION HILLS HERITAGE (497)
Hillside Protection Association (501)
Banker's Hill Canyon Association (502)
Greater Golden Hill Community Development Corporation
Climate Action Campaign
Walt Scott Chambers
Sharon L. Gehl
David Swarens
Ernestine Bonn
Cheryl Brierton
Katherine Hon
John Kroll
Ruchell Alvarez
Adams Avenue Business Association
Angela Landsberg
Kitty Calen
Cheryl Dye
George Franck
Kristin Harms
Katherine Hon
Scott Kessler
Angela Landsberg
Richard Lewis
Susan Riggs-Tinsky
Rob Steppke
Lynn Susholtz
Gary Weber
Ruchell Alvarez
Richard Baldwin
Cheryl Brierton
Susan Bugbee
Michael Burkart
Janice Davis
John Kroll
Richard Santini
Pat Shields
David Strickland
David Swarens
Matt Thomas
Angela Vasconcellos
Kathryn Willitts
Mark Kratzschmar
Connie McDonough
Skillman
Kathy Vandenheuvel
David Caldwell
Susanna Starcevic
Carole Caffey
Alex Hempton
Jon Stamatopoulos

RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

(X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Alyssa Muto, Deputy Director
Planning Department

May 31, 2016
Date of Draft Report

September 8, 2016
Date of Final Report

Analyst: Kurtis Steinert, AICP / Denise Russell

North Park and Golden Hill Community Plan Updates PEIR
Letters of Comment and Responses

Letters of comment to the Draft PEIR were received from the following agencies, organizations, and individuals. Several comment letters received during the Draft PEIR public review period contained accepted revisions that resulted in changes to the final PEIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

A1 California Public Utilities Commission RTC-2
A2 California Department of Transportation RTC-3
A3 Metropolitan Transit System RTC-8
A4 San Diego Unified School District RTC-11
A5 San Diego Association of Governments RTC-12
A6 State of California Governor's Office of Planning and Research RTC-18

B1 Climate Action Campaign (Coast Law Group LLP) RTC-24
B2 Environmental Justice League (DeLano & DeLano) RTC-33
B3 North Park Historical Society RTC-53
B4 North Park Planning Committee RTC-81
B5 Rincon Band of Luiseno Indians RTC-110
B6 San Diego Canyonlands RTC-111
B7 San Diego County Archaeological Society, Inc. RTC-113
B8 Save Our Heritage Organisation (Brandt-Hawley Law Group) RTC-114
B9 South Park Business Group RTC-119

C1 Blackson, Howard M. RTC-120
C2 Brierton, Cheryl RTC-126
C3 Chammas, Sam RTC-128
C4 Coleman, Chelsea RTC-129
C5 Cruz, Manny RTC-130
C6 d'Elgin, Tershia RTC-132
C7 Eddings, Ryan RTC-136
C8 Gardiol, Richard RTC-139
C9 Gruby, Michael RTC-141
C10 Gutierrez, Vernita RTC-143
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C12 Kaminski, Charles RTC-150
C13 Kaminski, Charles RTC-152
C14 Serocki, Melissa RTC-154
C15 Sevier, Paula RTC-156
C16 Sims, Ethel & Thomas RTC-158
C17 Swarens, David RTC-167
C18 Vita, Randi RTC-176
C19 Vita, Randi (DeLano & DeLano) RTC-182

Letter A1

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

July 26, 2016

Kurtis Steinert
City of San Diego
1010 Second Avenue, MS 413
San Diego, CA 92101

Dear Kurtis:

Re: SCH 2013121076 San Diego (SAN DIEGO) North Park and Golden Hill Community Plan Update - DEIR

A1-1 The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission Rail Crossings Engineering Branch (RCEB) has received the *Draft Environment Import Report (DEIR)* from the State Clearinghouse for the proposed City of San Diego (City) North Park and Golden Hill Community Plan Update project.

A1-2 According to the DEIR, the project area includes active railroad tracks. RCEB recommends that the City add language to the North Park and Golden Hill Community Plan Update so that any future development adjacent to or near the rail right-of-way (ROW) is planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade crossings. This includes considering pedestrian circulation patterns or destinations with respect to railroad ROW and compliance with the Americans with Disabilities Act. Mitigation measures to consider include the planning for grade separations for major thoroughfares, improvements to existing at-grade crossings due to increase in traffic volumes, and continuous vandal resistant fencing or other appropriate barriers to prevent trespassers onto the railroad ROW.

If you have any questions in this matter, please contact me at (213) 576-7076, ykc@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

C: State Clearinghouse

A1-1 Comment noted. The City appreciates the California Public Utility Commission's (CPUC's) participation in the public review comment process and acknowledges the CPUC's jurisdiction over highway-rail crossings (crossings).

A1-2 The City appreciates the CPUC's concern for rail crossing safety. However, there are no railroad crossings within the North Park and Golden Hill CPU areas. The North Park Community Plan identifies planned transit facilities to serve the community, including streetcar and trolley lines (see Figure 6.3-3), which would be subject to the City's General Plan Policy ME-B.9, which calls on the City to make transit planning an integral part of the development review process, including addressing rail corridor safety in the design of development adjacent to or near railroad rights-of-way. SANDAG is responsible for planning, engineering, and building the region's public transportation network, while MTS is responsible for the network operations, service planning, scheduling, and performance monitoring. Any future transit facilities that are proposed in the community will require appropriate review to ensure safety and functionality, prior to their implementation. In addition, Policy ME-3.4 of the proposed North Park CPU states, "Implement focused intersection improvements to provide safety and operations for all modes at major commercial intersections and destinations in the community and to and from Balboa Park," which would aid in ensuring safe crossings where applicable in the future.

Letter A2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
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July 21, 2016

11-SD-VAR
(5, 805, 15, 94)
Draft Program Environmental Impact Report
for the North Park and Golden Hill
Community Plan Updates
DPEIR May 31, 2016
SCH No. 2013121076

Mr. Kurtis Steinert
Senior Environmental Planner
City of San Diego
Planning Department
1010 Second Avenue, MS 413
San Diego, CA 92101

Dear Mr. Steinert:

A2-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of San Diego's (City) North Park and Greater Golden Hill Community Plan Updates (proposed CPUs), areas served by Interstate 5 (I-5), Interstate 8 (I-8), Interstate 805 (I-805), State Route 15 (SR-15), State Route 163 (SR-163), and State Route 94 (SR-94). The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

A2-2 Caltrans has reviewed the Draft Program Environmental Impact Report (DPEIR) for the North Park and Golden Hill Community Plan Updates (CPU) dated May 31, 2016, and has the following comments:

Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled and the number of trips. Caltrans strongly encourages local agencies to work towards a safe, functional, interconnected, multi-modal system.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

A2-1 Comment noted. This is an introductory comment. The City appreciates the California Department of Transportation's (Caltrans) participation in the public review comment process and acknowledges Caltrans' stake in the transportation network serving the proposed CPUs.

A2-2 Comment noted. This is also an introductory comment. The City shares Caltrans' encouragement for local agencies to work towards a safe, functional, interconnected, multi-modal system.

Mr. Kurtis Steinert
July 21, 2016
Page 2

A2-3 **DPEIR**

Caltrans does not agree with statement in the DPEIR that "No Mitigation measures are identified for impacts to freeways because freeway improvements are not within the authority of the City" (Page 6.3-46). The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds or "fair share" become available to ensure that the capacity of on-/off-ramps is adequate. In addition, potential transit mitigation for development impacts should also be analyzed, such as improved transit accommodation through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements that can improve mobility and alleviate traffic impacts to State facilities.

A2-4 **Traffic DPEIR**

1. Any ramp interchange that is proposed to be signalized needs to follow Intersection Control Evaluation (ICE) process per Caltrans Traffic Operations Policy Directive #13-02.
   a. See Caltrans's "ICE Process Informational Guide" http://www.dot.ca.gov/trafficops/ice.html.

A2-5 2. Table S-1; TRANS 6.3-6 (Impact 6.3-6): The intersection geometry will not allow the proposed mitigation of turning the NB I-805 two-lane off-ramp into a four lane termini. This would create conflict for the WB University Avenue left-turn movement onto the NB I-805 onramp. Tee-ing off the intersection so that all angles are at 90 degrees would help this mitigation but the City would have to take Caltrans Right-of-Way (R/W) from corner local businesses.

A2-6 3. Table S-1; TRANS 6.3-7 (Impact 6.3-7): We have recently reviewed the the Traffic Signal Warrant Analysis for SB I-805 Ramp Intersection with North Park Way/ Boundary Street/ 33rd Street per University Ave Mobility Plan (UAMP) and found the following:
   a. Installation of a traffic signal at SB I-805 Ramp Intersection with North Park Way/ Boundary Street/ 33rd Street would result in queues exceeding the current available storage. This would create a direct impact to the SB I-805 mainlanes.
      i. First an ICE evaluation needs to be performed evaluating the signal versus other types of intersection controls.
      ii. The proposed signal analysis findings are that if this location was to be signalized then an addition lane would have to be constructed on the SB I-805 off-ramp to create storage and mitigate the queue impact created by the signal. Queuing on this off-ramp results in weaving issues and speed differentials on our mainlanes, as well as impacts to the SB I-805 on-ramp from El Cajon Boulevard auxiliary lane. The length of this left turn lane would possibly impact the University Avenue bridge abutment wall.
      iii. The proposed widening of the SB I-805 on-ramp from North Park Way/ Boundary Street/ 33rd Street would most likely trigger a ramp meter with HOV lane to be constructed.

A2-7 4. Table S-1; TRANS 6.3-30 & 31: Include Bus on shoulder future projects.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

A2-3 Section 15126.4 of the CEQA Guidelines states that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments, or otherwise incorporated into the associated plan or policy. Impacts to freeways were considered significant and unavoidable because freeways are beyond the City's full control and the City would not be able to enforce or carry out freeway improvements. However, policies are included in the proposed CPUs to ensure freeway improvements are made as needed:

- Proposed North Park CPU Policy ME-3.5: Coordinate with Caltrans and SANDAG to identify and implement needed freeway and interchange improvements at North Park Way.
- Proposed Golden Hill CPU Policy ME-3.4: Improve street and freeway environment and trip efficiency through the installation and maintenance of street signs, including wayfinding signs, and other appropriate measures.
- Proposed Golden Hill CPU Policy ME-3.7: Coordinate with Caltrans and SANDAG to implement needed freeway and interchange improvements along SR-94 and SR-15 to improve accessibility to regional facilities and enhance active transportation modes along freeway interchanges.

This comment also suggests incorporating transit mitigation for development impacts. The Final PEIR has been revised to recognize that project-level impacts can be partially mitigated through consistency with proposed CPU policies such as transportation demand management (TDM) measures that encourage carpooling and other alternative means of transportation. As discussed in Section 6.3, Transportation and Circulation – North Park, and Section 7.3, Transportation and Circulation – Golden Hill, the proposed CPUs and associated discretionary actions would support implementation of transit improvements identified in SANDAG's RP by prioritizing the transit system and improving efficiency of transit service. Both proposed CPUs include policies intended to improve bicycle, pedestrian, and transit networks in the CPU areas. Language has also been added to recognize that City will continue to coordinate with Caltrans and SANGAG, as future project-level developments proceed, to develop potential "fair share" multi-modal mitigation strategies for freeway impacts, as appropriate.

A2-4 This comment provides information on the regulatory process required for signalizing a ramp interchange, which applies to mitigation measure TRANS 6.3-7 of the PEIR that requires the North Park Way/I-805 SB Ramps and Boundary Street/33rd Street intersection be signalized. A discussion of the Intersection Control Evaluation process has been added to Section 5.3.2.1, Caltrans, of the Final PEIR to inform the regulatory framework.

A2-5 This comment makes reference to measure TRANS 6.3-6 identified by the Traffic Impact Study. However, as discussed in the introductory language for this measure in Section 6.3.5 Mitigation Framework, this measure was not carried forward as recommended mitigation due to inconsistency with the overall mobility vision and other policies of the North Park CPU. Thus, implementation of the measure described as TRANS 6.3-6 is infeasible, but the PEIR provides the measure in an effort to disclose what could be done to reduce the significant impact.

A2-6 This comment makes reference to mitigation measure TRANS 6.3-7, which is recommended as part of the North Park CPU. The City appreciates Caltrans' comments regarding signalizing this intersection, which is included in the University Avenue Mobility Project (evaluated under a separate environmental document). The University Avenue Mobility Project will not begin construction until Caltrans authorization is obtained, and the Intersection Control Evaluation (ICE) process is completed. The appropriate design revisions to reduce potential mobility conflicts resulting from signalization of this intersection will be identified through these regulatory processes.

A2-7 Measures TRANS 6.3-30 and TRANS 6.3-31 were identified in SANDAG's Regional Transportation Plan (RTP), but are not proposed to be included with the North Park CPU due to the City's lack of full control over freeway improvements, as described in the introductory language for these measures in Section 6.3.5, Mitigation Framework.

A2-8 **APPENDIX B: TIS Comments:**

1. Figure 3-6: Existing Peak Hour Volumes (PHV) table: Intersection 39 does not show Wabash Ave and vehicles coming from that segment.

A2-9 2. The PHV for (Intersection 39) NB I-805 Off-Ramp and Intersection 40 SB I-805 Off-Ramp are low compared to Caltrans, please clarify.

A2-10 3. Traffic count sheets where not attached to TIS. Need to verify peak hours times.

Caltrans would also like to provide updates on the following projects and studies:

A2-11 • **SR-94 Express Lanes Project**:
Caltrans has been studying the environmental impacts of adding Express Lanes along SR 94 between I-805 and Downtown San Diego. The addition of these Express Lanes would support the planned South Bay Rapid service, as well as carpools and vanpools along the route.

Local and state representatives, as well as community stakeholders, along the project alignment have recently requested that Caltrans and SANDAG consider incorporating community-based alternatives into the SR 94 Express Lanes Draft Environmental Impact Report (EIR). Specifically, we have been asked to study buses on shoulders options, general purpose lane conversions and access to transit from local communities along 94.

The proposed Bus on Shoulder Project addresses the community's request to study buses on shoulders in the SR 94/I-805 corridor on an interim basis. Caltrans will also be analyzing a general lane conversion alternative and providing direct access to existing and future Rapid services from the communities along 94, which requires evaluation of the SR 15/SR 94 HOV direct connector.

The draft environmental document will be released for public review and comment once the additional analysis has been completed.

A2-12 • **I-8 Corridor Study:**
Please note that SANDAG, in coordination with Caltrans, recently completed the Interstate 8 (I-8) Corridor Study, which assessed a set of identified operational and multimodal improvements along I-8 between Sunset Cliffs Boulevard and College Avenue.

A2-13 • **Freeway Cap Best Practices Guide:**
Caltrans is currently developing a guide to discuss the possibilities and requirements of freeway caps. A cap is a structure—bridge, deck, tunnel, platform, or lid—located above a freeway that supports development in the freeway (R/W)-a cap that typically includes an active park or residential recreation—are the most common caps.

A2-8 Northbound volumes include ramp and Wabash Avenue volumes since they merge just south of the intersection. This modification does not identify an inadequacy in the analysis of the Draft PEIR and does not require a revision to the Final PEIR.

A2-9 Existing peak hour volumes were collected in May 2009 for the University Avenue Mobility Project (UAMP). Future Year peak hour volumes were developed using Series 12 regional model and methodologies from the National Cooperative Highway Research Program (NCHRP) 255. It is common that traffic counts taken at different times vary; however the counts included in the analysis are based on the best available data and future projections based on Series 12 regional model methodologies.

A2-10 The traffic count sheets have been added to the TIS that is available online and have been provided directly to Caltrans in response to this comment.

A2-11 The City appreciates the Caltrans project updates provided in this comment.

A2-12 The City appreciates being informed of the I-8 Corridor Study.

A2-13 The City appreciates being informed on Caltrans' efforts to develop a freeway cap best practices guide.

A2-14

Parks and Recreation
For any proposed parks/park equivalencies on State R/W, further coordination is needed between Caltrans and the City to determine if the R/W can be declared excess and sold to a third party, and if not, to pursue an airspace lease. Caltrans policy allows for transportation compatible uses within the airspace defined as "any property within R/W limits of an existing highway,.. that is capable of other development without undue interference with the operation and foreseeable future expansion of the transportation corridor" and includes "area in cut or fill slopes (Caltrans Right-of-Way Manual, Section 15.01.01.01). Furthermore, Marler-Johnson park Agreements (Section 15.04.01.05) allows a local agency to request use of Caltrans airspace for park or recreational purposes; Marler-Johnson agreements may be offered for a period of ten years with five-year extensions.

Caltrans appreciates the continued coordination with City staff on this Plan. If you have any questions, please contact Vanessa De La Rosa, Transportation Planner, at (619) 688-2510 or e-mail vanessa.delarosa@dot.ca.gov.

Sincerely,

JACOB ARMSTRONG, Branch Chief
Development Review Branch

A2-14 The City will coordinate with Caltrans on any proposed parks or park equivalencies on State right-of-way and will obtain the appropriate agreements as needed.

Letter A3

Metropolitan Transit System

1255 Imperial Avenue, Suite 1000
San Diego, CA 92101-7490
(619) 231-1466 • FAX (619) 234-3407

July 28, 2016

Mr. Kurtis Steinert
Senior Environmental Planner
City of San Diego
1010 Second Avenue, MS 413
San Diego, CA 92101

SUBJECT: NORTH PARK AND GOLDEN HILL COMMUNITY PLAN UPDATES - DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REVIEW COMMENTS

Dear Mr. Steinert:

A3-1 The San Diego Metropolitan Transit System (MTS) is in receipt of the Draft Programmatic Environmental Impact Review (PEIR) for the North Park and Golden Hill Community Plan Updates (CPUs). Thank you for providing us the opportunity to now review the Draft PEIR.

A3-2 MTS is appreciative of the community's commitment to provide safe and convenient routes to transit services, and to sustainable and transit-supportive land uses. Our specific comments are as follows:

- **North Park, Mobility Element ME-2.1**: Implement transit system priority for buses and queue jumps to improve the efficiency of travel by bus, where appropriate.
- **North Park, Mobility Element ME-2.2**: Consider the use of exclusive or restricted transit lanes where there is sufficient ridership.
- **North Park, Mobility Element ME-2.7**: Work with MTS and SANDAG to implement transit priority measures to improve transit travel times.
- **Golden Hill, Mobility Element ME-2.6**: Work with MTS and SANDAG to implement transit priority measures to improve transit travel times. Transit priority measures include, but are not limited to, transit signal priority for buses, queue jumpers, exclusive transit lanes, transit ways, use of freeway shoulders, and direct access ramps to freeway High Occupancy Vehicle (HOV) facilities.

MTS Comment: MTS encourages traffic signal improvements to enhance the quality of transit service, incentivizing area residents and visitors to use the bus and Trolley. Traffic volumes along major transit corridors, in particular El Cajon Boulevard and University

Metropolitan Transit System (MTS) is a California public agency and is comprised of San Diego Transit Corporation and San Diego Trolley, Inc. nonprofit public benefit corporations, in cooperation with Chula Vista Transit and National City Transit. MTS is the taxicab administrator for eight cities and the owner of the San Diego and Arizona Eastern Railway Company.
MTS member agencies include: City of Chula Vista, City of Coronado, City of El Cajon, City of Imperial Beach, City of La Mesa, City of Lemon Grove, City of National City, City of Poway, City of San Diego, City of Santee, and the County of San Diego.

A3-1 Comment noted. The City appreciates the Metropolitan Transit System's (MTS's) participation in the public review process.

A3-2 Comment noted. This comment does not suggest an inadequacy of the PEIR.

Avenue, are a notable current impediment to efficient transit service. High roadway traffic volumes penalize transit riders, whose journey also includes stopping to board and alight other riders. MTS requests the inclusion of bus-only lanes along these busiest corridors where traffic queues make Transit Signal Priority (TSP) and other priority measures less effective in isolation. In other areas, transit queue jumpers in addition to TSP should be implemented to offer further travel time savings to transit riders.

A3-3

- **North Park, Mobility Element ME-2.3**: Enhance the pedestrian and bicycle amenities around transit stops with curb extensions ("corner bulb-outs"), bicycle parking, shelters, additional seating, lighting, public art, shade trees, and landscaping to increase the comfort and convenience for transit riders.
- **North Park, Mobility Element ME-2.4**: Work with MTS to increase the transit rider experience by placing shade structures, benches and timetables at bus stops, where feasible.
- **Golden Hill, Mobility Element ME-2.2**: Coordinate with SANDAG to promote infrastructure that enhances accessibility and improves the transit user's experience at transit stops.
- **Golden Hill, Mobility Element ME-2.3**: Work with MTS to place benches, shade structures and timetables at bus stops, where sidewalk depth is sufficient.

MTS Comment: Entities apart from MTS can provide landscaping, seating, shelters, and other amenities at bus stop locations if they have an agreement with the City and coordinate location and other elements with MTS. That entity would be responsible for the cost, installation, maintenance, cleaning, liability, and removal of the amenities. Public and private developers should work with MTS to ensure that existing and potential future bus stop locations are built to meet the accessibility requirements of the Americans with Disabilities Act (ADA), and any improvements should be closely coordinated with MTS to ensure accessibility and compatibility with transit operations and future plans. MTS discourages the placement of curb extensions at intersections where in-service MTS buses turn due to the large turn radius required.

A3-4

- **North Park, Mobility Element ME-2.5**: Work with SANDAG to implement electronic arrival schedules where appropriate and implement real-time transit schedule updates to provide timely and efficient loading.
- **Golden Hill, Mobility Element ME-2.4**: Coordinate with MTS and SANDAG to install electronic arrival schedules where appropriate and implement real time transit schedule updates to provide timely and efficient loading.

MTS Comment: MTS has been developing updated specifications for real-time electronic signage, but does not have funding to support broader implementation outside of transit centers and select Rapid bus stations at this time. Real-time transit information signage is expensive to install and maintain, and identical real-time service information can now be accessed through mobile devices.

-2-

A3-3 Comment noted. This comment does not suggest an inadequacy of the PEIR.

A3-4 Comment noted. This comment does not suggest an inadequacy of the PEIR.

A3-5

- **North Park, Mobility Element ME-2.8**: Coordinate with MTS on bicycle and pedestrian infrastructure improvements to avoid adverse impacts to existing and planned bus services to the community.
- **Golden Hill, Mobility Element ME-2.8**: Coordinate with MTS on bicycle and pedestrian infrastructure improvements to avoid adverse impacts to existing and planned bus services to the area.

MTS Comment: MTS supports efforts to provide safe and convenient routes to transit services, especially improvement of pedestrian and bicycle access to major transit stops. These should be closely coordinated with MTS to ensure accessibility compliance and compatibility with transit operations and future plans. Any roadway motor vehicle capacity reductions and traffic calming measures should be made in consideration of transit vehicle routing so as to not adversely impact travel times for transit riders, or create a safety concern which restricts transit vehicle movements. Such measures include speed tables, traffic circles, bulb-outs, and chicanes. Limited space may create conflicts with parked cars and/or bicycles, and could reduce MTS' ability to effectively provide transit service in an area.

A3-6

- **North Park, Mobility Element ME-2.11**: Support the implementation of Streetcars along historic routes per SANDAG's Regional Transportation Plan in order to become a richly connected community. Support seeking historic designation for refurbished historic streetcars.

MTS Comment: Any proposed rail solution should only be considered in a completely separated guideway (versus operating in mixed-flow traffic lanes). Note that four years ago MTS conducted a study that estimated streetcar capital costs at up to $50 million/mile (excluding land acquisition costs). A cost/benefit analysis should be used to determine whether a more robust bus network, operating in separated lanes, could be as effective and with a potentially much lower cost.

A3-7

- **North Park, Mobility Element ME-2.12**: Create programs that incentivize the distribution of transit passes.

MTS Comment: MTS would be happy to work with the City and other outside groups to distribute transit passes, but is unable to contribute financial support toward this effort.

Sincerely,



Denis Desmond
Manager of Planning

Cc: Sharon Cooney, MTS Chief of Staff
Sara Osborn, Senior Planner/Community Planning, City of San Diego
Jeff Murphy, Director of Planning Department, City of San Diego

-3-

A3-5 Comment noted. This comment does not suggest an inadequacy of the PEIR.

A3-6 Comment noted. This comment does not suggest an inadequacy of the PEIR.

A3-7 Comment noted. This comment does not suggest an inadequacy of the PEIR.

Letter A4

From: Hudson Sarah [mailto:shudson@sandi.net]
Sent: Tuesday, July 12, 2016 11:56 AM
To: Turgeon, Bernard <BTurgeon@sandiego.gov>
Subject: Comments regarding North Park and Golden Hill Community Plan Updates PEIR

Mr. Turgeon,

A4-1 Please accept these comments and edits on behalf of San Diego Unified School District for the public review comment period ending July 28, 2016.

A4-2 1) Page 6.12-7, in Table 6.12-1. Under Joint Use Facilities at the bottom of the page. ALBA is **not** a charter school. It is a district-run school.

A4-3 2) Page 6.12-14, in Table 6.12-3. At the top of the page. The Student Generation Rate for K-12 has a typo. It shows 0.1.47 and it should be 0.147.

A4-4 3) Figure 6.12-2, map of Parks, Recreation Facilities, and Open Space. The name of ALBA is just ALBA School, not ALBA High School. Remove the word "High."

Thank you.

Sarah Hudson
Demographer, San Diego Unified School District
Instructional Facilities Planning Department
4100 Normal Street, Annex 2, Room 101
San Diego, CA 92103-2682
Telephone (619) 725-7369

1

Fax (619) 725-7382
shudson@sandi.net

A4-1 This is an introductory comment. The City appreciates and accepts submittal of the School Districts comments.

A4-2 The City appreciates this clarification. The Final PEIR, Table 6.12-1 has been revised to reflect that Alba School is not a charter school.

A4-3 The noted typographical error has been corrected in the Final PEIR, Table 6.12-3.

A4-4 Figure 6.12-2 of the Final PEIR has been updated to reflect the location of Parks, Recreational Facilities, and Open Space and as requested, the label for ALBA School was corrected.

Letter A5

SANDAG

401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

July 28, 2016

File Number 3300300

Mr. Kurtis Steinert
City of San Diego
Planning Department
1010 Second Avenue, Mail Station 413
San Diego, CA 92101

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 County Transit District
United States Department of Defense
San Diego Unified Port District
San Diego County Water Authority
Southern California Tribal Chairmen's Association
Mexico

Dear Mr. Steinert:

SUBJECT: North Park and Golden Hill Community Plan Updates Draft Programmatic Environmental Impact Report (Project No. 380611)

A5-1 Thank you for the opportunity to comment on the North Park and Golden Hill Community Plan Updates (Updates) Draft Program Environmental Impact Report (PEIR). The San Diego Association of Governments (SANDAG) supports the City of San Diego's efforts to promote the policies included in San Diego Forward: The Regional Plan (Regional Plan), which emphasize the need for land use and transportation coordination, as well as implementation of smart growth and sustainable development principles. The Regional Plan also sets forth a multimodal approach to meeting the region's transportation needs. Our comments are based on policies included in the Regional Plan and are submitted from a regional perspective.

Smart Growth

A5-2 SANDAG appreciates that the City of San Diego has prioritized transit-oriented development and land use changes in the project area that support both the goals of the Updates as well as the Smart Growth Concept Map and the Regional Plan. A key goal of the Regional Plan is to focus growth in smart growth opportunity areas. Three Smart Growth Opportunity Areas identified on the Smart Growth Concept Map are located in the two communities: two Existing/Planned Mixed-Use Transit Corridors (SD GH-1, SD NP-1), as well as a Town Center (SD NP-2). The proposed project is currently well-served by a number of high-frequency local bus routes (Routes 1, 2, 6, 7, 10, and 11), as well as a *Rapid* service (Route 215).

A5-1 Comment noted. The City appreciates SANDAG's participation in the environmental review process for this project.

A5-2 This comment is noted.

A5-3

Long-Range Transportation

The Regional Plan includes several planned high-performing transit routes that will provide access to and from the greater Golden Hill and/or North Park planning areas by 2040. Please consider including the following planned routes/services in the Golden Hill and/or North Park plan documents and noting the need to facilitate access to these public transit services:

- Regional *Rapid* transit station in the vicinity of 28th Street on the State Route 94 corridor, with access to regional destinations such as Downtown San Diego, Chula Vista, Otay Mesa, Kearny Mesa, Mira Mesa, and Escondido.
  - Routes 2, 10, and 11, currently high-frequency local bus services, will be transitioned to a *Rapid* service.
  - A new route (Route 637) also will be introduced.
- Streetcar Route 555: 30th Street to Downtown San Diego via North Park/Golden Hill.
  - Route 2, currently a high-frequency local bus service, will be transitioned to a Streetcar.
- *Rapid* 215 will be transitioned into the Mid-City Trolley (San Diego State University to Downtown)

A5-4

Transportation Demand Management

The SANDAG Transportation Demand Management (TDM) division supports the mobility and parking strategies included in the North Park and Golden Hill Plans. In order to further mitigate regional transportation impacts and increase mobility choices throughout both communities, please consider integrating the following strategies:

- Encourage the expansion and use of shared mobility services (such as bikeshare, carshare, on-demand rideshare, and shuttle services) to reduce reliance on private automobiles and reduce the demand for parking.
- Provide dedicated priority parking spaces for carpools, vanpools, and carshare vehicles.
- Consider partnering with the SANDAG TDM Program, iCommute, to promote regional services that encourage the use of transportation alternatives. These services include the SANDAG Vanpool Program, online ride-matching services, the Guaranteed Ride Home Program, and bike encouragement programs (including free bike education courses, the GO by BIKE Mini-Grant Program, and the Walk, Ride, and Roll to School Mini-Grant and Education Program).
- The iCommute Employer Outreach Program can work with businesses in the North Park and Golden Hill communities to promote transportation alternatives to employees.

More information on TDM programs can be found at www.iCommuteSD.com.

2

A5-3 These comments do not raise a specific issue with regard to the adequacy of the Draft PEIR. The comment discusses several planned transit routes in the Golden Hill and North Park area. These transit routes were considered in the analysis in the Draft PEIR as detailed in Sections 6.3 and 7.3 under Issue 2 for the North Park CPU and Golden Hill CPU, respectively. Both CPUs include policies regarding coordination with SANDAG to implement planned transit facilities as detailed in this comment.

A5-4 The comment provides recommendations for adding additional Transportation Demand Management (TDM) strategies to further mitigate regional transportation impacts and increase mobility choices throughout both communities, including:

- Encourage shared mobility services such as bikeshare, car share, on-demand ride share and shuttle services
- Dedicated priority parking for carpools, vanpools, and carshare vehicles.
- Partnering with SANDAG TDM Program, iCommute, to promote regional services that encourage transportation alternatives.

The Mobility Element goals for both CPUs align with the recommendations provided by SANDAG. Specifically, one of the key Mobility Element goals in both CPUs is for Inter-agency coordination to implement comprehensive mobility strategies and project opportunities and identification of funding sources. The proposed CPUs also incorporate specific policies consistent with SANDAG recommendations. For example, the North Park CPU parking policies address dedicated car-sharing parking spaces and providing electric vehicle charging stations. Proposed bicycling policies address installation of bike share stations. Similarly, proposed policies in the Golden Hill CPU are consistent with SANDAG recommendations. Transit policies support coordination and implementation of balanced multi-modal concepts and transportation and congestion relief programs such as the TDM Program, Street Smarts Traffic Safety Program, Residential Traffic Calming Program, Safe Routes to School Program, and TRAFFIX Program. Thus, as discussed in Section 6.3.3 and 7.3.3 of the Draft PEIR under Issue 2, the proposed CPUs and associated discretionary actions would be consistent with adopted policies, plans, or programs supporting alternative transportation.

A5-5

Regional Bike Infrastructure

The Draft PEIR contains language that appears to be inconsistent with the North Park Community Plan Update, the City of San Diego's Bicycle Master Plan, SANDAG's Regional Bike Plan, and the North Park/Mid-City Bikeways Project. The Draft PEIR proposes the following mitigation measures:

- TRANS 6.3-9 – Removal of traffic calming proposed at Meade Avenue and 30th Street, as well as at Howard Avenue and 30th Street
- TRANS 6.3-16 – Removal of Georgia – Meade Bikeway proposed on Florida Street between El Cajon Boulevard and Howard Avenue
- TRANS 6.3-17 – Removal of Howard – Orange Bikeway proposed on this roadway segment
- TRANS 6.3-19 – Removal of Georgia – Meade Bikeway proposed on this roadway segment
- TRANS 6.3-21 – Removal traffic calming proposed at Texas Street and Meade Avenue

Chapter 6 also includes a statement that "only measures TRANS 6.3-13 and TRANS 6.3-18 are proposed as part of the North Park Community Plan Update." This section should be revised to remove these references, especially since these proposed mitigation measures are not proposed to be included in the North Park Community Plan Update. SANDAG has prepared a draft mobility assessment for the North Park/Mid-City Bikeways Project and has determined that the bikeway improvements in the areas listed above have no significant traffic impacts.

If references to these mitigation measures are included in the final PEIR, there should be explicit language that these mitigation measures are not recommended and would conflict with the language in the North Park Community Plan Update.

Other Considerations

A5-6

A number of edits are proposed in the attachment to this letter to address minor errors (e.g., incorrect publication dates of planning documents) found in the Draft PEIR.

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

3

A5-5 This comment states mitigation measures proposed in the Draft PEIR; however, the stated measures are not as proposed or recommended in the PEIR and the comment indicates that the mitigation measures would be inconsistent with the North Park CPU, the City's Bicycle Master Plan, SANDAG's Regional Bike Plan, and the North Park/Mid-City Bikeways Project. The City agrees that the identified mitigation measures would be inconsistent with these referenced plans. The referenced measures are included within the Draft PEIR for purposes of identifying what measures *could* be implemented that would reduce the identified significant transportation impacts to a less than significant level. The introduction to Section 6.3.5 of the PEIR recognizes that none of the mitigation measures referenced in this comment are recommended for implementation due to their inconsistency with the mobility vision for the proposed North Park CPU and the City's General Plan. The analysis included within the Draft PEIR would not conflict with the mobility assessment for the North Park/Mid-City Bikeways Project.

Regarding the second part of this comment, the introductory language in Section 6.3.5.2 of the Final PEIR has been revised to clarify the referenced statement. The revision now states, "While the following roadway segment mitigation measures would reduce potentially significant impacts, only measures TRANS 6.3-13 and TRANS 6.3-18 would be consistent with the North Park CPU and associated discretionary actions and are included within the proposed IFS. The remaining measures would be inconsistent with the proposed North Park CPU."

A5-6 This comment is noted and specific responses regarding the attachment are provided in the responses below. Any future environmental notices and documentation will be provided as requested in the comment.

A5-7 We appreciate the opportunity to comment on the Updates Draft PEIR. If you have any questions, please contact Susan Baldwin at (619) 699-1943 or via e-mail at susan.baldwin@sandag.org.

Sincerely,

Katie Hentrich

KATIE HENTRICH
Regional Energy/Climate Planner

KHE/kcu

Attachment: 1. Minor Edits, North Park and Golden Hill Community Plan Updates Draft PEIR

4

A5-7 Comment noted.

Attachment 1
Minor Edits, North Park and Golden Hill Community Plan Updates Draft PEIR

***Rapid* Transit**

A5-8 When discussing Bus *Rapid* Transit throughout the document, please replace the existing term with "*Rapid.*" Similarly, please remove any references to "Arterial Rapid Transit" and replace with "*Rapid.*" On page 2-10, please combine sections a. and c. under one section, titled "*Rapid,*" and use the following description:

> "*Rapid* transit is corridor-level service providing fast and frequent transit services that are designed to take advantage of both freeway improvements, such as High Occupancy Vehicle and managed lanes, and arterial improvements, in order to serve longer-distance regional trips. The *Rapid* service on arterials will operate on arterial roadways and provide limited-stop, high-speed service along several key corridors throughout the region, supplementing existing local bus services."

A5-8 The requested revisions are reflected in the Final PEIR.

A5-9 **San Diego Forward: The Regional Plan**

Throughout the document, when appropriate, please replace any reference to the 2050 Regional Transportation Plan with "San Diego Forward: The Regional Plan," as this was the most recently adopted Regional Plan (October 9, 2015).

On page 5-10, Section 5.3.3.1, please edit the section to read as follows:

> "San Diego Forward: The Regional Plan (RP) combines two of the region's existing planning documents: The Regional Comprehensive Plan (RCP) and the Regional Transportation Plan and its Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The RCP covered eight policy areas, including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the RP.
>
> On April 24, 2015, SANDAG released the draft RP for public comment, with a closing date of July 15, 2015. The final RP was adopted by the SANDAG Board of Directors on October 9, 2015."

A5-9 The requested revisions are reflected in the Final PEIR.

A5-10 **Greenhouse Gas Reductions**

The information in Section 5.5.2.6 (pages 5-23 and 5-24) is outdated. Please update this section and consider using the following language, adapted from the Regional Plan:

> "A Climate Change Scoping Plan (Scoping Plan) was prepared pursuant to AB 32 (the Global Warming Solutions Act of 2006) by ARB in 2008 and updated in 2014. The Scoping Plan identifies reduction targets for all sources of greenhouse gas (GHG) emissions in the state. While the transportation sector is responsible for the greatest GHG reductions (nearly 30 percent of the total reductions), most of these reductions

5

A5-10 The requested revisions are reflected in the Final PEIR.

will come from higher fuel efficiency vehicles per the Pavley standards (18 percent) and a more diverse fuel mix per the low carbon fuel standards (9 percent). Statewide, Regional Transportation Plans prepared by metropolitan planning organizations, such as SANDAG, are responsible for less than 3 percent of the GHG reductions. SB 375 is the mechanism that establishes GHG emission reduction targets for each regional agency.

SANDAG's SB 375 target is to reduce GHG emissions from cars and light trucks by 7 percent, per capita, by 2020, and by 13 percent by 2035, using a 2005 baseline.

The Regional Plan, encompassing both the RTP and SCS, shows that the region will exceed these targets by pursuing the following strategies: using land in ways to make developments more compact, conserving open space, and investing in a transportation system that provides people with alternatives to driving alone."

Pershing Drive Cycle Track

A5-11 Figure 6.3-4 should be altered to show the proposed cycle track along the length of Pershing Drive through Balboa Park, as well as on Upas Street from Pershing Drive to Utah Street. Although the portion of the cycle track through Balboa Park is out of the planning areas in question, other facilities are called out in Balboa Park and this should be included, as well.

Freeway Segment Improvements

A5-12 Please update Sections 6.3.5.3 and 13.2.1.3 to reflect improvements identified in the Regional Plan, as many of the freeway segment improvements listed are out of date. The changes include:

- TRANS 6.3.27 – This project is not in the Regional Plan. Please remove from the document.
- TRANS 6.3.28 – The Regional Plan shows operational improvements on I-8 from I-5 to SR 125
- TRANS 6.3.30 – The Regional Plan shows Managed Lane improvements on I-805 from SR 15 to SR 163
- TRANS 6.3.31 – The Regional Plan shows Managed Lane Improvements on SR 94 from I-5 to I-805. However, based on input from the community, Caltrans will evaluate additional alternatives as part of the environmental analysis for the SR 94 Express Lanes Project.

6

A5-11 Figure 6.3-4 was not revised since it is a figure taken from the SANDAG Regional Bicycle Plan. However, Figure 6.3-5 was revised to show the segment of Upas Street between Utah and 28th as a proposed cycle track. Since the remainder of the proposed cycle track is outside of the CPU area, this is not shown on the figure.

A5-12 These revisions have been updated in Section 6.3.5.3 (and in the Executive Summary) as requested.

Letter A6

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

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 15, 2016

Kurtis Steinert
City of San Diego
1010 Second Ave, MS 413
San Diego, CA 92101

Subject: North Park and Golden Hill Community Plan Update
SCH#: 2013121076

Dear Kurtis Steinert:

A6-1 The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 14, 2016, 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.

A6-2 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,

Scott Morgan
Director, State Clearinghouse

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

A6-1 This is an introductory comment acknowledging the City's compliance with the State Clearinghouse review requirements.

A6-2 This is an introductory comment that provides contact information for questions regarding the environmental review process.

Document Details Report
State Clearinghouse Data Base

SCH#	2013121076
Project Title	North Park and Golden Hill Community Plan Update
Lead Agency	San Diego, City of
Type	**EIR** Draft EIR
Description	The proposed North Park and Golden Hill Community Plans Update are consistent with and incorporate relevant policies from the 2008 City of San Diego General Plan, as well as provide a long-range, comprehensive policy framework for growth and development in the North Park and Golden Hill communities. The North Park and Golden Hill Community Plans were originally adopted in 1986 and 1988, respectively. North Park was last amended in 2003 and the Golden Hill has not been amended since adoption. Separate community plans have been prepared for the North Park and Golden Hill communities, and are evaluated in a single PEIR.

Lead Agency Contact

Name	Kurtis Steinert		
Agency	City of San Diego		
Phone	619-235-5206	*Fax*	
email			
Address	1010 Second Ave, MS 413		
City	San Diego	*State* CA	*Zip* 92101

Project Location

County	San Diego			
City	San Diego			
Region				
Lat / Long				
Cross Streets				
Parcel No.				
Township		*Range*	*Section*	*Base*

Proximity to:

Highways	163,94,15
Airports	San Diego Int'l
Railways	BNSF; MTS
Waterways	SD River; Pacific Ocean
Schools	San Diego Unified Schools
Land Use	Various

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects; Aesthetic/Visual; Drainage/Absorption; Soil Erosion/Compaction/Grading; Vegetation

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Water Resources; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received 05/31/2016 *Start of Review* 05/31/2016 *End of Review* 07/14/2016

Edmund G. Brown Jr.
Governor

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

Ken Alex
Director

Memorandum

Date: July 25, 2016
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2013121076
North Park and Golden Hill Community Plan Update

A6-3

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **July 28, 2016** to accommodate the review process. All other project information remains the same.

Please contact the Lead Agency for further information if you no longer have the project.

cc: Kurtis Steinert
City of San Diego
1010 Second Ave, MS 413
San Diego, CA 92101

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

A6-3 This statement acknowledges the public review period extension to July 28, 2016.

EXTENSION OF PUBLIC REVIEW

PLANNING DEPARTMENT
Date of Notice: **June 2, 2016**
PUBLIC NOTICE OF A
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)
Internal Order No. 11001370

The City of San Diego Planning Department has prepared a draft Program Environmental Impact Report for the following project and is inviting your comments regarding the adequacy of the document. On **May 26, 2016**, the North Park Community Planning Committee requested a 14-calendar day extension of the public review period for this DEIR which would end on July 14, 2016. Pursuant to the City's Municipal Code requirements, the Environment and Policy Analysis Division has granted the request, and extended the review period to **July 28, 2016.** In accordance with CEQA Section 15105, this 14-day extension will not affect the City's statutory requirements under CEQA for public review of a draft PEIR. Send your written comments to the following address: **Kurtis Steinert, Environmental Planner, City of San Diego Planning Department, 1010 Second Avenue, Suite 1200, MS 413, San Diego, CA 92101 or e-mail your comments to PlanningCEQA@sandiego.gov with the Project Name in the subject line.**

PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT No. 380611 / SCH No. 2013121076
COMMUNITY AREA: North Park and Golden Hill
COUNCIL DISTRICT: 3

PROJECT DESCRIPTION: The proposed North Park and Gold Hill Community Plans Updates (CPUs) are consistent with and incorporate relevant policies from the 2008 City of San Diego General Plan, as well as provide a long-range, comprehensive policy framework for growth and development in the North Park and Golden Hill communities. The North Park and Golden Hill Community Plans were originally adopted in in 1986 and 1988, respectively. North Park was last amended in 2003 and the Golden Hill has not been amended since adoption. Separate community plans have been prepared for the North Park and Golden Hill communities, and are evaluated in a single PEIR.

The North Park Community Plan Update can be found on the Planning Department's website at:

https://www.sandiego.gov/planning/community/profiles/greaternorthpark

The Golden Hill Community Plan Update can be found on the Planning Department's website at:

https://www.sandiego.gov/planning/community/profiles/greatergoldenhill

The proposed North Park and Golden Hill CPUs provide detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, the prioritization and provision of public facilities, community and site specific urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the North Park and the Golden Hill communities.

CPU implementation requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; adoption of a Land Development Code (LDC) ordinance that would repeal the Golden Hill Planned District Ordinance (GHPDO) zoning; amendments to the LDC to remove North Park from the Mid-City Communities Planned District Ordinance (MCPDO); amendments to the LDC to rezone the area located in the Golden Hill and North Park Community Planning Areas from the Golden Hill Planned District and Mid-City Communities Planned District to Citywide zoning; adoption of LDC amendments to allow for implementation of the community plan policies; amendments to the Neighborhood Development Permit regulations to include Supplemental Design Regulations for Potential Historic Districts; and a comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new impact fee for each community.

North Park Community Plan Update

The North Park Community Plan area is an urbanized community consisting of approximately 2,300 acres. It is located in the central portion of the City of San Diego and is in close proximity to Downtown San Diego. North Park abuts the community planning areas of Uptown on the west, Mission Valley on the north, City Heights and Normal Heights on the east, and Golden Hill and Balboa Park on the south. North Park is defined by its mesa tops with canyon and hillside areas. The majority of North Park is relatively flat or gently sloping with pronounced hillside areas located in the northern boundary of the community adjacent to Mission Valley and the southeastern portion of the community adjacent to Golden Hill.

Golden Hill Community Plan Update

The Golden Hill Community Plan area is an urbanized community consisting of approximately 750 acres. It is located in the central portion of the City of San Diego. Golden Hill abuts the community planning areas of Downtown San Diego on the west, City Heights on the east, North Park on the north, Southeastern San Diego on the south, and Balboa Park on the west and north. The majority of Golden Hill is gently sloping with pronounced hillside areas located in the eastern boundary of the community adjacent to City Heights and North Park.

Applicant: City of San Diego, Planning Department

Alyssa Muto
Deputy Director
Planning Department

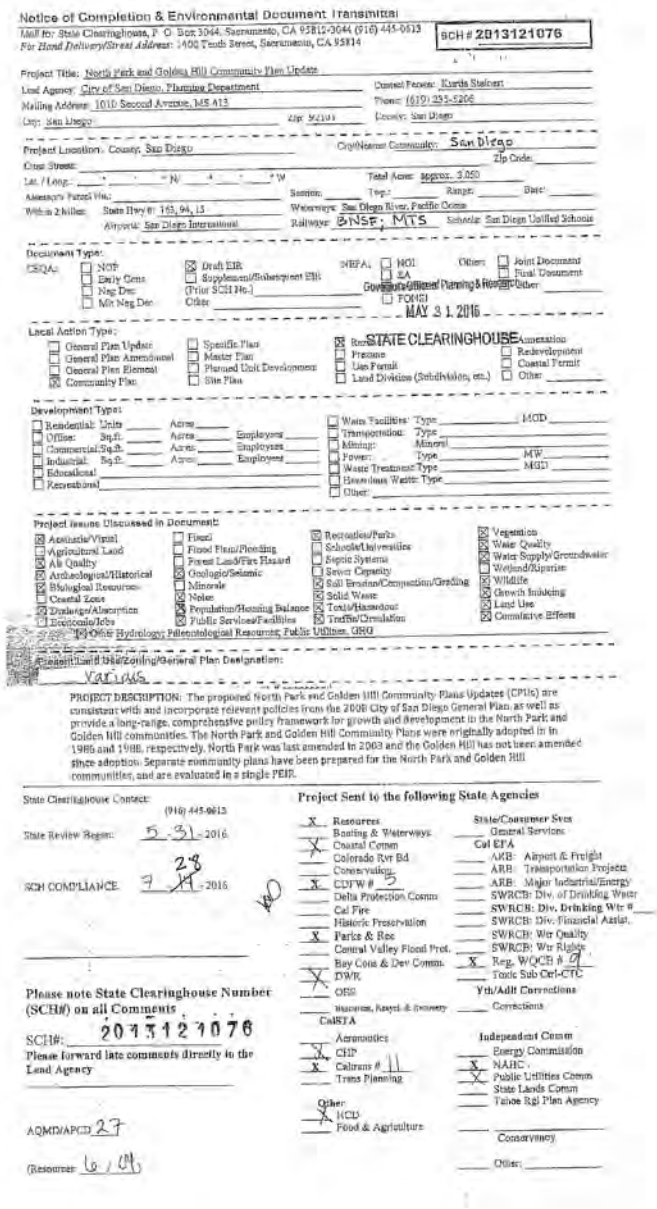
Governor's Office of Planning & Research

JUL 25 2016

STATE CLEARINGHOUSE

LETTER

RESPONSE



Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613 SCH # 2013121076

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: North Park and Golden Hill Community Plan Update

Lead Agency: City of San Diego, Planning Department — Contact Person: Kurtis Steiert

Mailing Address: 1010 Second Avenue, MS 413 — Phone: (619) 235-5206

City: San Diego — Zip: 92101 — County: San Diego

Project Location: County: San Diego — City/Nearest Community: San Diego

Cross Streets: — Zip Code:

Lat. / Long.: ° ' " N / ° ' " W — Total Acres: approx. 3,000

Assessor's Parcel No.: — Section: — Twp.: — Range: — Base:

Within 2 Miles: State Hwy #: 163, 94, 15 — Waterways: San Diego River, Pacific Ocean

Airports: San Diego International — Railways: BNSF, MTS — Schools: San Diego Unified Schools

Document Type:

CEQA: ☐ NOP ☐ Early Cons ☐ Neg Dec ☐ Mit Neg Dec ☒ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.) ☐ Other

NEPA: ☐ NOI ☐ EA ☐ FONSI ☐ Other: ☐ Joint Document ☐ Final Document ☐ Other:

Governor's Office of Planning & Research

MAY 31 2016

STATE CLEARINGHOUSE

Local Action Type:

☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☒ Community Plan ☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan ☒ Rezone ☐ Prezone ☐ Use Permit ☐ Land Division (Subdivision, etc.) ☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☐ Other

Development Type:

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☐ Commercial: Sq.ft. ____ Acres ____ Employees ____
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☐ Educational: ____
☐ Recreational: ____
☐ Water Facilities: Type ____ MGD ____
☐ Transportation: Type ____
☐ Mining: Mineral ____
☐ Power: Type ____ MW ____
☐ Waste Treatment: Type ____ MGD ____
☐ Hazardous Waste: Type ____
☐ Other: ____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Agricultural Land ☒ Air Quality ☒ Archeological/Historical ☒ Biological Resources ☐ Coastal Zone ☒ Drainage/Absorption ☐ Economic/Jobs ☐ Fiscal ☐ Flood Plain/Flooding ☐ Forest Land/Fire Hazard ☒ Geologic/Seismic ☐ Minerals ☐ Noise ☒ Population/Housing Balance ☒ Public Services/Facilities ☒ Recreation/Parks ☐ Schools/Universities ☐ Septic Systems ☐ Sewer Capacity ☒ Soil Erosion/Compaction/Grading ☒ Solid Waste ☒ Toxic/Hazardous ☒ Traffic/Circulation ☒ Vegetation ☒ Water Quality ☒ Water Supply/Groundwater ☐ Wetland/Riparian ☒ Wildlife ☒ Growth Inducing ☒ Land Use ☒ Cumulative Effects

☒ Other: Hydrology; Paleontological Resources; Public Utilities, GHG

Present Land Use/Zoning/General Plan Designation:

VARIES

PROJECT DESCRIPTION: The proposed North Park and Golden Hill Community Plans Updates (CPUs) are consistent with and incorporate relevant policies from the 2008 City of San Diego General Plan, as well as provide a long-range, comprehensive policy framework for growth and development in the North Park and Golden Hill communities. The North Park and Golden Hill Community Plans were originally adopted in in 1986 and 1988, respectively. North Park was last amended in 2003 and the Golden Hill has not been amended since adoption. Separate community plans have been prepared for the North Park and Golden Hill communities, and are evaluated in a single PEIR.

State Clearinghouse Contact: (916) 445-0613

State Review Begins: 5-31-2016

SCH COMPLIANCE: 7-28-2016

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2013121076

Please forward late comments directly to the Lead Agency

AQMD/APCD 27

(Resources: 6/09)

Project Sent to the following State Agencies

X Resources
X Boating & Waterways
Coastal Comm
Colorado Rvr Bd
Conservation
X CDFW # 5
Delta Protection Comm
Cal Fire
Historic Preservation
X Parks & Rec
Central Valley Flood Prot.
Bay Cons & Dev Comm.
X DWR
OSP
Reclamation, Kasyd & Recovery

CalSTA
Aeronautics
X CHP
X Caltrans # 11
Trans Planning

Other:
X HCD
Food & Agriculture

State/Consumer Svcs
General Services

Cal EPA
AKB: Airport & Freight
ARB: Transportation Projects
ARB: Major Industrial/Energy
SWRCB: Div. of Drinking Water
SWRCB: Div. Drinking Wtr #
SWRCB: Div. Financial Assist.
SWRCB: Wtr Quality
SWRCB: Wtr Rights
X Reg. WQCB # 9
Toxic Sub Ctrl-CTC

Yth/Adlt Corrections
Corrections

Independent Comm
Energy Commission
X NAHC
X Public Utilities Comm
State Lands Comm
Tahoe Rgl Plan Agency

Conservancy

Other:

Letter B1

CLG
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July 8, 2016

Via Email
RMalone@sandiego.gov
PlanningCEQA@sandiego.gov

Rebecca Malone
Associate Planner
City of San Diego Planning Department
1010 Second Avenue MS 413
San Diego CA 92101

Re: **San Ysidro, North Park, Uptown, and Golden Hill Community Plan Updates**
Climate Action Campaign CEQA Comments
Project Nos. 21002568, 380611, and 310690

Dear Ms. Malone:

Please accept the following comments on behalf of our client Climate Action Campaign regarding the Environmental Impact Reports (EIRs) for the San Ysidro, North Park and Golden Hill, and Uptown Community Plan Updates. Climate Action Campaign's mission is to stop climate change. To achieve this goal, Climate Action Campaign has been actively engaged in the development and passage of the City's Climate Action Plan. Now, Climate Action Campaign's focus is to ensure the Climate Action Plan is implemented, and its goals are achieved.

B1-1

The City has an opportunity to make great strides in implementing Climate Action Plan goals with the adopted of Community Plan Updates. As noted below, however, each of the Community Plan Update EIRs fails to comply with the California Environmental Quality Act (CEQA) with respect to greenhouse gas (GHG) emissions. Until and unless these deficiencies are addressed, the EIRs will not withstand judicial scrutiny.

B1-2

I. The Climate Action Plan Is the City's Central Climate Plan

The City's Climate Action Plan plays a pivotal and important role in not only reducing GHG emissions Citywide, but also mitigating the impacts of the City's General Plan. (CAP, p. 5). Eventually, this document will serve as a CEQA Qualified GHG Reduction Plan. In the interim, however, a project-level CAP consistency determination is an essential component of CEQA GHG impacts assessment. Inconsistency with a land use plan or policy intended to mitigate environmental impacts is likely to result in a finding of significant environmental impact. (See *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 934 ["Because the land use policies at issue were adopted at least in part to avoid or mitigate environmental effects, we consider their applicability under the fair argument test with no presumption in favor of the City."]).

B1-1 Please see responses to comments B1-2 through B1-9.

B1-2 The comment states that the Climate Action Plan (CAP) does not currently serve as a CEQA Qualified GHG Reduction Plan, and that a project-level consistency determination is an essential component of CEQA GHG impacts assessment. The comment also states that inconsistency with a land use plan or policy is likely to result in a finding of significant environmental impact. The comment states that land use plans are an important part of achieving the GHG reductions identified in the CAP, and that the SYCPU fails to "ensure CAP consistency in 2020 and beyond."

The CAP was originally adopted in December 2015, and while it was anticipated that it would serve as a qualified GHG reduction plan for purposes of tiering under CEQA pursuant to CEQA Guidelines Section 15183.5, it provided that future implementing actions were necessary in order to serve as such a plan. However, on July 12, 2016, the City Council adopted an amendment to the CAP, which included a CAP Consistency Checklist, and other amendments to the text of the CAP, which resulted in the CAP serving as a qualified GHG reduction plan. At that same time, the City Council also adopted a GHG Significance Determination Threshold (GHG Threshold). Following signature by the Mayor on July 19, 2016, the checklist and thresholds are being implemented immediately. The North Park and Golden Hill Community Plan Updates (CPUs) PEIR tiers off the GHG analysis set forth in the CAP Final EIR, which was certified on December 15, 2015, with an addendum certified on July 12, 2016, that specifically addressed the adoption of the GHG Threshold.

As discussed in the Draft PEIR Sections 6.5 and 7.5, the proposed CPUs and associated discretionary actions are consistent with the adopted CAP, and contain goals and objectives that implement all of the five primary CAP strategies. Please see Draft PEIR pages 6.5-10 through 6.5-12 and 7.5-9 through 7.5-10 for a discussion of consistency with the CAP strategies. It is concluded that the proposed North Park and Golden Hill CPUs and associated discretionary actions would be consistent with each of the CAP strategies by:

- Increasing the number of residential units and commercial development within the Transit Priority Areas (TPAs) within the community to support transit;
- Implementing transit-oriented development;
- Promoting pedestrian improvements;
- Encouraging the use of passive or zero net energy strategies;
- Supporting waste reduction, recovery, and recycling;
- Encouraging the planting of native and drought-tolerant landscaping; and
- Increasing the tree canopy.

Regarding the need to achieve overall compliance with the Citywide targets identified in the CAP, please also refer to CAP Chapter 3 which provides for annual monitoring and reporting to ensure CAP reduction targets are met. Please also see response to comment B1-3.

B1-3

As the mechanism to achieve compliance with State reduction goals, the CAP requires vigilance and, in light of the looming 2020 reduction target, immediate implementation. Such implementation is especially important in the context of long-term land use plans such as Community Plan Updates (CPU). Unfortunately, the CPU EIRs fail to ensure the necessary CAP consistency in 2020 and beyond. As detailed below, the EIRs therefore reveal a significant environmental impact with respect to GHGs.

II. The EIRs Fail to Demonstrate Compliance with the Climate Action Plan

To determine whether impacts are significant under CEQA, all of the CPUs rely on a quantitative comparison of future buildout of current Community Plans with future buildout of the proposed CPUs. (See San Ysidro EIR, p. 5.4-16; North Park EIR, pp. 6.5-8-9; Golden Hill EIR, p. 7.5-8; Uptown EIR, pp. 6.5-7-8). Fundamentally, this analysis is improper.

First, the EIRs fail to address, much less analyze, environmental impacts pursuant to CEQA Guideline Section 15064.4(b). A lead agency should assess the significance of GHG emissions by considering the extent to which a project increases emissions compared to the *existing environmental setting*. (CEQA Guidelines §15064.4(b)(1)). All three Community Plan Update EIRs quantify existing emissions, as well as anticipated emissions for existing Community Plans at buildout, and emissions expected at buildout under the proposed CPUs.[1] (See Helix GHG Technical Report for San Ysidro CPU March 2016, pp. 15 and 27; RECON Supplemental Analysis to GHG Analysis for Uptown, North Park, and Golden Hill CPUs, May 16, 2016, pp. 6-8). Nonetheless, the EIRs fail to address the increase in emissions associated with the CPUs – especially in 2020 and 2035 when compared with the existing emissions – or explain why such increases are not significant.

Perhaps more importantly, the CPU EIRs and appendices do not put such increased emissions in context considering the Climate Action Plan reduction goals. The Climate Action Plan requires a **15 percent** reduction from 2010 baseline emissions by 2020, a **40 percent** reduction by 2030, and a **50 percent** reduction by 2035. (CAP, p. 21). Notwithstanding these ambitious CAP GHG reduction goals, and the CPUs' *quantitative* inconsistency with the CAP, the EIRs simply presume CAP consistency based on a *qualitative* analysis. The CPUs make this determination, in part, by claiming the CAP assumes growth based on the Community Plans in effect at the time the CAP was being developed. (See San Ysidro EIR, p. 5.4-8; Uptown EIR, p. 6.5-6; North Park EIR, p. 6.5-5; Golden Hill EIR, p. 7.5-5 ["The CAP assumes future population and economic growth based on the community plans that were in effect at the time the CAP was being developed. Therefore, community plan updates that would result in a

[1] The Helix GHG Technical Report for the San Ysidro CPU does not indicate in which year buildout occurs. Because construction emissions are annualized for thirty years, presumably buildout occurs in the next 30 years. (See Helix GHG Technical Report for San Ysidro CPU March 2016, p. 24).

CLG

B1-3 The commenter states that the Draft PEIR fails to assess the significance of GHG emissions by considering the extent to which a project increases emissions compared to the existing environmental setting. The existing GHG emissions are set forth in Draft PEIR Sections 6.5.3.1 and 7.5.3.1, and specifically in Table 6.5-3 and 7.5-3 for North Park and Golden Hill, respectively. This information is also provided in Table 3 of the GHG Supplemental Report, which is included as Appendix E-2. To analyze the significance of GHG emissions, the PEIR then estimates projected GHG emissions under the CPUs as set forth in PEIR Table 6.5-3 and 7.5-3 (this information is also provided in Tables 8 and 9 of the GHG Supplemental Report, included as Appendix E-2). For the Golden Hill CPU, Table 7.5-3 explicitly shows the decrease from the existing conditions and the proposed CPU (a total decrease of 9,423 MT CO2E decrease from existing conditions, which is specifically identified on PEIR page 7.5-7). Table 7.5-3 also shows the decrease from the adopted Golden Hill Community Plan and the proposed CPU (a total decrease of 408 MT CO2E decrease from the Adopted Community Plan, which is specifically identified on PEIR page 7.5-7). As concluded in the PEIR, since the Golden Hill CPU would result in a reduction of GHG emissions when compared with land uses currently approved and would be consistent with the CAP, GHG emission impacts would be less than significant.

For the North Park CPU, Table 6.5-3 explicitly shows the increase from the existing conditions and the proposed CPU (a total increase of 4,065 MT CO_2E increase over existing conditions). A two-step process was then used to determine whether the increase of 4,065 MT CO_2E in GHG emissions over existing conditions is significant. Whether that increase is significant was determined by (1) whether the North Park CPU emissions would exceed the emissions in the Adopted Community Plan, and if so, whether the increase in GHG emissions is a direct result of implementing CAP strategies and the General Plan's City of Villages Strategy by focusing new density in TPAs, and (2) whether the North Park CPU is consistent with applicable policies and plans, including the CAP. Please see Draft PEIR Section 6.5.3for additional discussion.

As shown in the PEIR, GHG emissions would increase over existing levels with buildout under the proposed North Park CPU due to the increase in higher density and intensity development within TPAs that would take place under the plan. GHG emissions would also increase over GHG emissions associated with buildout of the Adopted Community Plan. However, as

B1-3 (cont.)

discussed in the PEIR, the majority of the new multi-family dwelling units are planned either within, or within a 0.5-mile radius of, a Community Village Center or TPA. By targeting new growth along transit corridors, within, or within a 0.5-mile radius of, a Community Village, the proposed North Park CPU would be consistent with the General Plan's City of Villages Strategy, and thus, with Action 3.1 of the CAP, which calls for implementation of the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas (TPAs) to increase use of transit. The increase in GHG is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the Citywide GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be less than significant. Thus, the proposed change in land uses would not significantly alter the assumptions in the CAP.

Additionally, with respect to Step 2 of the analysis, the Draft EIR looked to see whether the proposed North Park CPU would be consistent with the CAP and its strategies. Please see Draft EIR Section 6.5.3 for additional discussion. Consistent with CAP Strategy 3, the North Park CPU proposes increased density within TPAs in order to plan for reduced GHG emissions Citywide. When compared to the existing condition, this necessary increase results in an increase in GHG emission levels in area, energy, waste, water, and construction emission sources (due to the increased density and new development); however, it results in a *decrease* in mobile emission sources. This decrease in mobile emissions is due to the continuing increase in federal and state regulations that improve vehicle efficiency.

Additional decreases in mobile GHG emissions that are not reflected in the emission calculations would occur because density would increase in the TPAs, and trips would decrease due to increased use of alternative transportation modes. The document prepared by the California Air Pollution Control Officers Association (CAPCOA) entitled *Quantifying Greenhouse Gas Mitigation Measures* demonstrates that, by increasing transit accessibility, a shift in travel mode is facilitated along with reduced vehicle miles traveled (VMT). The effectiveness of these land use strategies ranges from less than 1 percent up to a maximum 30 percent reduction in communitywide VMT and are not additive. For example, where high-density

B1-3 (cont.)

mixed-use development is located within a 5- to 10-minute walk from a transit station with high-frequency transit or bus service, and is combined with walkable neighborhood design, a total VMT reduction up to 24 percent can be achieved. This is consistent with the CAP's GHG emissions reductions targets which are based on reductions in VMT from increasing the bicycling, walking, and transit mode shares within TPAs, and from decreasing commuter miles traveled, which results in a reduction in mobile emissions compared to the business as usual scenario. The North Park CPU is consistent with the reductions estimates in the CAP because it promotes effective land use and implements the City of Villages strategy.

It is important to note that when modeling GHG emissions, the default CalEEMod trip generation rates and trip lengths were modeled for the existing conditions, buildout of the adopted community plans, and buildout of the proposed CPUs. Actual trip lengths in San Diego County are shorter than these model default trip lengths. Additionally, as discussed, the CPUs would reduce VMT due to the increased density in TPAs. These reductions are not reflected in the emission calculations presented in the PEIR. Thus, the GHG emission calculations included in the PEIR are conservative.

As shown in CAP Appendix A, the CAP VMT reductions in 2035 are Citywide reductions for labor force commuter trips. Some communities may have higher reductions, while some may have less due to a variety of factors, such as average commuter distance for a particular community. The CAP reductions are Citywide reductions, and due to the nature of community planning, are not always appropriate to be distributed equally amongst each community. For example, an increase in GHG emissions in one community may actually be necessary to alter the overall land use pattern in the City to achieve the reductions assumed for more effective land use Citywide.

From a GHG perspective, increased density in a TPA correlates with lower overall citywide GHG emissions. For example, CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* demonstrates that transit ridership increases with density, which justifies enhanced transit service. Higher density also allows City residents to take advantage of non-auto modes of transportation as such facilities become available. Therefore, focusing development inside TPAs rather than outside TPAs is consistent with CAP

B1-3 (cont.)

Strategy 3. This can be found on page 6 of the City of San Diego Climate Action Plan Consistency Checklist Technical Support Documentation. On the other hand, focusing development outside of a TPA would tend to be inconsistent with the CAP even though GHG emissions may not increase (because no new development would occur). Therefore, while looking at the increases or decreases in GHG emissions on a particular community plan update is instructive, it is not determinative as to overall Citywide consistency with the CAP.

In addition, the CAP recognizes that reductions can be achieved in multiple ways and that flexibility in implementation is necessary. As shown on pages 42 and 43 of the CAP, the annual monitoring and reporting would identify any potential deficiencies in citywide reductions and the CAP could be amended to address those deficiencies. The annual monitoring and reporting program is the appropriate place to monitor Citywide GHG emissions reductions, not an individual community CPU EIR. Furthermore, new development within the North Park and Golden Hill CPU areas that is subject to CEQA review would be required to complete the CAP Consistency Checklist to ensure project consistency with the CAP. As stated above, the City is implementing this requirement immediately for development projects.

Therefore, implementation of the North Park CPU, as well as the Golden Hill CPU and associated discretionary actions, in combination with implementation of the CAP overall, along with the CAP's annual monitoring and reporting, ensures achievement of the CAP's overall *Citywide* emissions reductions, and nothing in the land uses proposed in the CPUs would be inconsistent with the promotion of effective land use to reduce VMT, or the ability to achieve the alternative mode shares assumed in the CAP.

Please also see response to comments B1-4 and B1-5.

reduction in GHG at build-out compared to GHG emissions at build-out under the adopted Community Plan would result in further GHG reductions."]). However, the phrase "2010 baseline emissions" cannot be read to mean a baseline defined by "emissions at buildout of Community Plans as they existed in 2010." This approach fails under the CAP and under CEQA.

Though the CAP assumed population growth in calculating *business-as-usual* emissions, nothing in the CAP or CAP appendices indicates GHG reduction modelling relied on existing Community Plans ever actually achieving this buildout. As such, the CPUs' reliance on full buildout at plan levels as a baseline is speculation and does not amount to substantial evidence. (Pub. Res. Code § 21082.2(c); CEQA Guidelines, § 15384(a) ["Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."]).

B1-4

Rather, the CAP's narrative goals and modelling appendices indicate the exact opposite is true: the CAP expects, and indeed relies on, Community Plan updates that will alter land-use patterns and shift density to Transit Priority Areas. The CAP includes goals to implement the City of Villages Strategy in Transit Priority Areas and promote effective land use to reduce vehicle miles traveled. (CAP, pp. 37-39). Specifically, a CAP supporting measure requires achievement of better walkability and transit-supportive densities "by locating a majority of all new residential development within Transit Priority Areas." (CAP, p. 39).

B1-5

Parts of San Ysidro and the majority of Uptown, North Park, and Golden Hill are within Transit Priority Areas, but the EIRs and associated GHG analysis appendices fail to quantify: (i) how the CPUs implement the GHG emission reductions associated with CAP strategies, particularly increased density in TPAs; and, (ii) if such reductions meet the CAP 2020, 2030 and 2035 goals. Such quantitative consistency is particularly important here because to achieve the requisite reductions, the CAP relies heavily on Strategy 3, Bicycling, Walking, Transit and Land Use. Strategy 3 comprises one of the largest shares of local reduction actions. (CAP, p. 30). In the earlier years of the CAP, Strategy 3 is responsible for 36 percent of GHG emission reductions Citywide. Within Strategy 3, "Mass Transit" and "Promote Effective Land Use to Reduce Vehicle Miles Traveled" are two of the largest reduction sub-strategies. (*Id.*).

Such modeling is achievable. The CAP models VMT (and associated GHG) reductions associated with each CAP strategy. (See CAP Appendix A, pp. A-31-A-38). Further, VMT reduction modeling was conducted as part of the CPU EIRs. Nonetheless, the EIRs fail to quantitatively bridge the analytical gap between: (i) the CPU VMT and associated GHG

CLG

B1-4 The commenter states that the CAP relies on community plan updates to alter land use patterns and shift density to TPAs. The North Park and Golden Hill CPUs are consistent with these CAP goals. Specifically, the commenter cites to CAP Strategy 3, which includes a supporting measure to locate a majority of all new residential development within TPAs. The North Park CPU is consistent with this supporting measure in that it focuses new development and increased densities in the 30th Street and University Avenue Village and the 30th Street and El Cajon Boulevard Village, which are located within Key Corridors consisting of El Cajon Boulevard, University Avenue, 30th Street, Adams Avenue, and Park Boulevard. Additionally, San Diego Association of Governments' (SANDAG's) 2050 Regional Transportation Plan includes a planned trolley line for El Cajon Boulevard with a planned stop at its intersection with 30th Street. The Mobility Element of the General Plan states that the City of Villages Strategy would support expansion of the transit system by calling for villages to be located in areas that can be served by high-quality transit. The Golden Hill CPU is consistent with this supporting measure in that it focuses new development and increased densities in the 25th Street Neighborhood Village and the 30th Street Transit Corridor. Please also see response to comment B1-3.

B1-5 Please see responses to comments B1-3 and B1-4. Regarding modeling VMT reductions, please see Draft PEIR Sections 6.5.1.1b and 7.5.1.1b, which discuss reductions in VMT. The proposed North Park and Golden Hill CPUs and associated discretionary actions propose an increase in multi-family residences. The VMT from residents of these new developments would be less due to the reduced trip lengths. Although this reduction was only counted for new development proposed under the proposed CPUs and associated discretionary actions, this would reduce overall mobile emissions by 4.4 percent in the North Park CPU area and 3.1 percent in the Golden Hill CPU area. This is supported both quantitatively and qualitatively by CAPCOA's Quantifying Greenhouse Gas Mitigation Measures measure LUT-4, Increase Destination Accessibility, which is documented to reduce VMT by up to 20 percent, and, therefore, reduce GHG emissions up to 20 percent. Additionally, it is important to note that the GHG emission calculations did not take into account any reductions in VMT that result from either existing or proposed transit-oriented land use pattern. For example, CAPCOA's Quantifying Greenhouse Gas Mitigation Measures identifies several features included in the proposed CPUs that would

B1-5 (cont.)

reduce VMT. CAPCOA measure LUT-1, Increase Density, is identified as means to reduce VMT and the corresponding GHG emission by up to 30 percent. By including a wide variety of land uses in the 30th Street and University Avenue Village, the 30th Street and El Cajon Boulevard Village, and the 25th Street Neighborhood Village, the CPUs would achieve CAPCOA measure LUT-3, Increase Diversity of Urban and Suburban Developments (Mixed Use), which is considered capable of reducing VMT and the corresponding GHG emission between 9 to 30 percent because residents would be in the same area as retail and office buildings. The concentration of development around the 30th Street Transit Corridor would achieve CAPCOA measure LUT-5, Increase Transit Accessibility, which may result in up to a 24.6 percent reduction in VMT and corresponding GHG emissions. If the VMT reductions resulting from the inclusion of these factors into the proposed CPUs were taken into account in the impact analysis, the reduction in GHG emissions will be even greater, therefore, the analysis is a conservative presentation of GHG emissions reductions.

The commenter also notes that modeling for specific CAP goals is achievable. The City is continuing to explore a variety of ways to inform our data gathering and monitoring efforts for CAP implementation and GHG reductions.

reductions; and, (ii) the correlating CAP GHG reductions. (See, for example, Uptown, North Park and Golden Hill CPU Appendix E.2, Attachment 1).[2]

B1-6 This data is also a critical component of demonstrating CAP compliance. Without such data and analysis, numerous questions remain regarding CAP reduction measures. For example, if these four CPUs result in a net increase in emissions in both 2020 and 2035 compared to the 2010 baseline, and all other CPUs are similarly evaluated based only on an expected reduction in emissions compared to full buildout of adopted Community Plans – *despite an increase from existing emissions* – where will the reductions come from? If these four CPUs result in an increase in GHG emissions in 2020 and 2035, reductions from other future land use decisions will have to be even greater to make up for such increases, and it is unclear where such opportunities exist.

B1-7 As the California Supreme Court recently found in *Center for Biological Diversity v. Department of Fish & Wildlife* ("*Newhall Ranch*") (2015) 62 Cal.4th 204, the EIRs here fail to bridge the analytical gap between the increase in CPU emissions and consistency with the CAP:

> The analytical gap left by the EIR's failure to establish, through substantial evidence and reasoned explanation, a quantitative equivalence between the Scoping Plan's statewide comparison and the EIR's own project-level comparison deprived the EIR of its "'sufficiency as an informative document.'" (*Newhall Ranch*, *supra*, 62 Cal.4th at 227, citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392).

B1-8 As the planning mechanism to shape future development in these planning areas, the CPUs must result in CAP-mandated reductions *now*.[3] Nevertheless, the EIRs contain no mention of the appropriate allocation of reduction measures attributable to CPU implementation. The CPUs' increase in GHG emissions is counterfactual to a CAP consistency determination. Because the EIRs fail to adequately address the "quantitative equivalence" between the City's CAP and the CPUs, the EIRs are insufficient and the CPUs will result in significant GHG impacts.

[2] See also, Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan, SCH #2014121002, April 26, 2016, p.E-8,9 (reflecting achievement of active transportation mode share increases based on quantitative modeling).
[3] The Supreme Court also posited that "a greater degree of reduction may be needed from new land use projects than from the economy as a whole" in light of the fact that new development is more easily designed to reduce GHG emissions. (*Newhall Ranch*, *supra*, 62 Cal.4th at 226).

CLG

B1-6 The commenter asks how a community plan that increases GHG emissions over existing conditions can result in GHG reductions. Please see response to comment B1-3. As discussed in response to comment B1-3, the reductions assumed from implementation of Strategy 3 come from a decrease in mobile source emissions tied directly to labor force commute trip length (see page A-31 through A-38 of Appendix A to the CAP). This increase in the density in the community is anticipated to bring the labor force already commuting through and into the City and that is forecast to increase through 2035 to TPAs connected to employment centers in nearby communities. Implementation of the rest of the other CAP strategies would address the increase in other source emissions (e.g., energy, water, etc.) due to implementation of the CAP Strategy 3 for location of increased density and the majority of new residential development in TPAs. In other words, any increases that result from the CPUs also result in decreases in mobile source emissions. Therefore, even if a community plan increases overall GHG emissions within a particular community, if the community plan achieves mobile source reductions, that part of the assumed reductions in the CAP has been realized; implementation of the CAP overall is what would ensure that the City meets its citywide targets identified in the CAP.

It is also important to note that in the GHG emissions modeling done for the Adopted Community Plans and the CPUs, the CalEEMod assumptions utilized to forecast GHG emissions were conservative and reflected the default from CalEEMod Version 2013.2.2. This approach to modeling does not take into account the emissions reductions of the Citywide ordinances and programs in the CAP to be implemented by the City, and which are not specifically relevant to the proposed CPUs (i.e., Citywide energy, water or waste policies). For example, the first Goal under Strategy 2 of the CAP is to achieve 100 percent renewable energy Citywide by 2035. The CalEEMod energy default values are based on studies from the California Energy Commission, and not on achieving 100 percent renewable energy. Likewise, the Citywide efforts in CAP Strategy 1: Energy and Water Efficient Buildings would result in fewer emissions from sources associated with the provision of water, and CAP Strategy 4: Zero Waste would decrease the expected emissions from waste sources over what was accounted for in the CalEEMod modeling. In this manner, emissions projections for the CPUs do not account for the GHG emissions reductions of the CAP. The emissions

B1-9

III. Conclusion

The current CPU EIRs fail to meet applicable CEQA mandates. The CPU EIRs must assess quantitative compliance with the Climate Action Plan, its reduction targets and goals. As drafted, the EIRs demonstrate a lack of compliance with Climate Action Plan goals because all four CPUs result in an increase in GHG emissions compared to baseline rather than a decrease of 15 percent by 2020, 40 percent by 2030, and 50 percent by 2035. Climate Action Campaign urges the City to conduct the requisite analysis and recirculate the EIRs for further public comment.

Thank you in advance for your consideration of our comments.

Sincerely,

COAST LAW GROUP, LLP

Marco Gonzalez
Livia Borak
Attorneys for Climate Action Campaign

cc: Client

B1-6 (cont.)

projections were produced to give a means of comparing the difference in land use emissions, i.e., the effect that changing the adopted land uses would have on the production of GHG emissions.

B1-7 Please see response to comment B1-3.

B1-8 Regarding the comment's footnote which suggests that greater GHG reductions may be needed for new development, please see the City's CAP Consistency Checklist, which is included as a CAP Appendix. The CAP Consistency Checklist provides for greater reductions from new development that is subject to CEQA. Regarding the North Park and Golden Hill CPU's overall consistency with the CAP, please see response to comment B1-3.

B1-9 Please see response to comments B1-1 through B1-8.

LETTER

Letter B2

DELANO & DELANO

July 28, 2016

VIA E-MAIL & U.S. MAIL

Kurtis Steinert
Senior Environmental Planner
City of San Diego
1010 Second Ave., MS 413
San Diego, CA 92101

Re: North Park Community Plan and Draft EIR

Dear City of San Diego:

B2-1 This letter is submitted on behalf of the Environmental Justice League in connection with the proposed North Park Community Plan ("Project") and related Draft Environmental Impact Report ("EIR").

B2-2 The California Environmental Quality Act ("CEQA"), Pub. Res. Code §§ 21000 – 21177, must be interpreted "so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency's decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. An EIR is "aptly described as the 'heart of CEQA'"; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

B2-3 The Project would result in an increase of over 11,500 residential units and a population increase of almost 40 percent. Community Plan at 14. Additionally, the Community Plan Enhancement Program would allow substantial increases in density beyond the maximum allowed density in certain areas. *Id.* at 30. These represent substantial changes to the North Park community; unfortunately, the EIR fails to adequately analyze the impacts associated with these substantial changes.

B2-4 The EIR fails to adequately analyze land use impacts. Indeed, a goal of the City's Climate Action Plan ("CAP") – "Promote effective land use to reduce vehicle miles traveled" – is implemented by Action 3.6: "Implement transit-oriented development within Transit Priority Areas." CAP at 39. Furthermore, the General Plan's Strategic

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RESPONSE

B2-1 Comment noted.

B2-2 Comment noted.

B2-3 This comment makes general statements that the Draft PEIR fails to analyze the impacts with the proposed North Park CPU but does not cite any specific inadequacies; thus, a specific response cannot be provided. The City does not agree that the EIR fails to analyze the impacts of the proposed North Park CPU. The more detailed comments that follow are addressed in the following responses.

B2-4 The City does not agree that the Draft PEIR fails to analyze land use impacts. The Draft PEIR includes an evaluation of consistency with the General Plan and the Climate Action Plan (CAP) and finds the North Park CPU would be consistent with both plans. Consistency of the North Park CPU with applicable policies of the General Plan is analyzed in Section 6.1, Table 6.6-1. Consistency with CAP policies are analyzed in Section 6.5.3.2 of the Draft PEIR. The City agrees that the CAP and General Plan acknowledge the appropriateness of encouraging development in areas of employment and transit. The proposed North Park CPU aligns with the policies of the General Plan and the CAP by assigning the highest density within commercial corridors with access to transit. The commenter is correct that the proposed CPU cannot guarantee growth and development within these areas; however, the proposed North Park CPU and associated discretionary actions provide for growth and development within these areas. The North Park CPU and associated discretionary actions propose changes to allowed land uses and development regulations to facilitate development in proximity to transit; however, future development would need to be initiated by private landowners. As discussed in the Draft PEIR, Section 3.4.1.1, Land Use Element, the land use plans locate the highest intensity land uses within each community along transit corridors where existing and future commercial, residential and mixed-use development can support existing and planned transit investments. In North Park, growth is focused into the 30th Street and University Avenue Community Village and the 30th Street and El Cajon Boulevard Community Village corridor areas to provide mixed-use activity centers that are pedestrian friendly and linked to an improved regional transportation system. Regarding the comment about Transit Priority Areas (TPA), the corridor areas do meeting the definition of a TPA. Refer to response to comment B-23 which addresses the referenced comment from Dave Potter.

Framework Element provides: "By directing growth primarily toward village centers, the strategy works to preserve established residential neighborhoods and open space, and to manage the City's continued growth over the long term." General Plan at SF-6. In other words, both the CAP and General Plan acknowledge the appropriateness of encouraging development in areas of employment and transit simultaneously preserves existing neighborhoods and open space while reducing greenhouse gas emissions. Yet the Community Plan does not guarantee such growth and development. Section 2.3 of the Community Plan does reference "key corridors," but there is no reference to Transit Priority Areas. *Id.* at LU-38 – 39. Nor is any consideration given to the fact that several areas currently do not have transit meeting the definition of a Transit Priority Area (a copy of an April 11, 2016 letter from Dave Potter on this issue is attached and hereby incorporated by reference). The EIR fails to acknowledge the impacts associated with development that is inconsistent with the CAP and General Plan requirements.

B2-5 Also, the EIR fails to consider shade and shadow impacts, despite the fact that it would result in an increase in multi-family residential units of over 12,000 units. Community Plan at 14.

B2-6 The EIR fails to adequately analyze Environmental Justice impacts. The Project would lead to the displacement of substantial numbers of low-income populations and communities of color. The increases in residential units and the Community Plan Enhancement Program would eliminate existing affordable housing.

B2-7 The EIR fails to adequately analyze historic resources impacts. The increases in residential units and the Community Plan Enhancement Program would eliminate existing historic housing.

B2-8 The EIR fails to adequately analyze traffic impacts. The EIR acknowledges that the Project would result in significant impacts. EIR at 6.3-48. Indeed, many intersections, roadway segments and ramps are operating at LOS E or worse. SB743 will soon be a requirement for California. The study does not provide for a Vehicle Miles Traveled ("VMT") analysis. A project of this size should include a VMT calculation at a minimum.

B2-9 The EIR notes that the traffic study recommended 33 "improvements that would mitigate or reduce roadway segment and intersection impacts." EIR at 6.3-44. And the traffic study notes (p. 6-1) that the recommended mitigation "would restore operations to LOS D or better at all locations." However, the EIR notes that only <u>three</u> mitigation measures were adopted, but there is no showing that such mitigation is infeasible. And it further notes that "the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring." EIR at 6.3-48. CEQA's "substantive mandate" requires agencies to refrain from approving projects with significant effects where there are feasible mitigation measures or alternatives that can lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4th 105, 134. "[T]he Legislature has

B2-5 At a program level of analysis, it is not possible to evaluate site-specific shade and shadow impacts of future development and the height, design, and specifications of future development is not known. However, the proposed PEIR does address compatibility between mixed-use development and single-family land uses. Specifically, Section 6.2 of the PEIR, under Issue 2 addresses neighborhood character and discusses that the proposed Urban Design Element identifies Development Transition Areas where policies would be applied to ensure compatible transitions between higher density areas and lower density areas. These policies would address a number of issues to include potential shade and shadow impacts by requiring a compatible height transition that is detailed on Figure 6.2-4 of the Draft PEIR. Implementation of Development Transition Area policies would ensure significant shade and shadow impacts would not result from build-out of the CPU.

B2-6 As stated in the proposed North Park CPU, "The land use vision for North Park is to encourage mixed-use development along its major commercial corridors with higher residential densities where commercial goods and services and public transit would be directly accessible. As part of this vision, the traditional single-family residential neighborhoods will be maintained at low densities, and the older higher multi-family residential areas that are in close proximity to the major commercial corridors will be redeveloped with an emphasis on pedestrian connectivity and compatibility with the community's traditional and high quality progressive character" (North Park CPU, page 12). The North Park CPU encourages the redevelopment of multi-family units built from the 1960s through the 1980s (Residential Infill Policy LU-4.20). The proposed North Park CPU is a land use plan that is intended to accommodate growth and implement the City General Plan City of Villages Strategy and the strategies of the CAP over the next 20 years. Providing opportunities and incentives for higher density development within proximity to transit is a central component of these plans. While redevelopment of existing residential land uses, by its nature, causes a temporary displacement of residents, redevelopment with higher density housing increases the housing stock available to residences and helps the City meet its housing goals. While housing and residents would be temporarily displaced when redevelopment of older housing stock occurs, the net result is additional housing and a diversity of housing types to serve the housing needs of the City within an urbanized area suitable for increased densities based on policies contained in the North Park CPU.

B2-6 (cont.)

Allowing higher density ranges creates opportunities for additional residential development that may include a range of income levels. The proposed North Park CPU supports the development of affordable housing (see policies LU-4.6 through LU-4.11).

Thus, the redevelopment of older auto-centric properties that are six units or more and that may not comply with current ADA and Title 24 standards would implement environmental justice goals and objectives to provide additional accessible housing opportunities that meet current health and safety and energy standards. Specifically, Executive Order 12898 on Environmental Justice directs each federal agency to develop a strategy to address environmental justice concerns in its programs, policies, and regulations. The intent of the order is to avoid disproportionately high and adverse impacts on minority and low-income populations with respect to human health and the environment. This order is not applicable to the proposed North Park CPU because it is not being undertaken by a federal agency nor is it funded by a federal agency.

Additionally, the proposed North Park CPU and associated discretionary actions are not subject to Government Code Section 11135, subdivision (a) because it is not an activity undertaken by the state or a state agency. Government Code Section 11135 provides that, "No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state."

B2-7 The City disagrees that the Draft PEIR failed to adequately analyze impacts to historical resources. Section 6.7 of the Draft PEIR evaluates impacts to historical resources. As discussed in this section, significant impacts to historical resources were identified that would be mitigated by implementation of mitigation measure HIST 6.7-1. However, since the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis, the PEIR finds impacts to historical resources would be significant and unavoidable.

B2-8 The City disagrees that the Draft PEIR failed to adequately analyze traffic impacts and Appendices B-1 and B-2 provide the technical analysis to support the conclusions of the Draft PEIR. As discussed in Section 6.3 of the PEIR, a number of significant transportation and circulation impacts were identified to street segments, intersections, and freeway facilities (segments and ramps). For each identified impact, a mitigation measure was identified that could minimize impacts; most of the identified measures would not align with the goals of the proposed North Park CPU and, therefore, were not recommended. For example, in some cases, a lower level of service (LOS) for traffic was determined preferable to widening a street segment and eliminating pedestrian or bicycle facilities. The City acknowledges the implications of SB 743. The City is in the process of identifying an appropriate local approach to address SB 743 and is tracking the Office of Planning and Research's Draft CEQA Guidelines and Technical Advisory regarding SB 743 implementation. At this time, a vehicle miles traveled (VMT) calculation is not a requirement of the City or the CEQA Guidelines. Please refer to response to comment B1-3 for discussion of increased density in the TPAs resulting in decreased trips due to increased use of alternative transportation modes.

B2-9 The Draft PEIR identifies 33 mitigation measures that would reduce significant impacts, but only three of those measures are included within the proposed Infrastructure Fee Study and recommended for implementation. The commenter states there is no discussion that the other mitigation measures are infeasible. The discussion of infeasibility was not included as part of the Draft PEIR because findings of infeasibility need to be adopted by the decision maker and have been prepared as part of the final hearing documents. Please refer to the attachments to the staff report for applicable CEQA findings and the justification and reasoning for why the measures and alternatives are not feasible.

LETTER

[] declared it to be the policy of the state 'that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects ….'" *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 597 – 98 (citations omitted).

B2-10 The EIR and traffic study fail to analyze impacts after mitigation for freeway segments and ramp meters. However, the traffic study (p. 6-1) acknowledges that "none of the freeway impacts would be fully mitigated by the" Project. Again, there is no analysis of feasible mitigation to address these impacts.

B2-11 The EIR acknowledges significant air quality impacts. EIR at 6.4-4. But it fails to consider mitigation that would reduce these impacts below significance, such as consideration of alternative strategies to reduce air pollution. EIR at 6.4-16.

B2-12 Additionally, the EIR acknowledges "an adverse impact because of the population-base park land deficit," but claims "impacts to land use would be less than significant." EIR at 6.12-12. However, the Community Plan acknowledges the "General Plan standard is to provide a minimum of 2.8 usable acres of public park land per 1,000 residents." Community Plan at 119. It states that existing parks and "park equivalencies" constitute 16.37 acres. *Id.* The Community Plan projects additional park land and "park equivalencies" of 104.82 acres, but the Project still results in a shortage of over 100 acres. *Id.* In other words, at build-out, the Project would result in slightly less than one-half of the General Plan minimum standard for park land. There is no legitimate way to characterize this as anything other than a significant impact. Indeed, where on-the-ground conditions are severe, the "relevant question" is whether the project's additional impacts will be significant "in light of the serious nature" of the existing problems. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.

B2-13 And the EIR fails to consider adequate and feasible mitigation for such impacts. In fact, it specifically acknowledges that "proposed fees are not designed to fully fund and address the parkland deficit." EIR at 6.12-12.

B2-14 The EIR's discussion of impacts to public services and facilities is likewise flawed, as it fails to acknowledge the significant impacts associated with failing to meet the minimum park land standard.

B2-15 The EIR fails to adequately analyze greenhouse gas emission impacts. On April 29, 2015, Governor Brown issued Executive Order B-30-15, which establishes a "new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 …." The EIR does not address compliance with Executive Order B-30-15. *See also Center for Biological Diversity v. Dept. of Fish and Wildlife* (2015) 62 Cal.4th 204, 229.

RESPONSE

B2-10 The PEIR identifies the improvements from SANDAG's RTP as potential mitigation for impacts to freeway segments. However, the PEIR explains that implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. Similarly, ramp metering is under the control of Caltrans and thus the City cannot feasibly implement any actions that would address ramp capacity. Please refer to the attachments to the staff report for applicable CEQA findings and the justification and reasoning for why the measures and alternatives are not feasible.

B2-11 The City disagrees that the PEIR failed to consider mitigation to reduce impacts to air quality. The PEIR identified two mitigation measures to reduce significant impact to air quality (AQ 6.4-1 and AQ 6.4-2). Mitigation measure AQ 6.4-2 is anticipated to reduce emissions from development projects consistent with the proposed North Park CPU. However, because project-level information is not available, it cannot be guaranteed that operational air emissions would be fully mitigated to below a level of significance.

B2-12 The Draft PEIR describes the significance thresholds for public services and facilities, including parks and recreation facilities, in Section 6.12.2. Based on the City's Significance Determination Thresholds, a significant public services and facilities impact would occur if implementation of the proposed North Park CPU and associated discretionary actions would promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities, *the construction of which could cause significant environmental impacts*. While the proposed North Park CPU includes policies and associated discretionary actions that support increasing the acreage of population-based park in the CPU area, it does not propose construction of new facilities at the project level. As discussed in Section 6.12.3, Impact Analysis, for Issue 1b Public Facilities, Parks and Recreation, although there is an existing and projected deficit in population-based parks, impacts associated with the construction of park facilities would be less than significant at the program level.

B2-13 Comment noted. This comment makes reference to the North Park community's population-based park deficit. See response to comment B2-12.

B2-14 The City disagrees that the PEIR failed to adequately analyze impacts to public services and facilities. This comment makes reference to the North Park community's population-based park deficit. See response to comment B2-12.

B2-15 This comment makes reference to Executive Order (EO) B-30-15 (2030 Statewide GHG Emissions Goal). Section 5.5.2.2 of the PEIR provides the regulatory background for EO B-30-15. Significance thresholds used in the evaluation of greenhouse gas (GHG) impacts are discussed in Section 6.5.2, Significance Determination Thresholds. As discussed in the Draft PEIR, implementation of the City's CAP would result in Citywide GHG reductions consistent with its proportionate share of statewide GHG emissions targets. Because the proposed North Park CPU is consistent with the City's CAP, it is consistent with EO B-30-15. As such, the City disagrees that the Draft PEIR failed to adequately analyze GHG emission impacts. In addition, refer to response to comments B1-2 through B1-8.

B2-16

The EIR fails to adequately analyze water supply impacts. There is an inadequate showing of water supply for the Project. The California Supreme Court recently identified three "principles for analytical adequacy under CEQA": (1) "CEQA's informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to a problem of supplying water to a proposed land use project"; (2) "an adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years"; and (3) "the future water supplies identified and analyzed must bear a likelihood of actually proving available …. An EIR for a land use project must address the impacts of likely future water sources, and the EIR's discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability." *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 430 – 32 (emphasis in original) (citations omitted). The EIR fails to comply with these mandates.

B2-17

The EIR fails to adequately analyze growth inducement impacts. The EIR claims the Project would not result in growth inducement because "the proposed CPU areas will grow whether or not the proposed" Project is adopted. EIR at 9-3. But this statement conflicts with the analysis of alternatives, which specifically acknowledges that the Lower-Density Alternative would "result in approximately 1,700 fewer units and a population decrease of approximately 3,150 compared to the proposed" Project. *Id.* at 11-18.

B2-18

CEQA requires that an EIR "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750 – 51. "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." CEQA Guidelines § 15126.6(b). "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 404. The EIR fails to comply.

B2-19

CEQA contains a "substantive mandate" that agencies refrain from approving a project with significant environmental effects if "there are feasible alternatives or mitigation measures" that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4th 105, 134; Pub. Res. Code § 21002. It "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects." *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. Here, the EIR claims the Lower-Density Alternative meets most of the Project objectives while being the environmentally superior alternative. EIR at 11-25.

B2-16 The City disagrees that the Draft PEIR fails to adequately analyze water supply impacts. Potential impacts to water supply resulting from the proposed North Park CPU are analyzed in Section 6.13.3, Impacts Analysis. Buildout projections for the proposed North Park CPU are consistent with the growth projections used for the City's 2015 Urban Water Management Plan, and once adopted, the proposed North Park CPU would be considered in the next cycle of the City's water supply planning. In addition, Appendix K-1 of the PEIR includes the Water Supply Assessment (WSA), which concluded sufficient water supply is available to serve the projected demands of the proposed North Park CPU.

B2-17 The City disagrees that the PEIR fails to adequately analyze growth inducement impacts. Chapter 9, Growth Inducement, of the PEIR provides a discussion of this analysis. Community plans serve as a comprehensive, long-term plan for the physical development of the community and are intended to manage and address future growth. While buildout of the Lower-Density Alternative would result in fewer units and a population decrease from buildout of the proposed North Park CPU, population would still grow compared to existing conditions. Population growth would also still occur under build-out of the adopted North Park CPU.

B2-18 The City does not agree that the Draft PEIR fails to comply with the requirements of an alternatives analysis pursuant to CEQA. The CEQA Guidelines Section 15126.6 requires that an EIR compare the effects of a "reasonable range of alternatives" to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should attain most of the basic project objectives, and avoid or substantially lessen one or more significant effects of the project. The Lower-Density Alternative evaluated in Chapter 11, Alternatives – North Park, would slightly reduce impacts to transportation and circulation, reduce significant impacts to air quality, and slightly reduce impacts to public services and facilities compared to the proposed North Park CPU. The No Project Alternative evaluated in Chapter 11 would slightly reduce impacts to visual character and neighborhood character and reduce significant impacts to air quality compared to the proposed North Park CPU, and slightly reduce impacts to health and safety. A Higher Density Alternative was also included that would result in slightly greater impacts related to traffic and transportation, air quality, and public facilities and services. Additional alternatives specific to the Golden Hill CPU were also provided in Chapter 12 of the PEIR.

	B2-19 There is no need to add a new "Environmental Justice Alternative" because as discussed in response to comments B2-6 there would be no impacts related to environmental justice.

However, the Environmental Justice Alternative would accomplish far more and create even less negative environmental impacts.

B2-20 The EIR fails to propose feasible mitigation and alternatives that can lessen or avoid the significant Project impacts. *City of Marina v. Board of Trustees of the California State Univ.* (2006) 2006 39 Cal.4th 341, 360; *see also* CEQA Guidelines § 15126.6(b). For example, the EIR acknowledges significant traffic impacts because the timing of traffic improvements is unknown. EIR at 6.3-48. But the EIR fails to consider requiring the timing of aspects of Project development to await the construction of necessary traffic improvements.

B2-21 Furthermore, the Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Project. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455.

B2-22 The EIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

For the foregoing reasons, the Environmental Justice League urges you to reject the Project and EIR as drafted. Thank you for your consideration of these concerns.

Sincerely,

Everett DeLano

Enc.

B2-20 The City does not agree that the Draft PEIR fails to propose feasible mitigation and alternatives that can lessen or avoid significant impacts at the program level. Policies included in the Mobility Element of the proposed North Park CPU would guide future development and traffic improvements to continue to reduce traffic congestion.

B2-21 A Community Plan, by its nature, is a site-specific and detailed policy document tailored to its community's specific characteristics and needs. As such, the City believes that the proposed project objectives were appropriately defined.

B2-22 This comment asserts that the Draft PEIR must be revised and recirculated, and provides a closing statement. As detailed in the responses to this comment letter, the City finds the Draft PEIR is adequate and compliant with CEQA, substantial revision of the PEIR is not required, and recirculation is not warranted.

Attachment to Letter B2

B2-23

Everett DeLano

From: NOTICE <davidapott@aol.com>
Sent: Monday, April 11, 2016 11:59 AM
To: kevinfaulconer@sandiego.gov; davidalvarez@sandiego.gov
Cc: sherrilightner@sandiego.gov; ToddGloria@sandiego.gov.; loriezapf@sandiego.gov; myrtlecole@sandiego.gov.; MarkKersey@sandiego.gov; ChrisCate@sandiego.gov; scottsherman@sandiego.gov; martiemerald@sandiego.gov; joe.lacava@gmail.com; murphyj@sandiego.gov; nsbragado@sandiego.gov
Subject: Climate Action Plan Transit Priority Area Map
Attachments: LTR TPA.pdf; _Certification_.htm

Dear Mayor Faulconer and Councilmember Alvarez:

As a planning consultant (and former Deputy Planning Director) in San Diego since 1968 and as a resident, I strongly support the strategies to achieve attainable greenhouse gas reduction targets established by the adopted Climate Action Plan (CAP) and the creation of the CAP implementation Working Group. I also support the adopted Strategic Framework Element of the General Plan. These two documents together will guide San Diego's growth in the future.

Of prime interest was the Transit Priority Area (TPA) Map included as Attachment B in the CAP. This map, along with the Strategic Framework Element, will serve during the initial phase of locating villages with high-density housing and mixed use.

A cursory review of the TPA Map, however, identified areas that do not comply with Section 21099 and 21064.3 of the California Public Resources Code; these sections were established as the basis for the Transit Priority Area Map.

Based on my finding during the cursory review, I undertook a more detailed evaluation of a number of other Transit Priority Areas.

The results of that evaluation are included in the attached letter. Please review and contact me if you have any questions.

Thank you for your courteous attention.

Sincerely,

David A. Potter
4975 Milton Street
San Diego, CA 92110
(619) 275-5120

1

B2-23 The letter includes an attachment which is a letter from David Potter regarding the Climate Action Plan Transit Priority Area Map. The following e-mail response from Nancy Bragado was provided in response to this letter. Although the letter was not written regarding the adequacy of the Draft PEIR, the response that was provided to Mr. Potter by the City on May 2, 2016 and is included here for informational purposes only:

From: Bragado, Nancy
Sent: Monday, May 02, 2016 3:02 PM
To: 'NOTICE' <davidapott@aol.com>
Cc: Murphy, Jeff <MurphyJ@sandiego.gov>; Hansen, Mike <MHansen@sandiego.gov>; Graham, David <GrahamD@sandiego.gov>
Subject: RE: Climate Action Plan Transit Priority Area Map

Dear Dave,
This is in response to your letter to Mayor Faulconer and Councilmember Alvarez dated April 11, 2016. In your letter you questioned the accuracy of the Transit Priority Area (TPA) map included as Appendix B of the City's Climate Action Plan (CAP).

We reviewed your analysis and the resources you consulted, and found that you based your conclusions on a SANDAG map showing transit lines with ten minute or better all-day service (see attached). In contrast, to prepare the TPA map, staff consulted SANDAG data identifying transit lines with minimum 15 minute frequency during morning and afternoon peak commute periods. The 15 minute standard is what is included in the SB 743 (California Public Resources Code Sections 21099 and 21064.3) definition incorporated into the CAP.

In addition, you questioned whether TPAs that span park areas, and other locations without proposed or permitted housing, should be included on the TPA map. The City is not proposing residential development in parks. It is however, desirable to provide transit services to highly-frequented destinations including parks. The General Plan City of Villages strategy calls for growth to be focused in mixed use villages connected by high-quality transit. To implement the General Plan and CAP mode share goals, staff recommends focusing housing, employment, and civic uses into TPAs. General Plan Policy LU-A.6 states that "some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature." The appropriate mix, intensity and location of uses is to be determined at the community plan level. Please note that the CAP TPA map is intended to serve as a citywide illustrative and does not replace the need to consult the appropriate community plan for land use recommendations.

We are in the process of updating the TPA map to reflect the revised transit system included in *San Diego Forward: The Regional Plan*, adopted by the SANDAG Board in October 2015. We would be happy to share with you the source data we requested from SANDAG for the map update.

B2-23 (cont.)

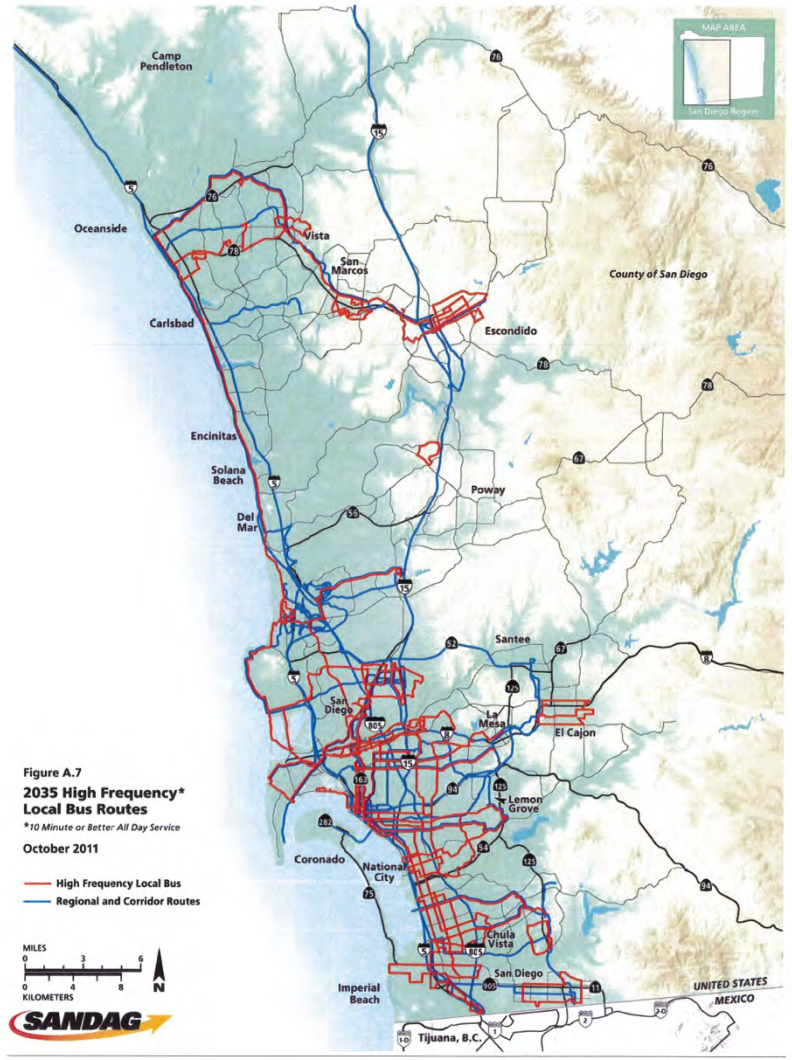
Please feel free to contact me if you would like to discuss further.

Sincerely,

Nancy

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UNITED STATES
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MAP AREA
San Diego Region
Figure A.7
2035 High Frequency* Local Bus Routes
*10 Minute or Better All Day Service
October 2011
High Frequency Local Bus
Regional and Corridor Routes
MILES
KILOMETERS
N
SANDAG

Attachment of Letter B2 (cont.)

POTTER & ASSOCIATES
PLANNING & ENVIRONMENTAL SERVICES
4975 Milton Street, San Diego, CA 92110-1252
tel: (619) 507-1415 e-mail: davidapott@aol.com

VIA E-MAIL

April 11, 2016

Mayor Kevin L. Faulconer
City of San Diego
City Administration Building
202 C Street, 11th Floor
San Diego, CA 92101

Councilmember David Alvarez, District 8
Chair, CAP Implementation Working Group
City of San Diego
City Administration Building
202 C Street, 10th Floor
San Diego, CA 92101

Re: Climate Action Plan Transit Priority Area Map

Dear Mayor Faulconer and Councilmember Alvarez:

As a planning consultant (and former Deputy Planning Director) in San Diego since 1968 and as a resident, I strongly support the strategies to achieve attainable greenhouse gas reduction targets established by the adopted Climate Action Plan (CAP) and the creation of the CAP implementation Working Group. I also support the adopted Strategic Framework Element of the General Plan. These two documents together will guide San Diego's growth in the future.

Of prime interest was the Transit Priority Area (TPA) Map included as Attachment B in the CAP. This map, along with the Strategic Framework Element, will serve during the initial phase of locating villages with high-density housing and mixed use.

A cursory review of the TPA Map, however, identified areas that do not comply with Section 21099 and 21064.3 of the California Public Resources Code; these sections were established as the basis for the Transit Priority Area Map.

Based on my finding during the cursory review, I undertook a more detailed evaluation of a number of other Transit Priority Areas.

Basis for the Transit Priority Area Map

A key land use strategy of the CAP is to reduce vehicle miles traveled by locating a majority of all new residential development within Transit Priority Areas. The CAP defines Transit Priority Area and Major Transit Stop as follows:

> SB 743 established Section 21099 of the California Public Resources Code (CPRC), which states: "Transit priority area" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."
>
> Major Transit Stop, as defined in CPRC Section 21064.3, means: a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes each having a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods.

According to the CAP the Transit Priority Area (TPA) Map included as Appendix B is based on the adopted SANDAG 2050 Regional Transportation Plan (RTP).

Resources Consulted

In reviewing the Transit Priority Area Map, the following resources were consulted:

Existing Transit

- Existing Bus Routes: http://www.sdmts.com/schedules-real-time-maps-and-routes/bus-routes
- Existing Trolley: http://www.sdmts.com/schedules-real-time-maps-and-routes/trolley

Planned Transit

- Future Transit: SANDAG 2050 Regional Transportation, Figure 1.1 2050 Revenue Constrained Transit Network, page 2-7
- Future High Frequency Bus Service: SANDAG 2050 Regional Transportation Plan, Figure A.7 2035 High Frequency Local Bus Routes, page A-45.

Areas Not Qualifying for Transit Priority Area

A review of the areas shown in Attachment B revealed a number of areas around intersecting bus routes that do not qualify as a Transit Priority Area. The primary reason these areas do not qualify is because one or both bus routes do not have a frequency of service of 15 minutes or less

during the morning and afternoon peak commute periods. These areas should not be identified as a Transit Priority Area and should be deleted from Attachment B. See areas enclosed in red on the attached map and identified by the corresponding number.

Non-qualifying areas are discussed below.

- # 1 - *Route 50 / 105 Intersect (Clairemont Drive and Burgener Boulevard)*

  The Transit Priority Area Map designates the area around Clairemont Drive and Burgener Boulevard as a Transit Priority Area. However, under current conditions neither Route 50 nor the intersecting Route 105 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have a high frequency of service in the future.

- # 2 - *Route 105 / Route "Not Numbered" Intersect (Clairemont Mesa Boulevard and Moraga Avenue)*

  The Transit Priority Area Map designates the area around Clairemont Mesa Boulevard and Moraga Avenue as a Transit Priority Area. Under current conditions the "Not Numbered" Route on Moraga does not exist and the intersecting Route 105 does not have a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," the "Not Numbered" Route on Moraga Avenue is slated to have a high frequency of service in the future; however, Route 105 is not slated to have a high frequency of service in the future.

- # 3 - *Route 41 / Route 105 Intersect (Governor Drive and Genesee Avenue)*

  The Transit Priority Area Map designates the area around Governor Drive and Genesee Avenue as a Transit Priority Area. However, under current conditions neither Route 41 nor the intersecting Route 105 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have a high frequency of service in the future.

- # 3.1 - *Genesee Avenue Between Rose Canyon and South of Route 52*

  There are no qualifying areas along Genesee Avenue between Rose Canyon on the north and ½ mile north of Clairemont Mesa Boulevard on the south. Furthermore, this area encompasses Rose Canyon and San Clemente Canyon (Marian Bear Park), which are preserved as dedicated open space where no residential uses are permitted.

- # 4 - *Route 83 / Route 10 Intersect (Washington Street and Hawk Street)*

  The Transit Priority Area Map designates the area around Washington Street and Hawk Street as a Transit Priority Area. Under current conditions Route 10 does have a frequency of service of 15 minutes during the morning and afternoon peak commute periods and will continue to do so in the future. However, Route 83 has a frequency of service of one hour during the morning and afternoon peak commute periods, and according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," the route is not slated to have a high frequency of service in the future.

- # 5 - *Route 854 / Route 115 Intersect (Lake Murray Boulevard and Jackson Drive)*

  The Transit Priority Area Map designates the area around Lake Murray Boulevard and Jackson Drive as a Transit Priority Area. However, under current conditions neither Route 854 nor the intersecting Route 115 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have a high frequency of service in the future.

- # 6 - *Route 854 / Route 115 Intersect (Lake Murray Boulevard and Navajo Road)*

  The Transit Priority Area Map designates the area around Lake Murray Boulevard and Navajo Road as a Transit Priority Area. However, under current conditions neither Route 854 nor the intersecting Route 115 have a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have high frequency of service in the future.

- # 7 - *Route 35 / Route 923 Intersect (Cable Street and Voltaire Street)*

  The Transit Priority Area Map designates the area around Cable Street and Voltaire Street as a Transit Priority Area. Under current conditions Route 35 has a frequency of service of 15 minutes during the afternoon peak commute period but not during the morning peak commute period. The intersecting Route 115 does not have a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," Route 35 is slated to have a high frequency of service in the future; however, Route 923 is <u>not</u> slated to have a high frequency of service in the future.

- # 8 - *Route 28 / Route 84 Intersect (Rosecrans Street and Canon Street)*

  The Transit Priority Area Map designates the area around Rosecrans Street and Canon Street as a Transit Priority Area. Under current conditions neither Route 28 nor the

intersecting Route 84 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," Route 28 is slated to have high frequency of service in the future; however, Route 84 is not slated to have a high frequency of service in the future.

- # 9 - *Route 28 / Route 923 Intersect (Rosecrans Street and Nimitz Boulevard)*

  The Transit Priority Area Map designates the area around Rosecrans Street and Nimitz Boulevard as a Transit Priority Area. Under current conditions neither Route 28 nor the intersecting Route 923 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," Route 28 is slated to have a high frequency of service in the future; however, Route 923 is not slated to have a high frequency of service in the future.

- # 10 - *Rosecrans Street Between Canon Street and Midway Drive*

  Based on the determination that Route 28 / Route 84 Intersect and Route 28 / Route 923 Intersect are not Major Transit Stops, there should be no designation of Transit Priority Area on Rosecrans Street between ½ mile southwest of Canon Street and ½ mile southwest of Midway Drive.

This was not a comprehensive evaluation of all of the Transit Priority Areas; hence, there may also be other non-qualifying areas.

Other Areas Not Qualifying for Transit Priority Area by Virtue of Their Location

There are intersecting bus lines and transit stops that meet the technical definition of a Major Transit Stop; however, they do not further the cause of reducing greenhouse gas emissions because of their inability to support housing at that particular location. These areas should not be identified as a Transit Priority Area and should be deleted from Attachment B. See areas enclosed in red on the attached map and identified by the corresponding letter.

Areas not qualifying by virtue of location are discussed below.

- A - *Route 8 / Route 9 Intersect (Ingraham Street and West Mission Bay Drive/Sea World Drive)*

  This Major Transit Stop is located with Mission Bay Park where housing is neither proposed nor permitted.

- B - *Transit Stop #1 in Balboa Park*

  This Major Transit Stop is located on Park Boulevard at President's Way in Balboa Park where housing is neither proposed nor permitted.

- C - *Transit Stop #2 in Balboa Park*

  This Major Transit Stop is located on Park Boulevard at the Zoo in Balboa Park where housing is neither proposed nor permitted.

- D – *Harbor Drive Between Pacific Highway and Harbor Island Drive*

  San Diego International Airport is on the north side of Harbor Drive, and port lands are on the south side of Harbor Drive. Housing is neither permitted nor proposed in either area.

- E – *Old Town San Diego State Historic Park*

  Although located adjacent to the Old Town Transit Center, the State Historic Park is intended to preserve and recreate the Mexican and early American periods. High-density housing is not compatible with the historic character of the Park.

- F – *East Side of Sixth Avenue between Upas Street and I-5*

  This area is located in Balboa Park where housing is neither proposed nor permitted.

Consequences of Including Non-qualifying Transit Priority Areas

Increasing density in areas that are not consistent with the definition of transit priority area and major transit stop would be contrary to the CAP goal, which is to promote effective land use to reduce vehicle miles traveled for the purpose of reducing greenhouse gas emissions. In fact, it would have just the opposite effect by promoting growth and increased auto use in areas not sufficiently served by transit. Furthermore, land use planning under the Strategic Framework Element would be faulty if transit is inaccurately characterized.

Showing Transit Priority Areas in areas where housing is either not proposed or permitted creates a distorted view of where growth should occur.

Recommendations

The following measures are recommended to update the Transit Priority Area Map.

- Reevaluate each and every Transit Priority Area as shown on the map in Appendix B, correct the errors, and publish a revised version.
- Include the following notation on the revised version of the Transit Priority Area Map in Appendix B:

  "See larger scale, community-specific Transit Priority Areas in updated community plans."
- Work with community planning staff and prepare larger scale community-specific Transit Priority Area Map to be included in each updated community plan.

In practice, of course, it will be necessary to do more that just identify the "availability" of transit. Truly assessing a reduction in vehicle miles traveled would include (among other things): assessing when and how transit is actually used, whether there are practical incentives to encourage transit usage, and whether the land uses that are proposed for a particular area provide an appropriate mix of uses that would allow transit to be truly effective.

I hope this letter serves to improve the effectiveness of the Climate Action Plan. Please contact me if you have any questions.

Thank you, and I look forward to hearing about efforts undertaken to update the Transit Priority Area Map.

Sincerely,

David A. Potter, AICP

cc: Council President Sherri Lightner (D1)
Councilmembers Zapf (D2), Gloria (D3), Cole (D4), Kersey (D5), Cate (D6), Sherman (D7), and Emerald (D9)
Jeff Murphy, Planning Director
Nancy Bragado, Deputy Director
Joe LaCava, Community Advocate, CAP Implementation Working Group

Attachment: Transit Priority Area Map with Non-Qualifying Areas Enclosed in Red



TRANSIT PRIORITY AREA MAP - Unqualified Areas Enclosed in Red

Letter B3

North Park Historical Society
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(619) 294-8990

Kurtis Steinert
Senior Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
San Diego, CA 92101

July 17, 2016

Subject: Cover Letter for Comments on
Draft Program Environmental Impact Report for
PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT No. 380611 / SCH No. 2013121076

Dear City Staff and Decision Makers:

B3-1 The North Park Historical Society (NPHS), an all-volunteer local 501C3 organization, has reviewed the Draft Program Environmental Impact Report for the North Park and Golden Hill Community Plan Updates dated May 31, 2016 ("PEIR"). Our detailed comments are documented in the attached letter for inclusion in the public record. Briefly, we have found that the PEIR fails

B3-2 to analyze and disclose many important issues critical to a "decision which intelligently takes account of environmental consequences" in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15151 and needs to be substantially revised and recirculated for public review.

B3-3 NPHS is most concerned about the lack of disclosure related to the "Pedestrian-Oriented Infill Development Enhancement Program" in the North Park Community Plan Update (NPCPU). This density bonus program is not related to providing higher density along transit corridors. This program targets existing two-story apartment buildings in a broad residential area between Lincoln and Howard avenues from Florida to Boundary streets for demolition and replacement with much higher density development, and potentially affects historic single family homes and bungalow courts as well. Significant impacts of this program not analyzed and disclosed in the PEIR include the following:

B3-4
- The Pedestrian-Oriented Infill Development Enhancement Program area is home to vulnerable low-income and minority populations who would be disproportionately impacted by displacement. (Census Tract 13 has much higher percentages of minorities and low-income residents than in the County as a whole, and Census Tract 9 has a much higher percentage of low-income residents.) At least 1,740 relatively affordable housing units could be lost due to the program, and more than 3,600 people may be displaced who may not be able to afford to move into other housing within the community.

B3-1 Comment noted. This is an introductory comment. The City appreciates the North Park Historical Society's (NPHS) participation in the public review comment process. The comment letter will become public record as part of the Final PEIR.

B3-2 The City does not agree that the environmental consequences of the proposed North Park CPU are not adequately analyzed in the Draft PEIR. The Draft PEIR evaluation of historical resources was based on and considered to be consistent with CEQA Section 15151. Responses to this general introductory statement are expanded on in the remainder of these responses.

B3-3 The first part of this comment includes statements about the proposed North Park CPU that are not related to the adequacy of the EIR. The City acknowledges that development within the proposed Pedestrian-Oriented Infill Development Enhancement Program areas could result in the demolition and replacement of two-story apartment buildings. The potential impacts to historical resources from build-out of the North Park CPU are fully analyzed in Section 6.7 of the Draft PEIR. Specifically, the Draft PEIR acknowledges that potentially significant and unavoidable impacts to historical resources would occur as a result of build-out of the North Park CPU and associated discretionary actions. The Draft PEIR incorporates all feasible mitigation measures available to reduce the significance of potential historical resources impacts (refer to mitigation measure 6.7-1); however, the Draft PEIR concludes that even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis.

B3-4 The City does not agree that the proposed Pedestrian-Oriented Infill Development Enhancement Program would disproportionately impact minorities and low-income residents. The proposed North Park CPU and associated discretionary actions is a policy document that provides some implementing actions but does not propose development of any specific properties. The numbers of units that would be redeveloped would depend on market conditions and individual decisions of property owners. The proposed Pedestrian-Oriented Infill Development Enhancement Program provides an incentive to developers, through a discretionary permit process, to provide higher density housing within these areas that are in close proximity to transit. The program satisfies the goals and intent of the

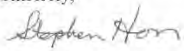
B3-5
- By specifically targeting relatively affordable housing in an area with high minority and low-income populations, the Pedestrian-Oriented Infill Development Enhancement Program is in direct conflict with San Diego General Plan direction regarding Environmental Justice and violates federal Executive Order 12898 which sets the U.S. EPA definition of Environmental Justice as fair treatment and meaningful involvement of all peoples, regardless of race, color, national origin, or income.

B3-6
- The city is not requiring any of the replacement units in the Pedestrian-Oriented Infill Development Enhancement Program area to be affordable because developers may pay an in-lieu fee if they choose. This will worsen the City's already severe deficit in affordable housing.

B3-7
- Structures built to the allowable density of 73 dwelling units/acre under the Pedestrian-Oriented Infill Development Enhancement Program in an area of historic-age single family homes and low-rise two-story apartment complexes would result in a substantial change in bulk and scale to North Park's existing authentic historic neighborhood character. This is a significant impact no amount of setbacks or design features can avoid.

B3-8 In view of the above significant impacts not documented in the PEIR (in addition to multiple other deficiencies detailed in the attached letter from NPHS), either the Pedestrian-Oriented Infill Development Enhancement Program should be eliminated from the NPCPU, or the Draft PEIR should be substantially revised to include all of the analyses discussed in the attached detailed comment letter and recirculated for another 45-day public review period.

Sincerely,



Stephen Hon, President
North Park Historical Society

c: North Park Planning Committee
Councilmember Todd Gloria
University Heights Historical Society
San Diego Housing Federation
Save Our Heritage Organisation
Chris Ward
Lara Gates, City of San Diego

B3-4 (cont.)

General Plan's City of Villages strategy and the City's Climate Action Plan. While redevelopment of existing residential land uses, by its nature, causes a temporary displacement of residents, redevelopment with higher density housing increases the housing stock available to residents and helps the City meet its housing goals.

B3-5 The City does not agree that the proposed Pedestrian-Oriented Infill Development Enhancement Program is in violation of City General Plan direction regarding Environmental Justice. The City General Plan states that the City of Villages emphasis on transit-oriented development, among other City of Villages and citywide strategies, is consistent with environmental justice goals. The proposed North Park CPU is intended to implement the City of Villages strategy, and furthers the goals specified under Section I. Environmental Justice of the General Plan's Land Use and Community Planning Element by providing a combination of land uses that improve mobility, emphasize the existing diversity of the community, and support future growth and prosperity in the plan area.

Additionally, the proposed Pedestrian-Oriented Infill Development Enhancement Program does not violate Federal Executive Order 12898, which outlines federal actions to address environmental justice in minority populations and low-income populations and calls upon federal agencies for action. Nonetheless, the City appropriately involved the public—regardless of race, color, national origin, or income—during the public review period for the PEIR, for which all public noticing requirements pursuant to CEQA were met. Furthermore, the Pedestrian-Oriented Infill Development Enhancement Program is an incentive that is offered through a Planned Development Permit which is a discretionary action that affords the public to provide input on a project.

B3-6 The City does not agree that the proposed Pedestrian-Oriented Infill Development Enhancement Program would worsen the City's affordable housing deficit. Future development projects, which would use this program, would be required to undergo a consistency review with all applicable General and Community Plan policies, including policies LU-4.6 through LU-4.10 of the North Park CPU regarding affordable housing. While providing affordable housing on-site is voluntary for developers, they would generally either be required to provide affordable housing on-site or pay an in-lieu fee. In addition, the Community Plan Enhancement Program (which includes the

B3-6 (cont.)

Pedestrian-Oriented Infill Development Enhancement Program) is separate from the State of California's Affordable Housing Density Bonus Program that is subject to the City's Affordable Housing Density Regulations in Land Development Code Chapter 14, Article 3, Division 7 and available to eligible development citywide. The affordable housing density bonus and any additional development incentive is available for use in all residential development of five or more units, using criteria and standards provided in the General Plan. It should be noted that under the City's Affordable Housing Density regulations, an applicant is ineligible for a density bonus or any incentive if the property on which the development is proposed contains, or during the five years preceding the application, contained, rental dwelling units that have had the rent restricted by law or covenant to persons and families of low income or very low income, or have been occupied by persons and families of low income or very low income, unless the proposed development replaces the affordable dwelling units, and either: (1) Provides affordable dwelling units at the percentages set forth in Section 143.0725 (inclusive of the replacement dwelling units), or (2) Provides all of the dwelling units as affordable to low income or very low income households, excluding any manager's unit(s). Thus, while provision of on-site affordable housing under the Pedestrian-Oriented Infill Development Enhancement Program would be voluntary, the City has existing regulations in place that protect low-income residents from loss of housing.

B3-7 The only historic district located within the area of the Pedestrian-Oriented Infill Development Enhancement Program is the University Heights Water Storage and Pumping Station Historic District which is listed on the National Historic Register of Historic Places for its significance related to community planning and development as well as engineering. The residences in this area not considered a historic neighborhood and are not identified as a Potential Historic District. The increase in density would not detract from any historic qualities of the University Heights Water Storage and Pumping Station as that historic district is not related to the residential character of the area. Registered historic districts and potential historic districts are identified in Section 6.7, Historic Resources, of the Draft PEIR. As discussed in Section 6.7, it is impossible to ensure the successful preservation of all potential historic districts within the North Park CPU area and potential impacts to the potential historic districts are significant and unavoidable.

B3-8 This is a concluding paragraph. See response to comment B3-7. The Draft PEIR concluded significant and unavoidable impacts to potential historic districts. The Draft PEIR does not require recirculation because no new impacts or more severe impacts have been identified. The Draft PEIR includes adequate analysis of both historical resources and impacts of the Pedestrian-Oriented Infill Development Enhancement Program.

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Kurtis Steinert
Senior Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
San Diego, CA 92101

July 17, 2016

Subject: **Comments on Draft Program Environmental Impact Report for PROJECT NAME: North Park and Golden Hill Community Plan Updates PROJECT No. 380611 / SCH No. 2013121076**

Dear City Staff and Decision Makers:

B3-9 The North Park Historical Society (NPHS) is a local, all-volunteer 501c3 non-profit organization formed in 2008. Our mission is to preserve North Park's architectural and cultural history through research, education and outreach. We cover the entire Greater North Park Community Planning Area in our projects and mission, often coordinating with our "sister" organization, the University Heights Historical Society. Our projects include conducting walking tours, publishing books about North Park's history, and achieving historical designation of districts and landmarks. This letter was approved by vote of the Board of Directors of NPHS on July 16, 2016.

B3-10 We have conducted a detailed review of the Draft Program Environmental Impact Report for the North Park and Golden Hill Community Plan Updates dated May 31, 2016 ("PEIR"). Based on our review, we find that the PEIR is not a sufficient informative document for decision makers and the public as required by California Environmental Quality Act (CEQA) Guidelines Section 15151, which states in part, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences...The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." Our detailed comments on the deficiencies of the PEIR follow a brief description of the source of NPHS's standing in the North Park and Golden Hill Community Plan Updates ("Project").

B3-9 Comment noted. The City appreciates the North Park Historical Society's participation in the public review comment process.

B3-10 The City does not agree that the Draft PEIR is insufficient. This comment does not identify a specific inadequacy in the Draft PEIR.

STANDING OF NPHS

B3-11 The standing of NPHS in the North Park Community Plan Update (NPCPU) portion of the Project is based on our activities within the Greater North Park Community Planning Area, where significant impacts from the Project would occur. Most of the residences and commercial buildings within the community planning area are of historic age, and the entire area constitutes the outdoor classroom NPHS uses to teach the importance of historical preservation and the unique story of North Park's historical resources. Specifically, we conduct a popular walking tour in the commercial area along University Avenue at 30th Street, which the NPCPU has zoned for a density of 109 dwelling units per acre (du/ac) and buildings of unlimited height. This area has been identified as a potential commercial historic district by the City's historical resources consultant, and was identified by NPHS as one of our highest priorities for designation.

B3-12 NPHS also conducts a walking tour called "The Streetcar Suburb at Hamilton Street," which covers development patterns and historic resources in an area extending from Arizona Street to Utah Street and Wightman Street to Howard Avenue. Much of this part of the historic University Heights subdivision has been identified in the NPCPU as the "Pedestrian-Oriented Infill Development Enhancement Program Area," where development up to 73 du/ac, nearly twice the NPCPU zoned density of 44 du/ac, is encouraged for projects where 6 or more units are proposed. The starting point for our Hamilton Streetcar Suburb walking tour is the North Park Water Tower at Howard Avenue between Oregon and Idaho Streets. We recently achieved listing of the Water Tower and surrounding district of water infrastructure in the National Register of Historic Places as well as in the City's list of designated historic resources. Properties adjacent to the Water Tower parcel have a proposed density of 54 du/ac and a 50-foot height limit; properties east and west of the community park, which was once a 17.5-million-gallon, partially buried water reservoir and thus is part of the historic district, have a proposed density of 73 du/ac and 60-foot height.

B3-13 The historical character and integrity of the Greater North Park Community Planning Area is of great concern to NPHS. Without the outdoor classroom, the story of North Park, a living example of a historic walkable community, will become abstract, remote, and of little concern to people. Our walking tours are the principal way we engage the community and create members and donors. Walking tours and other related activities provide the revenue and community exposure NPHS needs to thrive as an all-volunteer non-profit organization and, most importantly, accomplish our mission. Through our mission and activities, NPHS has a clear, present, and beneficial right to the City adequately carrying out its duties as Lead Agency and meeting the requirements of CEQA for the Project. We appreciate the opportunity to enter into the administrative record our comments on the PEIR for the North Park and Golden Hill Community Plan Updates.

COMMENTS ON EXECUTIVE SUMMARY

Section S.3: Areas of Controversy

B3-14 The PEIR states that there are no clear-cut areas of controversy. This is false. NPHS and the University Heights Historical Society have written multiple letters objecting to the Pedestrian-

B3-11 The area that this comment refers to is depicted as the 30th Street Commercial District in Figure 6.7-4 of the Draft PEIR which is identified as the 30th Street Commercial Potential Historic District in the proposed North Park CPU (see Figure 10-3). There are height regulations in this area. The maximum height allowed within the CC-3-9 zone that is proposed for this area is governed by maximum floor area ratio (FAR). For a stand-alone commercial structure, the maximum FAR is 2.0. If a project incorporates residential and is considered a mixed-use building, a FAR of 5.0 can be achieved. However, the proposed supplemental development regulations would not apply to commercial structures within a Potential Historic District. Thus, the Draft PEIR concludes that impacts to potential historical districts would be significant and unavoidable.

B3-12 The area that this comment refers to is depicted as the University Heights Water Storage and Pumping Station in Figure 6.7-4 of the Draft PEIR. This comment does not identify an inadequacy in the analysis presented in the Draft PEIR.

B3-13 This comment does not identify an inadequacy in the analysis presented in the Draft PEIR. The City appreciates the NPHS's participation in the public review process. All comments will be considered during the decision-making process.

B3-14 Section S.3 Areas of Controversy has been updated to acknowledge these concerns.

Oriented Infill Development Enhancement Program, which would allow developers to propose up to 73 du/ac, and previous variations of this density bonus program, as well as other substantial increases in density. Specifically, in our letter to Marlon Pangilinan dated August 10, 2015, we stated:

> "... NPHS would like to take issue with the Incentive Zoning Program outlined in Sections 2.0 and 12.0 of the NPCPU. It is our view that a Community Plan is utilized to custom tailor a city's general ordinances and zoning policies to specific communities within the city in order to more closely reflect what would best suit that community. Offering zoning bonuses to gain public amenities from developers blunts the whole point of having an idealized community plan. We would strongly suggest other incentives for the inclusion of public amenities be found; such as the Mills Act property tax incentive program for Historical Resources."

We restated our opposition to the density bonus program in our letter to Lara Gates dated February 19, 2016, requesting "that the City does not include zoning bonuses of any kind in the NPCPU." In addition, NPHS expressed deep concerns about other zoning changes, as follows:

> "NPHS is fearful that our neighborhood's small historic village character is at risk due to proposed changes to the current zoning ordinances. These changes are embedded in the revised zoning area designation assigned to the various zones throughout the North Park community...In residential zones the proposed zoning revisions will essentially allow developers to construct buildings with higher densities and larger building envelopes (taller and bulkier) throughout all areas of North Park with the exception of low density residential areas where zoning remains unchanged (RS-1-7) and low/medium density residential areas where zoning remains mostly unchanged (RM-1-1) other than an increase in FAR from 0.40 to 0.75. These zoning changes will affect approximately 50% of all residential zones in North Park."

Furthermore, in a letter to Lara Gates dated April 11, 2016, the University Heights Historical Society (UHHS) stated, "We are opposed to changes that put our irreplaceable historic resources at risk and believe that an area of North Park is at very high risk due to the proposed North Park Community Plan Update, as of March 30, 2016...The proposed Pedestrian-Oriented Infill Development Enhancement Program will put a significant number of historic properties at risk..." Among other conclusions, UHHS requested that the city:

- "Eliminate the proposed Pedestrian-Oriented Infill Development Enhancement Program allowing up to 73 du/ac, and maintain the zoning for this area as RM-3-7 (30-44 du/ac).
- Change the zoning along Georgia Street (west side) and Howard Avenue (north side) from RM-3-8 (45-54 du/ac) to RM-3-7 (30-44 du/ac).
- Maintain a 35-foot height limit in all residential areas."

This record of opposition to key aspects of the NPCPU should have been noted in Section 8.3, in particular the opposition to various incarnations of the density bonus program extending from Lincoln to Howard avenues and Florida to Boundary streets, identified in the Project as the "Pedestrian-Oriented Infill Development Enhancement Program Area."

Section S.4: Project Alternatives

B3-15 On page S-5, the Transit-Oriented Enhancement Area is discussed, but the Pedestrian-Oriented Infill Development Enhancement Program Area is not. A description similar to the discussion of the Transit-Oriented Enhancement Area should be added.

B3-16 On page S-6, the Pedestrian-Oriented Infill Development Enhancement Program Area and Transit-Oriented Enhancement Area should be specifically named as being eliminated in the discussion of the Lower-Density Alternative.

B3-17 On page S-6 and continuing to page S-7, the conclusion that "there is no environmentally superior alternative as compared to the proposed North Park CPU for this Program EIR" is not consistent with the conclusion on page 11-25 in Section 11.4 *Environmentally Superior Alternative for North Park CPU*, which states, "Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the proposed North Park CPU goals and objectives, the environmental [sic] superior alternative as compared to the proposed North Park CPU for this Program EIR is the Lower-Density Alternative." This inconsistency should be corrected.

COMMENTS ON CHAPTER 1: INTRODUCTION

B3-18 **Section 1.3.2: PEIR Scope and Content - Population and Housing**

In Section 1.3.2, the PEIR lists the issues determined during the scoping process to have the potential to result in significant environmental impacts. Missing from the list is Population and Housing, topic XIII in CEQA Appendix G: Environmental Checklist Form. The three Checklist questions under this topic are the following:

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

B3-19 In the City's initial project review, the answer to these questions should have been yes, potentially significant impacts to population and housing could occur. A specific section on impacts to population and housing should have been included in the PEIR, as explained below.

On page 1-5 of the PEIR, impacts of the Project are declared to be "assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of each proposed CPU compared to existing ground conditions." This is the correct choice for environmental analysis in the PEIR, especially considering CEQA Guidelines Section 15378 identifies "enactment and amendment of zoning ordinances" as a Project under

B3-15 A brief description of the Pedestrian-Oriented Infill Development Enhancement Program has been added to page S-5.

B3-16 A statement regarding the elimination of the Transit-Oriented Development Enhancement Program and Pedestrian-Oriented Infill Development Enhancement Program from the Lower-Density Alternative has been added to page S-6.

B3-17 Page S-6 has been revised to be consistent with Section 11.4, Environmentally Superior Alternative for North Park CPU.

B3-18 The exclusion of the Population and Housing CEQA topic was not in error as it was not determined to result in significant environmental impacts during the scoping process and, therefore, was not included in the list in Section 1.3.2 of the Draft PEIR. Refer to Section 8.3 of the Draft PEIR for a discussion on effects found not to be significant related to population and housing.

B3-19 This comment does not identify an inadequacy in the analysis presented in the Draft PEIR. The Draft PEIR does complete a plan-to-ground analysis as required by CEQA. Refer to the response to comment B3-20 regarding the population and housing impacts analysis.

CEQA. A plan-to-ground analysis of impacts to population and housing would reveal the following conclusions:

B3-20 Question a: Table 3-12 on page 3-36 of the PEIR shows the current household population of the North Park CPU area to be 46,420. Table 11-3 on page 11-5 of the PEIR shows the estimated future population under the existing Community Plan to be 68,610, which is 48 percent higher than the current population. Table 11-4 on page 11-6 of the PEIR shows the estimated future population under the NPCPU to be 73,170, which is 58 percent higher than the current population. Thus, there is a 10 percent increase in future estimated population induced by the policies and programs in the NPCPU. This population change is substantial. This issue should have been analyzed in a detailed Population and Housing section and the significant impact disclosed to decision makers and stakeholders.

B3-21 Questions b and c: Table 3-12 on page 3-36 of the PEIR indicates there would be 680 fewer single-family homes and 12,225 additional multi-family homes with build out of the NPCPU compared to existing conditions. In a plan-to-ground analysis, this is a reduction of 12 percent in single family units and an increase in multi-family units by 64 percent induced by the policies and programs in the NPCPU. Clearly, the loss of existing single family housing represents substantial displacement of existing housing and people living in those residences. But less obviously, the increase in multi-family units represents displacement of existing units and people as well. This is because the increase in the number of multi-family units is encouraged by policies and programs in the NPCPU to be generated by demolition of existing two-story apartment buildings to create dense development of 73 du/ac and higher.

For example, within the Pedestrian-Oriented Infill Development Enhancement Program area described on page 30 of the proposed North Park Community Plan, "applicants with existing development projects of 6 dwelling units or more in Multi-Family Residential areas designated as Medium High up to 44 dwelling units per acre within the area located between Lincoln Avenue and Howard Avenue" are offered the incentive of being allowed to build with the density range increased up to 73 du/ac from maximum planned zoning of 44 du/ac. The following analyses are missing from the PEIR and should be disclosed in a detailed Population and Housing section to decision makers and stakeholders:

B3-22
- It is not clear that the language on page 30 of the NPCPU would only target "Huffman" type multi-family buildings. The broad language referencing "development projects" could also encourage loss of bungalow courts or even single-family residences because a developer could purchase and demolish the existing structure(s), and then propose a 6+ unit redevelopment on such properties. The analysis should address the broad range of scenarios that could result from this language, including loss of all single-family homes and bungalow courts in the Pedestrian-Oriented Infill Development Enhancement Program area.

B3-23
- The analysis should separately address the loss of two-story apartments that are the intended target of the Pedestrian-Oriented Infill Development Enhancement Program. The analysis should address the fact that based on the "Huffman Development Map Central" figure provided in the February 16, 2016 Draft North Park Community Plan

B3-20 As discussed in Section 8.3 of the Draft PEIR, though population will increase over time, the population growth would not introduce a significant impact on the environment. While housing and residents would be temporarily displaced when redevelopment of older housing stock occurs, the net result is additional housing and a diversity of housing types to serve the housing needs of the City within an urbanized area suitable for increased densities. The proposed CPUs are intended to manage and accommodate projected growth, and would not induce population growth.

B3-21 As discussed in Section 8.3 of the Draft PEIR, the proposed CPUs would not displace people or existing housing that would necessitate the construction of replacement housing elsewhere. Rather, the number of residential units in the CPU areas may increase as a result of build-out of the CPUs. Additionally, the proposed CPUs are policy-level documents and do not propose specific development projects and the Draft PEIR is not intended to evaluate project level impacts. As discussed in response to comment B3-4, redevelopment of existing residential land uses, by its nature, causes a *temporary* displacement of residents; however, in-place redevelopment with higher density housing increases the housing stock available to residences and helps the City meet its housing goals.

B3-22 As stated on page 30 of the proposed North Park CPU, the Pedestrian-Oriented Infill Development Enhancement Program is only available to applicants with existing development projects of 6 dwelling units or more in Multi-Family Residential areas designated as Medium high up to 44 dwelling units per acre. Therefore, the Pedestrian-Oriented Infill Development Enhancement Program does not have the potential to result in the loss of existing single-family homes in the program area.

B3-23 See response to comments B3-4 and B3-21. The Pedestrian-Oriented Infill Development Enhancement Program of the proposed North Park CPU would not result in a displacement of a substantial amount of housing. Housing sites that would be redeveloped would be replaced with higher density housing in the same location and would not result in significant environmental impacts associated with the need to develop replacement housing elsewhere. Rather, the number of residential units would increase as the program is intended to incentivize higher density infill development via a discretionary Planned Development Permit process.

Update presentation by the City of San Diego Planning Department and posted on the city's website at https://www.sandiego.gov/sites/default/files/np_presentation.pdf, there are approximately 290 "Huffman" type buildings within the Pedestrian-Oriented Infill Development Enhancement Program area and an additional 27 such buildings in the area zoned for 73 du/ac adjacent to the community park. Displacement of buildings for higher density units in this part of North Park would represent the loss of 317 existing multi-family buildings (at least 1,902 units at 6 units per building) and 3,975 people (based on 2.09 persons per household as reported on page 6.13-3 of the PEIR). The loss would likely be much greater because "Huffman" type apartments typically have eight to ten units, not just six.

B3-24

- The analysis should note that on a broader scale, the city estimated there are approximately 1,000 "Huffman" buildings north of Upas Street, representing at least 6,000 housing units and more than 12,500 people. Therefore, the Pedestrian-Oriented Infill Development Enhancement Program targets displacement of approximately one-third of this housing supply.

B3-25

Population and housing displacement is particularly important to analyze and disclose because there are vulnerable populations within the areas targeted for density increases. For example, demographic data for Census Tract 13.00, which is bounded by University Avenue and El Cajon Boulevard on the south and north, and Arizona and Iowa streets on the west and east, indicate approximately 36 percent of residents are Hispanic, 35 percent are white (non-Hispanic), and 16 percent are Black (non-Hispanic). Also, 21 percent of the residents are below the federal poverty level. In Census Tract 9.00, bounded by University Avenue and El Cajon Boulevard on the south and north, and Park Boulevard and Arizona Street on the west and east, the ethnic mix is 61 percent white, but 23 percent of the residents are below the federal poverty level (data from the website gis.oshpd.ca.gov). In San Diego County as a whole, demographic data reflect the population is approximately 33 percent Hispanic, 5 percent Black, and 15 percent below poverty level. Therefore, Census Tract 13.00 has much higher percentages of minorities and low-income residents than in the County as a whole, and Census Tract 9.00 has a much higher percentage of low-income residents. These two Census Tracts encompass most of the Pedestrian-Oriented Infill Development Enhancement Program area, so the potential for these vulnerable populations to disproportionately experience the adverse impacts of displacement should be analyzed and disclosed to decision makers and stakeholders.

B3-26

Potential impacts to population and housing require analysis, disclosure, and mitigation. Correcting this deficiency in the PEIR will require the addition of "significant new information" under CEQA Guidelines Section 15088.5(a)(1). Adequate analysis will reveal that (1) new significant environmental impacts would result from the Project in areas where substantial increases in density resulting from changes in zoning and incentives (in particular within the Pedestrian-Oriented Infill Development Enhancement Program area) would lead to the displacement of substantial numbers of housing units and people, many of whom represent vulnerable populations; (2) new mitigation measures would be needed; and (3) not providing this new information and recirculating the PEIR would deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project.

B3-24 See response to comment B3-23.

B3-25 See response to comments B3-4, B3-5, and also response to comment B2-6.

B3-26 Though the identification of new potential impacts would require recirculation of the PEIR, the City does not agree that the proposed CPUs would result in potential impacts related to population and housing. The NPHS asserts that build-out of the proposed North Park CPU would result in an impact due to displacement of housing. However, per checklist questions b) and c) in Topic XIII of CEQA Appendix G, a project may have potential impacts to population and housing if it would displace substantial numbers of existing housing or people, *"necessitating the construction of replacement housing elsewhere."* While redevelopment, by nature, causes a temporary housing displacement, redevelopment with higher density housing increases housing stock available *on the same site,* and helps the City to meet its housing goals. No replacement housing elsewhere would be required and associated environmental impacts with developing housing in a new location would be avoided. The proposed North Park CPU would provide for additional housing opportunities within an urbanized area suitable to increased density. Additional discussion explaining the significance conclusion for population and housing (as discussed in this response) has been added to Section 8.3 of the Final PEIR. This discussion is clarification and does not identify new potential impacts or substantial new information that would require recirculation.

If the City decides not to recirculate the PEIR, under CEQA Guidelines Section 15088.5(e) that decision "must be supported by substantial evidence in the administrative record."

Section 1.3.3: PEIR format

B3-27 On page 1-7, the contents of Chapter 8 *Effects Found Not to Be Significant* are not correctly identified. As discussed above, Population and Housing should be specifically analyzed in detail in a separate section in Chapter 6. Also, "Agriculture" should be identified as "Agricultural Resources." Energy should not be listed as being within Chapter 8; Energy Conservation is addressed in Section 10.3 and there is no other stand-alone energy impacts analysis section.

Section 1.4.1: Draft PEIR

B3-28 On page 1-8, the PEIR states, "Thus, a 59-day comment period is applicable to the North Park and Golden Hill Community Planning Groups only." This statement is incorrect. The extended review period applies to all commentors, based on email communication from the Deputy Director of Environment and Policy Analysis that NPHS received on June 15, 2016.

COMMENTS ON CHAPTER 2: ENVIRONMENTAL SETTING

B3-29 This chapter is missing data on the economic, social, and housing factors within the NPCPU area that are the important basis for preparing an adequate Population and Housing environmental analysis section and determining if economic or social effects of the Project would result in physical changes. CEQA Guidelines Section 15131(c) states that:

> "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project."

Although CEQA Guidelines Section 15131 notes that economic or social information "may be presented in whatever form the agency desires," the Guidelines also state that the information "may be included in an EIR." Therefore, Chapter 2 would be an appropriate and convenient place to present such information.

COMMENTS ON CHAPTER 3: PROJECT DESCRIPTION

Section 3.1: Introduction

B3-30 According to this section and specifically the Project components listed in Table 3-1 on page 3-1 of the PEIR, adoption of the North Park Impact Fee Study is included in the "associated regulatory documents and actions" that constitute the Project. However, the North Park Impact Fee Study was not included in the CPU and was not made available in any form when the PEIR was distributed for public review. Therefore, decision makers and stakeholders have been

B3-27 Section 1.3.3, PEIR format, has been corrected to include the effects found not to be significant per Chapter 8 of the Draft PEIR. Population and Housing is included in Chapter 8 because the project would result in less than significant impacts related to this issue area. Additional discussion was added to the discussion of Population and Housing in Chapter 8, in response to comments received.

B3-28 The referenced statement was removed from the Final PEIR. All members of the public and planning groups were provided the extended 59-day opportunity to comment on the project.

B3-29 Economic, social, and housing conditions of the North Park CPU areas are described in the proposed North Park CPU, specifically in the Introduction and Land Use and Economic Prosperity Elements. See response to comment B2-6.

B3-30 The Draft North Park Impact Fee Study (IFS) for Fiscal Year 2017 is publicly available on the City's website via the North Park Community Plan Update webpage (https://www.sandiego.gov/planning/community /profiles/ greaternorthpark/) and the Upcoming Public Facilities Financing Plans/Impact Fee Studies webpage (https://www.sandiego.gov/ facilitiesfinancing/plans) as of August 9, 2016. It can also be accessed through the following direct link: https://www.sandiego.gov/sites/ default/files/fy_2017_north_park_ifs_-_08-09-2016_draft_2.pdf. The purpose of the IFS is to provide a list of facilities that are needed to implement the goals of the community plan, and to develop applicable Development Impact Fees (DIFs) pursuant to the California Government Code through which new development will pay its proportional fair-share of the cost of those facilities based on a clear nexus. Facilities identified in the IFS are identified in the proposed CPU; thus, the public was not deprived of an opportunity to comment on the project as a whole. The IFS functions as an implementation document of the City of San Diego's General Plan and the North Park Community Plan. The North Park IFS is listed as one of the project components because it is an implementing document for the proposed CPU since it would establish the DIFs that would be paid as future development occurs within the CPU area. However, specific projects listed within the IFS would require their own future environmental review prior to construction. The purpose of the Draft PEIR was not to evaluate and

deprived of the opportunity to review and comment on an essential component of the Project. Furthermore, it is unknown if the completed Impact Fee Study was made available to PEIR preparers, or if conclusions made about the Impact Fee Study throughout the PEIR were generalizations and suppositions not supported by documentation in the public record. It is impossible to know if adverse environmental effects would result from the Impact Fee Study, or if this discretionary action would provide feasible mitigation for other adverse effects.

B3-31 The Impact Fee Study must be added to the PEIR. In accordance with CEQA Guidelines Section 15088.5(a)(4), the Impact Fee Study represents "significant new information" requiring recirculation of the PEIR because the Impact Fee Study is identified in Table 3-1 as an essential component of the Project but could not have been analyzed because it was not provided with the PEIR, thus rendering this aspect of the PEIR "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

If the City decides not to recirculate the PEIR, under CEQA Guidelines Section 15088.5(e) that decision "must be supported by substantial evidence in the administrative record."

Section 3.4: Project Description

B3-32 On page 3-3, the PEIR states that CPU implementation requires, among other items, "a comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new Impact Fee Study for each community." As commented above for Section 3.1, the North Park Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review. The completed North Park Impact Fee Study must be added to the PEIR, and detailed environmental analysis must be conducted on this aspect of the Project beyond unsubstantiated statements made at various locations in the PEIR.

B3-33 On pages 3-4 through 3-7, in Section 3.4.1.1.a *Land Use Element, Land Use Designations*, multiple inconsistencies between density ranges in the text and on Figure 3-1 and in Table 3-2 should be corrected. These include the following:

- Residential - Very High: the text on page 3-4 states the density range is 75 du/ac and above; the density range is 55-73 du/ac on Figure 3-1 and Table 3-2
- Residential - High: the text on page 3-4 states the density range is 45 to 74 du/ac; the density range is 45-54 du/ac on Figure 3-1 and Table 3-2
- Residential - Medium: the text on page 3-7 states the density range is 15 to 29 du/ac; the density range is 16-29 du/ac on Figure 3-1 and Table 3-2
- Residential - Low Medium: the text on page 3-7 states the density range is 10 to 14 du/ac; the density range is 10-15 on Figure 3-1 and Table 3-2.

B3-34 On page 3-18 continuing on page 3-19, in Section 3.4.1.11 *Implementation*, Impact Fee Studies are referenced as "identifying the capital improvements and other projects necessary to

B3-30 (cont.)

disclose the impacts associated with constructing needed facilities described in the IFS. Rather, the Draft PEIR discloses the impacts of build-out of the North Park CPU on the need for public facilities and relies on the DIFs outlined in the IFS as a framework for ensuring future development provides their fair share of funding to support future facility improvements.

B3-31 The purpose of an IFS is to provide a list of facilities needed to implement goals of a community plan and to develop applicable Development Impact Fees. The facilities in the IFS are identified in the CPU policy framework which is evaluated in the Draft PEIR, thus the IFS does not represent significant new information. For example, the proposed North Park CPU Public Facilities, Services and Safety Element include policies that identify specific facility needs such as establishing a City of San Diego Police Community Relations Office in the hub of the community near 30th Street and University Avenue and/or a to be determined location on El Cajon Boulevard (PF-11.2d) and supporting the relocation of the University Heights Library to the Normal Street Teachers Annex (PF-1.6). The Impact Fee Study is intended as an implementation tool for the proposed North Park CPU. The Draft North Park Impact Fee Study is currently available online. See also response to comment B3-30.

B3-32 See response to comments B3-30 and B3-31. Specific projects identified in the IFS would require their own subsequent environmental review when the project is brought forward; thus, additional analysis is not required at this time.

B3-33 The density ranges included in the text were made in error and the Final PEIR has been updated to include the correct densities, consistent with the proposed CPUs.

B3-34 See response to comments B3-30 and B3-31.

accommodate present and future community needs," as identifying "facilities and other public improvements" and as identifying "unfunded needs" in the community. Therefore, the North Park Impact Fee Study is essential for evaluating impacts to issues such as public utilities and services. But as commented above for Section 3.1, the North Park Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review.

B3-35 On pages 3-20 through 3-25 in Section 3.4.3.1 *Citywide Rezoning*, several inconsistencies between zone codes in the text and on Figure 3-6 and Table 3-4 should be corrected. These include the following:

- Table 3-4 lists Proposed Zones RM-2-4, RM-2-6, and RM-2-7, which are not in the legend for Figure 3-6 or defined in the text on page 3-25
- Table 3-4 does not include Proposed Zone RM-3-7, which is on Figure 3-6 and described on page 3-25

Table 3-4 footnotes on page 3-24 should include information about the density increases allowed by the Pedestrian-Oriented Infill Development Enhancement Program, similar to the footnotes provided about the Transit-Oriented Development Enhancement Program.

B3-36 On pages 3-28 and 3-29, Section 3.4.4 *Impact Fee Studies* briefly describes the updated Impact Fee Studies and states that a complete list of projects is included in the documents. As commented above for Section 3.1, the North Park Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review. The completed North Park Impact Fee Study must be added to the PEIR, and detailed environmental analysis must be conducted on this aspect of the Project beyond conclusory and unsubstantiated statements made at various locations in the PEIR.

Section 3.5.6: Diversity and Affordability of Housing

B3-37 This section on page 3-31 of the PEIR should also discuss Residential Infill Policy LU-4.20, which states, "Encourage the redevelopment of multi-family housing built between 1960 and 1980." This type of housing is already relatively affordable, and the policies described in NPCPU Section 2.8 *Community Enhancement Program - Pedestrian-Oriented Infill Development Enhancement Program* specifically target such units for replacement with higher density and potentially more expensive units that existing residents would likely not be able to afford. It should also be disclosed in this section of the PEIR that the City is not requiring any of the replacement units in the Pedestrian-Oriented Infill Development Enhancement Program area to be affordable because developers may pay an in-lieu fee if they choose. This will worsen the City's already severe deficit in affordable housing.

B3-35 The Final PEIR has been corrected accordingly.

B3-36 See response to comments B3-30 and B3-31.

B3-37 Section 3.5.6, Diversity and Affordability of Housing, of the Draft PEIR is intended to provide a discussion on the design considerations incorporated into the proposed North Park CPU policies related to the production and encouragement of affordable housing units. It is not the location to provide an analysis of potential impacts to affordable housing. See also response to comment B3-6.

COMMENTS ON CHAPTER 4: HISTORY OF PROJECT CHANGES RELATED TO CEQA

Section 4.3: Changes Based on Comments on the Draft Community Plans

B3-38 In Section 4.3 on page 4-2, the PEIR states, "The recommended density changes have been supported by the community group, incorporated into the proposed North Park CPU, and analyzed in this PEIR." This statement does not reflect a "good-faith effort at full disclosure" required by CEQA Guidelines Section 15003(i). Section 4.3 should disclose that multiple stakeholder organizations and residents have repeatedly opposed aspects of increased density in the CPU. Specifically, as commented on Section 8.3 above, NPHS and the University Heights Historical Society have written multiple letters objecting to the Pedestrian-Oriented Infill Development Enhancement Program, which would allow developers to propose up to 73 du/ac, and previous variations of this density bonus program, as well as other substantial increases in density.

COMMENTS ON CHAPTER 5: REGULATORY FRAMEWORK

Section 5.1.1.1: Land Use and Community Planning Element

B3-39 This section should add discussion on page 5-4 regarding Environmental Justice to explain that Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Population, signed on February 11, 1994 focused attention on the environmental and human health conditions in minority and low-income communities to enhance the provision of nondiscrimination and to promote meaningful opportunities for participation in matters relating to minority and low-income communities and their environment. This regulatory information about Environmental Justice is important background for analysis that needs to be added to Section 6.1 regarding how the Pedestrian-Oriented Infill Development Enhancement Program is inconsistent with federal Executive Order 12898 as well as San Diego General Plan direction regarding environmental justice.

COMMENTS ON CHAPTER 6: ENVIRONMENTAL ANALYSIS - NORTH PARK

Section 6.1: Land Use

B3-40 Section 6.1.3 *Impact Analysis* does not provide a "plan-to-ground" analysis as stated on page 1-5 of the PEIR. The goals and recommendations of the NPCPU are concluded on page 6.1-5 of the PEIR to be "consistent with development design guidelines, other mobility and civic guidelines, and programs in accordance with the general goals stated in the General Plan" without any supporting documentation or analysis.

Consistency with the General Plan policies in Section 6.1.3.a *City of San Diego General Plan* should include detailed analysis of issues related to General Plan policies listed in Section 5.1.1.1 on page 5-4, including that planned density of residential land uses is not completely within appropriate locations, the Impact Fee Study was not included in the NPCPU, and the Pedestrian-

B3-38 This comment does not raise an issue with regard to the adequacy of the Draft PEIR; however, a qualifying statement has been added to the sentence to clarify that not every community comment was addressed through changes to the CPUs.

B3-39 Executive Order 12898 calls on federal agencies to address environmental justice issues. Section 5.1.1, Land Use and Community Planning Element, discusses goals and policies included in the City's General Plan. Therefore, Section 5.1.1 is not an appropriate location to discuss the executive order. Refer also to response to comment B3-4, B3-5, and also response to comment B2-6 regarding the adequacy of the Draft PEIR related to environmental justice issues.

B3-40 The City does not agree that the statement on page 6.1-5 is without supporting analysis. Section 6.1.3, Impact Analysis, Issue 1, Conflicts with Applicable Plans, a) City of San Diego General Plan provides a consistency analysis for each element of the proposed North Park CPU with that of the General Plan, including the Land Use Element; Mobility Element; Urban Design Element; Economic Prosperity Element; Public Facilities, Services, and Safety Element; Recreation Element; Sustainability and Conservation Element; Noise and Light Element; Historic Preservation Element; and Arts and Cultural Element. In the case of conflicts with applicable plans, this analysis of consistency with plans is the appropriate analysis. If the project is consistent with the stated plans then it would not result in any secondary or indirect environmental impacts.

See also response to comments B3-30 and B3-31 regarding the Impact Fee Study and response to comment B3-5 regarding the Pedestrian-Oriented Infill Development Enhancement program and environmental justice.

B3-41 Oriented Infill Development Enhancement Program violates Executive Order 12898 and the U.S. EPA definition of Environmental Justice. As examples, an analysis will reveal the following:

- The NPCPU is not consistent with the third listed goal for "Community plans that maintain or increase planned density of residential land uses in appropriate locations" because multiple stakeholders have repeatedly informed the City during the planning process that the Pedestrian-Oriented Infill Development Enhancement Program Area is an inappropriate location for density bonuses allowing up to 73 du/ac.

- The NPCPU distributed with the PEIR for public review is not consistent with the fourth listed goal for "Community plan updates that are accompanied by updated IFS (formerly known as PFFPs)" because the Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review.

- The NPCPU is in direct conflict with General Plan direction regarding Environmental Justice and violates federal Executive Order 12898, because the NPCPU contains specific policies targeting the replacement of existing multi-family housing units in Census Tract 13.00, which has much higher percentages of minorities and low-income residents than in the County as a whole, and Census Tract 9.00, which has a much higher percentage of low-income residents. These two Census Tracts encompass most of the Pedestrian-Oriented Infill Development Enhancement Program area. This aspect of the NPCPU will create the potential for disproportionate displacement of vulnerable populations and therefore is not consistent with the U.S. EPA definition of Environmental Justice as fair treatment and meaningful involvement of all peoples, regardless of race, color, national origin, or income.

- The NPCPU is not consistent with Project Objective 2 on page 3-3, which states, "Maintain or increase the housing supply through the designation of higher residential densities focusing along major transit corridors." The Pedestrian-Oriented Infill Development Enhancement Program area is not focused along a major transit corridor such as University Avenue or El Cajon Boulevard.

- The NPCPU is not consistent with its own policies, including LU-4.1 listed on Table 6.1-1 on page 6.1-6, which states, "Maintain the low density character of predominantly single family areas, outside of the designated higher density areas primarily located along El Cajon Boulevard and University Avenue, and encourage rehabilitation where appropriate." The Pedestrian-Oriented Infill Development Enhancement Program would eliminate existing low density character in this predominantly single family residential area which is outside of University Avenue and El Cajon Boulevard.

B3-42 Consistency with the General Plan policies also should include detailed analysis of issues related to General Plan policies in Section 5.12 *Public Services and Facilities* on page 5-50. An analysis will reveal the following:

- The NPCPU is not consistent with General Plan Public Facilities Element policies specifying that Impact Fee Studies should be completed concurrent with preparation of

B3-41 The City does not agree that the Pedestrian-Oriented Infill Development Enhancement Program is inconsistent with the goal that community plans must maintain or increase planned density of residential land uses in appropriate locations. While it is impossible to incorporate all opinions and needs of all stakeholders into the CPU process, the City will consider all comments in the decision-making process.
See response to comments B3-30 and B3-31 regarding the Impact Fee Study.

See response to comments B3-5 and B-39 regarding the proposed North Park CPU's consistency with environmental justice goals.

The City does not agree that the proposed North Park CPU is inconsistent with Project Objective 2, as the Transit-Oriented Development Enhancement Program included in the proposed CPU would encourage higher residential densities along the Bus Rapid Transit Corridor (along Park Boulevard and El Cajon Boulevard).

The last statement in the last bullet point of this comment is incorrect. As discussed in response to comment B3-22, the Pedestrian-Oriented Infill Development Enhancement Program is only available to applicants with existing development projects of 6 dwelling units or more in Multi-Family Residential areas designated as Medium high up to 44 dwelling units per acre. Thus, the program would not result in the loss of existing single-family homes or low density character of the program area. See also response to comment B2-6.

B3-42 See response to comments B3-30 and B3-31 regarding the IFS.

Community Plan updates because the Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review.

B3-43 Table 6.1-2 on page 6.1-11 does not define zone RM-3-7, which is on Figure 3-6.

B3-44 The discussion on page 6.1-13 does not provide any analysis to support the conclusion that the NPCPU "furthers the goals for addressing environmental justice in the North Park Community." Socioeconomic data should be included in the PEIR to provide the basis for analysis. As commented above, an analysis of Census Tracts where relatively affordable existing housing is specifically targeted for replacement by the Pedestrian-Oriented Infill Development Enhancement Program will reveal that there is the potential for disproportionate displacement of vulnerable populations; therefore, this aspect of the NPCPU is not consistent with the U.S. EPA definition of Environmental Justice.

Table 6.1-3 on page 6.1-16 is missing a definition for MR-2500.

Table 6.1-4 *Proposed Citywide Zones* lists RM-2-7, which is not on Figure 3-6.

Table 6.1-4 does not list RM-3-7, which is on Figure 3-6.

B3-45 Table 6.1-4 should disclose information about the densities allowed by the Pedestrian-Oriented Infill Development Enhancement Program, similar to the information presented for the Transit-Oriented Development Enhancement Program.

B3-46 The discussion on page 6.1-18 in Section 6.1.3.d *San Diego Forward – the Regional Plan* does not provide any analysis to support the conclusion that the community villages "would reduce reliance on the automobile and promote walking and use of alternative transportation." In particular, there is no information presented regarding how the NPCPU would reduce work related trips or increase bus transit use.

B3-47 The conclusions in Section 6.1.4 *Significance of Impacts, Issue 1 Conflicts with Applicable Plans* should be revised to disclose inconsistencies with the General Plan and San Diego Forward - the Regional Plan and identify potential significant impacts as discussed in the comments above, as well as any other inconsistencies identified by conducting a thorough "plan-to-ground" analysis.

Section 6.2: Visual Effects and Neighborhood Character

B3-48 On page 6.2-1, the introduction to existing conditions should add that visual assets in the NPCPU include the numerous residential and commercial buildings of historic age that still reflect attractive and authentic architecture of their origins, particularly during the heyday of Craftsman and Revival architectural styles, and a small village scale of the period from 1900 to 1940.

B3-49 On Figure 6.2-1 *Public Views-North Park*, two open space/parks areas are identified without accompanying viewsheds. These are the existing North Park Community Park between Oregon and Idaho streets south of El Cajon Boulevard, and the planned but not yet constructed park at North Park Way and Granada Avenue behind the North Park Theatre. Viewsheds should be

B3-43 Table 6.1-2 has been revised to include zone RM-3-7.

B3-44 Language has been added to Section 6.1.13 of the Final PEIR to specify that the CPU furthers environmental justice in the North Park community "by providing additional housing stock and a diversity of housing types to serve the needs of the community." See also response to comments B3-5 and B-39 regarding the proposed North Park CPU's consistency with environmental justice goals.

MR-2500 does not belong in Table 6.1-3; clarification that Table 6.1-3 contains only the zones found in North Park has been added.

RM-2-7 is not depicted in Figure 3-6 because it is not a proposed zone in the North Park CPU.

RM-3-7 has been added to Table 6.1-4.

B3-45 A footnote regarding the Pedestrian-Oriented Infill Development Enhancement Program has been included on Table 6.1-4.

B3-46 See Section 3.5.9, Improved Transportation Network and Increased Alternative Modes of Transportation, of the PEIR for a discussion on how the proposed CPUs would promote alternative modes of transportation.

B3-47 The City does not agree that the proposed North Park CPU is inconsistent with the General Plan and San Diego Forward – the Regional Plan. Rather, as discussed in Section 6.1, the proposed North Park CPU was found to be consistent with the General Plan and San Diego Forward – the Regional Plan.

B3-48 The existing conditions Section 6.2.1.2 Traditional Character Areas discusses areas identified by the proposed North Park CPU as having historic architectural styles. Issue 2 Neighborhood Character of Section 6.2.3, Impact Analysis, also analyzes historical assets with respect to neighborhood character. For further discussion and analysis on historic architectural styles within the proposed North Park CPU area, see Section 6.7 Historical Resources of the PEIR.

B3-49 This comment does not address the adequacy of the Draft PEIR; however the following information is provided for informational purposes. Generally,

identified for these areas, and a specific plan-to-ground analysis of how planned zoning and building heights would affect views from these public areas should be provided.

B3-50 On Figure 6.2-2 *Centers, Corridors, and Neighborhoods - North Park*, the University Heights Water Storage and Pumping Station Historic District between Oregon and Idaho streets south of El Cajon Boulevard should be added. This historic district, which encompasses the Water Tower and North Park Community Park (once the site of a 17.5-million gallon partially buried reservoir) was established April 23, 2015.

B3-51 On Figure 6.2-2, many areas are misidentified as "Multi-Character Neighborhoods," which the text on page 6.2-4 describes as places where "North Park's original character is no longer dominant." The determination of a street/area being Traditional or Multi-Character should be based upon whether the greatest number of buildings in the street/area are consistent in age and style of the particular period or not. If the street/area has a clear majority of such a consistency, the neighborhood should be considered Traditional and not Multi-Character. For example, NPHS finds that streets identified on Figure 6.2-2 as Multi-Character Neighborhoods but should be identified as Traditional Neighborhoods include the following:

- *Both sides of Wightman from Arnold to 28th* (includes corner lots abutting Wightman)
  Total # of Properties = 27; # of Pre 1930s = 22; # of Pre 1950s = 4; # of 1970s Era = 1
  % of properties evaluated as contributing to the historical fabric of the street = 85%
- *28th from Landis thru Wightman* (includes corner lots abutting 28th)
  Total # of Properties = 14; # of Pre 1930s = 13; # of 1970s Era = 1
  % of properties evaluated as contributing to the historical fabric of the street = 86%
- *Both sides of Bancroft from Landis to North Park Way* (includes corner abutting Bancroft)
  Total # of Properties = 22; # of Pre 1940s = 17; # of Pre 1950s = 1; # of 1970s Era = 4
  % of properties evaluated as contributing to the historical fabric of the street = 68%
- *Both sides of Georgia from Lincoln to El Cajon Boulevard*
  Total # of Properties = 64; # of Pre 1960s = 48; # of apartments = 16
  % of properties evaluated as contributing to the historical fabric of the street = 75%
- *Both sides of Howard from Park to Texas*
  Total # of Properties = 38; # of Pre 1960s = 36; # of apartments = 2
  % of properties evaluated as contributing to the historical fabric of the street = 95%
- *Both sides of Polk from Park to Texas*
  Total # of Properties = 34; # of Pre 1960s = 34; # of apartments = 0
  % of properties evaluated as contributing to the historical fabric of the street = 100%
- *Both sides of Lincoln from Park to Texas*
  Total # of Properties = 25; # of Pre 1960s = 25; # of apartments = 0
  % of properties evaluated as contributing to the historical fabric of the street = 100%

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B3-49 (cont.)

a public viewshed is an unobstructed panoramic view from a public vantage point. As open space alone does not constitute a public viewshed and no public panoramic views are available in these areas, the two open space/parks identified in this comment were not assigned a viewshed. Policies for the preservation of open spaces are included in Section 4.3, Canyons and Open Space Preservation, and Section 8.3, Natural Resource Conservation, of the proposed North Park CPU's Urban Design Element address development along canyons and open space features.

B3-50 Figure 6.2-2, Centers, Corridors, and Neighborhoods – North Park, of the PEIR has been revised to include the University Height Water Storage and Pumping Station Historic District.

B3-51 The City does not agree that the noted Multi-Character Neighborhoods should be reassigned as Traditional Character neighborhoods. Multi-Character Neighborhoods are assigned to areas that have both traditional character and non-traditional character development, recognizing that traditional character remains but is interspersed with non-traditional character structures. The proposed North Park Community Plan's Urban Design Element provides details about the criteria used to define these neighborhoods and the urban design policies that apply within them.

In consideration of the above examples of errors, a detailed on-the-ground review of the NPCPU area should be conducted in order to correct Figure 6.2-2 to accurately reflect North Park's neighborhood character.

B3-52 On Figure 6.2-3 *Community Gateways - North Park* there is no explanation in the legend of the letters in circles.

B3-53 Section 6.2.3 *Impact Analysis, Issue 1 Scenic Vistas or Views*, should provide an analysis of potential impacts on public views adjacent to North Park Community Park (which is also a historic district) from zoning that would allow density of 73 du/ac and 60-foot high buildings.

B3-54 Section 6.2.3 *Impact Analysis, Issue 1 Scenic Vistas or Views*, should provide an analysis of potential impacts on public views adjacent to the planned park behind the North Park Theatre from zoning that would allow density of 109 du/ac and buildings of unlimited height.

B3-55 Section 6.2.3 *Impact Analysis, Issue 2 Neighborhood Character*, lacks a meaningful analysis of the impacts of zoning and the Pedestrian-Oriented Infill Development Enhancement Program on existing neighborhood character. These aspects of the NPCPU will indeed result in a "substantial alteration (e.g. bulk, scale, materials or style)" to the existing character of North Park, and the resulting significant impacts must be disclosed to decision makers and stakeholders. As examples, an analysis will reveal the following:

- On page 6.2-7, the PEIR offers as rationale for non-significance that "much of the CPU area is already developed, and any new development or redevelopment would occur on infill sites." While it is true that much of the CPU area is already developed, the residential buildings typically do not exceed two stories in height and many are of historic age, so they reflect consistent low-rise scale, are made of historic materials such as stucco and irreplaceable types of wood, and are built in Craftsman or Revival styles. New development on the very few vacant sites available (what it is assumed is meant by "infill") would likely not be consistent with the historic materials, style, low-rise scale and detail of neighboring structures. Redevelopment on occupied sites would create similar incompatibilities with the added impact of demolishing existing structures that do reflect the highly valued historic neighborhood character of North Park. This is a significant impact.

- On page 6.2-7, the PEIR states, "Future development within the CPU area would be required to comply with the city's General Plan..." However, the NPCPU policies related to the Pedestrian-Oriented Infill Development Enhancement Program are inconsistent with General Plan direction regarding Environmental Justice and violate Executive Order 12898 by encouraging the disproportionate displacement of vulnerable populations. Development under the Pedestrian-Oriented Infill Development Enhancement Program therefore would not comply with the City's General Plan. This is a significant impact.

- On page 6.2-7, the PEIR states that "The Urban Design Element of the proposed North Park CPU establishes an urban design framework intended to direct future development

B3-52 Explanation for the letters included on the map in Figure 6.2-3, Community Gateways – North Park, has been added to the text in Section 6.2 of the Final PEIR.

B3-53 See response to comment B3-49.

B3-54 See response to comment B3-49.

B3-55 The City agrees that the increase in density would result in an increase in height or bulk in some areas compared to existing development. However, the City does not agree that the resulting change in height and bulk in some of the proposed North Park CPU areas would result in significant and unavoidable impacts, as the NPHS asserts. As discussed in Section 6.2.3, Impact Analysis, Issue 2 Neighborhood Character, increases in height, bulk, and scale would not result in a significant impact to neighborhood character with implementation of proposed North Park CPU policies that would ensure compatibility of future development with the existing community character. For example, the proposed North Park Urban Design Element addresses development design areas including Centers, Corridors, and Neighborhoods and defines policies that would guide development in a way that would add diversity in the built form while respecting the existing neighborhood context. Development transition areas provide design guidelines to ensure development is compatible with adjacent lower scale buildings, by providing second-story stepbacks and other design elements to maximize compatibility in bulk and scale.

See response to comments B3-5 and B2-6 regarding compatibility of the Pedestrian-Oriented Infill Development Program with environmental justice goals and Executive Order 12898.

The City agrees that undesignated, potential historic districts are at risk; however, the proposed North Park CPU would identify potential historic districts and includes a policy to minimize potential impacts to potential historic districts. Section 6.7.4, Issue 1 of the Draft PEIR explains that in response to this policy, amendments to the Historical Resources Regulations are proposed as part of this project to provide supplemental development regulations to address how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts. Development that does not comply

in a manner that ensures that the physical attributes of the North Park community would be retained and enhanced by design that responds to the community's particular context: its physical setting, cultural and social amenities, and historical assets." However, structures built to the allowable density of 73 du/ac under the Pedestrian-Oriented Infill Development Enhancement Program in an area of historic-age single family homes and two-story apartment complexes would by definition result in a substantial change in bulk and scale to the existing character. This is a significant impact no amount of setbacks or design features can avoid.

- On page 6.2-8, principles of the Urban Design Framework include: "A respect and appreciation for the history and culture of the community as expressed in historic districts." Since most of the Greater North Park Community Planning Area was built out by the 1950s, its history and culture are reflected throughout the planning area, not just in the few designated and proposed historic districts. Limiting respect and appreciation to only historic districts creates the potential for substantial alterations in bulk, scale, materials or style to all other neighborhood areas. In addition, proposed historic districts are not protected. As an example, zoning within the proposed 30th Street/University Avenue Commercial Historic District (shown on Figure 1-3 and listed in Table 10-4 of the June 2016 NPCPU) would be up to 109 du/ac with buildings of unlimited height. This is a significant impact no amount of setbacks or design features can avoid.

B3-56 On page 6.2-10, the PEIR concludes that the "regulatory framework would ensure that future development within the CPU area is compatible with the surrounding environment and does not degrade the character or quality of the area." However, no analysis is provided to substantiate this conclusion. In fact, as illustrated by the examples above, the proposed zoning and programs of the NPCPU, notably the Pedestrian-Oriented Infill Development Enhancement Program, will create incompatible development that will certainly lead to degradation of the historic character and quality of North Park. Far from being "less than significant," the NPCPU will result in significant and unavoidable impacts to neighborhood character that must be disclosed to decision makers and stakeholders.

B3-57 Potential impacts to neighborhood character require analysis, disclosure, and mitigation. Correcting this deficiency in the PEIR will require the addition of "significant new information" under CEQA Guidelines Section 15088.5(a)(1). Adequate analysis will reveal that (1) new significant environmental impacts would result from the Project in areas where substantial increases in density resulting from changes in zoning and incentives (in particular within the Pedestrian-Oriented Infill Development Enhancement Program area) would lead to incompatible development that would degrade the character and quality of the area; (2) new mitigation measures would be needed; and (3) not providing this new information and recirculating the PEIR would deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project.

B3-55 (cont.)

with the regulations of the supplemental development regulations would be subject to a Neighborhood Development Permit with deviation findings and mitigation. The amendments to the Historical Resources Regulations would be adopted concurrent with the proposed North Park CPU. However, ultimately the Draft PEIR concludes that impacts to potential historic districts would be significant and unavoidable because at a program level of analysis the degree and specificity of impacts for individual projects cannot be known. Regarding height limits in the Pedestrian-Oriented Infill Development Program area, height is regulated through FAR. In this area, the maximum FAR is 2.0.

B3-56 The City does not agree that the North Park CPU will result in significant and unavoidable impacts to neighborhood character. A discussion of how the regulatory framework would ensure compatibility of future development with the surrounding community character is included in Section 6.2.3, Issue 3 of the PEIR, where the Urban Design Element policies are discussed. For example, policies specific to each design area (Centers, Corridors, and Neighborhoods) would ensure future development considers the individual character of each setting. In addition, policies also ensure compatible transitions between higher density and lower density areas (Development Transition Areas). As detailed in the PEIR, the policies included in the proposed North Park CPU would minimize any potential degradation of the neighborhood character, resulting in less than significant impacts.

B3-57 The City does not agree that the analysis included in Section 6.2, Visual Effects and Neighborhood Character, is deficient. See response to comments B3-55 and B3-56.

Section 6.3: Transportation and Circulation

B3-58 Section 6.3.5 *Mitigation Framework* on page 6.3-44 provides an incomplete and confusing explanation for why many mitigation measures were not recommended. This section of the PEIR should only list the recommended measures as "mitigation" and group the rejected measures, most of which would generate unacceptable secondary impacts, in a separate section before the recommended mitigation measures. An explanation of why each non-selected measure was rejected and a brief explanation of potential secondary impacts should be provided.

B3-59 Section 6.3.5 is also deficient because the Impact Fee Study that is referenced was not provided with the PEIR. Correcting this deficiency in Section 6.3 of the PEIR will require the addition of "significant new information" under CEQA Guidelines Section 15088.5(a)(4) because this portion of the PEIR that cites the Impact Fee Study without providing it is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

B3-60 **Section 6.5: Greenhouse Gas Emissions**

Section 6.5.3.1 *Issue 1 Greenhouse Gas Emissions* has text that is out of place and an erroneous conclusion of non-significance, as discussed below.

B3-61 The first two paragraphs on page 6.5-8 discuss consistency with the City's Climate Action Plan, and therefore should be moved to Section 6.5.3.2 *Issue 2 Conflicts with Plans or Policies.*

B3-62 The third paragraph on page 6.5-8 mentions a "reduction factor" for transit that was applied in the greenhouse gas (GHG) emissions analysis. The source of this factor and a brief explanation of its application should be disclosed.

B3-63 The last paragraph on page 6.5-8 and continuing to page 6.5-9 concludes that impacts associated with GHG emissions would be less than significant. This conclusion is not consistent with the threshold or the quantitative analysis. The threshold of significance on page 6.5-6 is: Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? The quantitative analysis presented in Table 6.5-3 on page 6.5-7 shows that total GHG emissions would be greater for the proposed NPCPU than under existing conditions and the currently adopted community plan. These increases in GHG emissions mainly come from energy use, area sources, solid waste disposal, and construction. Since the total GHG emissions with the project would be greater than under existing conditions or with the current community plan, the project clearly exceeds the threshold of significance and impacts should have been concluded to be significant.

B3-64 In Table 6.5-3, vehicle emissions are greater for the NPCPU than under the current community plan but are less than under existing conditions. This result should be explained further. If traffic volumes will increase in the future, as indicated by traffic analysis in Section 6.3 of the PEIR, how do GHG emissions from vehicles decrease? Does the decrease come from improvements in vehicles or fuels, or from a projected decrease in vehicle miles travelled, or from another source?

B3-58 Section 6.3.5 of the Draft PEIR identifies mitigation measures that could reduce significant transportation impacts. These measures are included to provide full disclosure to the public and decision makers about the measures that could reduce significant impacts, if adopted by decision makers. The introductory language to each of the mitigation sections (6.3.5.1 and 6.3.5.2) identifies the measures that are proposed for implementation and describes that the other measures are not recommended. All of these measures were kept in the Final PEIR and specific discussion of infeasibility was not included as part of the Draft PEIR because findings of infeasibility are drafted as part of the final documents to be considered by the decision maker.

B3-59 See response to comments B3-30 and B3-31 regarding the Impact Fee Study.

B3-60 See response to comments B3-61 through B3-65.

B3-61 The discussion on consistency with the City's Climate Action Plan is applicable to Issue 1 Greenhouse Gas Emissions because the Climate Action Plan is the significance determination threshold. As stated in Section 6.5.2, Significance Determination Thresholds, of the Draft PEIR:

If emissions from build-out of the proposed North Park CPU and associated discretionary actions are less than those that would be generated by build-out of the adopted Community Plan, impacts related to GHG emissions would be less than significant provided the proposed North Park CPU and associated discretionary actions implement the land use-related strategies identified in the Climate Action Plan (CAP). If emissions from build-out of the proposed North Park CPU and associated discretionary actions are greater than those of the adopted Community Plan, impacts related to GHG emissions could still be less than significant if the increase in GHG emissions is a direct result of implementing CAP strategies and the General Plan's City of Villages Strategy.

B3-62 The source of the greenhouse gas reduction factor for transit is Appendix E-1, Greenhouse Gas Analysis for the Uptown, North Park, and Golden Hill Community Plan. Specifically, refer to Attachment 4, GHG Emissions Reduction Calculations, of Appendix E-1.

B3-63 Though total greenhouse gas emissions resulting from the proposed North Park CPU and associated discretionary actions would be greater than those resulting from the adopted North Park Community Plan, implementation of the CPU would be consistent with the City's CAP because it would implement CAP strategies and the General Plan City of Villages Strategy. See Section 6.5.2, Significance Determination Thresholds, for an explanation on the significance thresholds used for the analysis in Issue 1, Greenhouse Gas Emissions and reiterated above in response to comment B3-61.

B3-64 As discussed in Section 6.5.1.1.b of the Draft PEIR, greenhouse gas emissions estimates account for reductions due to statewide regulations on auto and fuel manufacturers that would lower vehicle emissions, as well as regional transportation-related targets that are implemented through future land use patterns, community design, and improvements in public transportation that reduce vehicle miles traveled.

B3-65 In addition, the location of these significant GHG impacts and the potential for vulnerable populations to be disproportionately affected should be discussed. On page 6.5-6, the PEIR states, "Concentrating new growth in an area can result in greater GHG emissions than allowing less intensive land uses to remain. Thus, consistency with the City of Villages Strategy can result in specific areas having an increase in GHG emissions, while Citywide a decrease of GHG emissions may occur." The NPCPU zoning and programs causing significantly increased GHG emissions therefore may be in direct conflict with General Plan direction regarding Environmental Justice and may violate Executive Order 12898. For example, if the increased GHG emissions would predominately occur in Census Tract 13.00, which has much higher percentages of minorities and low-income residents than in the County as a whole, and Census Tract 9.00, which has a much higher percentage of low-income residents, vulnerable populations may be disproportionately affected. These two Census Tracts encompass most of the Pedestrian-Oriented Infill Development Enhancement Program area. If this is the area with the greatest amount of "Area Sources," then this aspect of the NPCPU will create the potential for disproportionate impacts to vulnerable populations and therefore is not consistent with the U.S. EPA definition of Environmental Justice as fair treatment and meaningful involvement of all peoples, regardless of race, color, national origin, or income. This issue should be thoroughly and quantitatively analyzed in the PEIR.

Section 6.6: Noise

B3-66 On Figure 6.6-3 *Future (2035) Traffic Noise Contours – North Park* on page 6.6-13, the asterisks in the legend for three land use designations are not defined.

B3-67 On page 6.6-23, the PEIR concludes construction noise "would remain significant and unavoidable (Impact 6.6-4)." However, on page 6.6-26, the PEIR concludes that Impact 6.6-4 "would be less than significant" with implementation of controls outlined in noise mitigation measure NOISE 6.6-1. This inconsistency in conclusions should be corrected.

B3-68 On page 6.6-23, the PEIR concludes construction vibration "would be potentially significant (Impact 6.6-5)." However, on page 6.6-26, the PEIR concludes that "even with the implementation of NOISE 6.6-2, construction related vibration impacts would be significant and unavoidable." This inconsistency in conclusions should be corrected.

Section 6.7: Historical Resources

B3-69 Section 6.7.4 *Impact Analysis* of the PEIR lacks quantification and detail that should be provided under a plan-to-ground assessment. Examples of deficiencies that should be corrected in order for the PEIR to provide a good faith effort at full disclosure required by CEQA Guidelines Section 15151 are discussed below.

B3-70 The focus of the historic resources impacts analysis is on designated buildings and districts and on properties deemed eligible for individual listing. However, on page 6.7-10, the PEIR states, "The City of San Diego's CEQA Significance Determination Thresholds define a significant historic resource as one which qualifies for the California Register of Historical Resources or is

B3-65 The accumulation of greenhouse gas in the Earth's atmosphere creates an impact at the global level (e.g., potential to warm the global climate). While concentrating new growth in one area can generate greater greenhouse gas emissions compared to an area of the same size with lower intensity development, the impacts associated with those emissions occur at a global scale. Therefore, greenhouse gas emissions could not disproportionally impact any one neighborhood or local population. For a discussion on potential impacts to local air quality, see Section 6.4, Air Quality, of the Draft PEIR.

B3-66 Figure 6.6-3 has been updated to include footnotes defining the asterisks.

B3-67 The statement that Impact 6.6-4 would remain significant and unavoidable on page 6.6-22 was made in error and has been corrected. Table S-1, Summary of Significant Environmental Impacts and Section 6.6.7, Significance of Impacts After Mitigation correctly identify Impact 6.6-4 as less than significant with mitigation incorporated. Proposed mitigation measure NOISE 6.6-1, detailed in Section 6.6.6 Mitigation Framework, would reduce potential impacts to less than significant.

B3-68 Section 6.6.4, Impact Analysis, presents an analysis of whether the impact would be significant and Section 6.6.7 discusses the significance of the impact after mitigation. Impact 6.6-5 was determined to be potentially significant, and though mitigation measure NOISE 6.6-2 would reduce the impacts, it would remain significant and unavoidable. The discussion is not inconsistent.

B3-69 The City does not agree that the analysis presented in Section 6.7.4 of the Draft PEIR is inadequate. However, the City will consider all comments during the decision-making process.

B3-70 Resources not included in the state or local register, such as potential historic districts, were considered and appropriately analyzed in Section 6.7.4, Impact Analysis.

B3-71 listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code; though even a resource that is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA [emphasis added]. As an urban area that was largely built out by the 1950s, the Greater North Park Community Planning Area encompasses many buildings of historic age (45 years or older, which currently means built earlier than approximately 1970) that were not included in the impact analysis. Information on these resources must have been available to PEIR preparers because on page 6.7-5, the PEIR states, "The Historic Resources Survey completed for the North Park CPU and associated discretionary actions included a property-by-property inspection of the entire CPU area." Information on the numbers and general characteristics of all properties of historic age should be added to Section 6.7.1 *Existing Conditions*.

B3-72 The significance determination threshold for impacts related to historical resources is stated on page 6.7-8 as, "An alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object or site." Therefore, a plan-to-ground analysis should present quantitative information about the number of historic age structures potentially affected by policies, zoning, and programs proposed by the NPCPU. However, the impact analysis in Section 6.7.4 *Issue 1 Historic Structures, Objects, or Sites* is cursory and policy-focused, and does not quantify potential impacts from proposed zoning and the transit- and pedestrian-oriented density bonus programs on community resources of historic age. Examples of specific impacts that should be analyzed and disclosed are:

- Park Boulevard between El Cajon Boulevard and University Avenue has been designated as a "Transit-Oriented Development Enhancement Program Area" which would allow up to 145 du/ac proposals. The PEIR should analyze the impact that full build-out encouraged by this program would have on multiple unique historic resources, including Grace Lutheran Church, four bungalow courts built in the 1920s between Lincoln and Polk avenues, the Sprouts Farmers Market building near Howard Avenue, the Yoga/Pilates building at 4201 Park Boulevard, and the centerpiece of the shopping center at Park and El Cajon boulevards, which was once a Piggly Wiggly grocery store.

- The area between Lincoln and Howard avenues on the south and north, and between Park Boulevard and Boundary Street on the west and east has proposed zoning for at least 30-44 du/ac, with much higher density of 73 du/ac encouraged within the Pedestrian-Oriented Infill Development Enhancement Program. The PEIR should analyze the impact that full build-out encouraged by this zoning and the density bonus program would have on multiple unique historic resources, including some of the oldest homes in Greater North Park, such as two Victorian cottages built circa 1905 on Howard Avenue east of Georgia Street, and ten Victorian/transitional/early Craftsman homes built before 1912 on Florida Street north of Polk Avenue. Impacts should also be quantified for the area between Lincoln Avenue and El Cajon Boulevard on the south and north, and between Park Boulevard and Texas Street on the west and east, which encompasses 50 homes more than 100 years old and 200+ homes more than 75 years old. In addition, impacts

B3-71 The information requested by this comment is available in Appendix G-2, North Park Community Plan Area Historic Resources Survey, which is incorporated in the Draft PEIR by reference.

B3-72 The City does not agree that each historic age structure in the North Park CPU area needs to be quantified in order to present an adequate program level analysis. The mitigation framework proposed in Section 6.7.6, Mitigation Measures, would minimize impacts to any unidentified potentially historic structure. For example, mitigation measure HIST 6.7-1 would require development projects that would directly or indirectly affect a building in excess of 45 years of age to evaluate historic architectural resources to determine significance prior to permit issuance by the City. If found to be historically significant and the development project cannot entirely avoid the resource, HIST 6.7-1 also specifies appropriate mitigation for impacts historic buildings or structures. In addition, future development projects would be subject to subsequent project-level environmental review, which would likely reduce potential impacts at the project level. Nonetheless, the Draft PEIR concluded a significant and unavoidable impact to historical resources including potential historical districts because even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at the program level analysis.

should be quantified for the "Huffman" style multi-family buildings that are the intended target of the Pedestrian-Oriented Infill Development Enhancement Program, because many of these are of historic age; impacts also should be quantified for bungalow courts, which typically consist of 6+ units and could fall under the targeted building type.

- University Avenue from 28th Street to 32nd Street and 30th Street from North Park Way to Lincoln Avenue has proposed zoning of 109 du/ac with buildings of unlimited height. The PEIR should analyze the impact that full build-out allowed by this zoning would have on the integrity and viability of the potential 30th Street/University Avenue Commercial Historic District identified by the City's historical resources consultant, as well as on multiple historic structures on University Avenue such as the North Park Theatre (designated historic resource), Granada Building, Newman/IOOF Building, Woolworth building (designated historic resource), Nordberg building, and J.C. Penney Department Store building.

B3-73 The conclusion on page 6.7-18 of the PEIR states that "it is impossible to ensure the successful preservation of all historic built environment resources within the North Park CPU area. Therefore, potential impacts to the potential historic districts are considered significant and unavoidable." This conclusion is a sad reflection on the poor level of effort of the NPCPU to protect North Park's greatest asset—its authentic historic resources and character—particularly when neighborhood conservation and preservation of existing single-family housing stock is identified as the most important issue in the current Community Plan.

Section 6.12: Public Services and Facilities

B3-74 Section 6.12 fails to present a plan-to-ground assessment of the impacts generated by the increased population in North Park encouraged by proposed zoning and enhanced development programs. Conclusions in each of the topics under *Issue 1 Public Facilities* lack connection to the threshold of significance question stated on page 6.12-4. Consequently, conclusions of less than significant impacts are unsupported by facts in the public record and may be wrong. For example, current and projected population numbers should be applied to estimate future police response times and fire/life safety response times, and compare those projections to response time goals to determine if the NPCPU would result in the need for new facilities, the construction of which could cause significant environmental impacts.

B3-75 The impact analysis in Section 6.12.3.a *Police Protection* on page 6.12-4 of the PEIR states, "The project includes a comprehensive update to the existing Impact Fee Study for North Park that will define applicable DIF fees for future development, including fees for police facilities funding." The impact analysis in Section 6.12.3.b *Parks and Recreation* on page 6.12-12 of the PEIR states, "The project includes a comprehensive update to the existing Impact Fee Study for North Park [that] would define applicable DIF fees for future development including fees for park funding." Also, the impact analysis in Section 6.12.c *Fire/Life Safety Protection* on page 6.12-12 states, "The project includes a comprehensive update to the existing Impact Fee Study for North Park that will define applicable DIF fees for future development, including funding for fire facilities." However, the Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review. Therefore, the

B3-73 See response to comment B3-72 regarding mitigation framework intended to avoid or minimize impacts to unidentified and unevaluated historic resources. In addition, the proposed North Park CPU includes policies that seek to preserve and enhance the historical character of the North Park community and facilitate identification, designation, and preservation of historically and culturally significant resources. As previously discussed, a significant and unavoidable impact to historic resources was found because even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at the program level analysis.

B3-74 The City's determination threshold for public services and facilities states that a significant impact would occur if the proposed North Park CPU would: "promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities…the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives." Simply promoting population growth does not result in a significant impact. Though emergency response times would continue to increase with build-out of the proposed North Park CPU (as would with build-out of the adopted Community Plan), ultimately resulting in the need for new or expanded services, individual projects would be subject to Development Impact Fees for public facilities financing. In addition, separate environmental review pursuant to CEQA would be required for construction of facilities, such as police facilities. As such, the analysis presented in Issue 1 Public Facilities of Section 6.12.3, Impact Analysis, appropriately analyzes the proposed North Park CPU's impact to public facilities.

B3-75 See response to comments B3-30 and B3-31 regarding the availability of the draft Impact Fee Study.

public has been deprived of a meaningful opportunity to comment on adverse environmental impacts that directly affect the quality of life in the North Park community. In addition, if the Impact Fee Study was not available to PEIR preparers, the conclusions of less than significant impacts for each of the issues in this section are not based on facts in the public record and are therefore inadequate and conclusory.

B3-76 The impact analysis in Section 6.12.3.b *Parks and Recreation* on page 6.12-12 of the PEIR concludes that the NPCPU would result in a less than significant impact, but this conclusion is in direct opposition to the analysis presented. North Park has a severe deficit in population-based parks which will be substantially worsened by the increased population encouraged by proposed zoning and enhanced development (density bonus) programs. On page 6.12-12, the PEIR acknowledges that the future park deficit is projected to be approximately 100 acres and that the DIF fees would not be adequate to address the extent of the parkland deficit. The PEIR should conclude that making up a deficit of approximately 100 acres through "policy support" provided in the NPCPU is not feasible, constructing parkland in an already constrained urban area is not possible without generating significant environmental impacts, and therefore, impacts to parks and recreation are significant and unavoidable.

Section 6.13: Public Utilities

B3-77 Section 6.13.3 *Issue 2b Sewer* on page 6.13-5 of the PEIR states, "The proposed North Park CPU is a program-level document and does not propose any specific development projects." However, this statement and the following cursory analysis is not consistent with the statement on page 1-5 of the PEIR, where impacts of the Project are declared to be "assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of each proposed CPU compared to existing ground conditions." A plan-to-ground analysis should be presented for the issue of sewer utilities in the PEIR, especially considering CEQA Guidelines Section 15378 identifies "enactment and amendment of zoning ordinances" as a Project under CEQA.

B3-78 Existing sizes and capacities of sewer pipelines throughout the NPCPU area are known. Future populations, housing units and densities resulting from build-out under the NPCPU also are known. A plan-to-ground assessment of the impacts generated by the increased population in North Park encouraged by proposed zoning and enhanced development programs is possible and should be provided. The assessment should determine if new/altered utilities would be needed and if such construction could cause significant environmental impacts. For example, the substantial potential increase in population and sewage flows within the Pedestrian-Oriented Infill Development Enhancement Program should be compared to existing capacities of the sewer system in this area to assess if new/upsized utilities would be needed.

COMMENTS ON CHAPTER 8: EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 8.3: Population and Housing

B3-79 The discussion provided in Section 8.3 *Population and Housing* on page 8-3 of the PEIR is misplaced, inadequate, and reaches the wrong conclusions.

B3-76 The analysis presented in the Draft PEIR is a program level analysis; thus, the use of policy framework to support a less than significant impact determination is appropriate.

B3-77 Note that a plan-to-ground analysis is not the same as a project-level analysis. A program level, plan-to-ground analysis is an assessment of potential impacts resulting from build-out of the proposed CPUs. The proposed CPUs provide comprehensive policy framework for how the community should grow and develop, and do not propose individual projects that will implement the proposed CPUs. Individual development projects implemented in accordance with the proposed CPUs would be subject to the project-level mitigation framework proposed in the PEIR and/or subsequent environmental review pursuant to CEQA. Refer to Section 1.3.2, PEIR Scope and Content, of the PEIR for a discussion on the scope of the PEIR for the proposed CPUs.

B3-78 See Section 6.13, Public Utilities, for an analysis of potential impacts to existing utilities, such as sewer systems. See also response to comment B3-77 regarding program level, plan-to-ground analysis. Future discretionary projects proposed in accordance with the proposed North Park CPU would be subject to project-specific review under CEQA, which would be the appropriate place to analyze whether new or altered utilities would be required at the project level.

B3-79 See response to comment B3-26 regarding potential impacts related to population and housing.

The discussion of Population and Housing in Chapter 8 is misplaced because, as detailed in the comments presented in this letter for Section 1.3.2 *PEIR Scope and Content - Population and Housing*, potentially significant impacts to population and housing could occur from implementation of the NPCPU policies and programs. Answers to the three questions under topic XIII in CEQA Appendix G: Environmental Checklist Form should have been yes, and Population and Housing should be analyzed in a specific section within Chapter 6.

B3-80

The discussion of Population and Housing in Chapter 8 is inadequate because specifically for question (a), the NPCPU would induce a 10 percent increase in population, which represents a substantial population change, so the project would induce substantial population growth in the area by proposing new residential development at much higher densities than under existing conditions and the existing Community Plan. For questions (b) and (c), the loss of existing single family housing represents substantial displacement of existing housing and people living in those residences, and the targeting of existing two-story apartment buildings to be demolished and replaced with dense development of 73 du/ac and higher within the Pedestrian-Oriented Infill Development Enhancement Program area represents substantial displacement of existing housing and people living in those buildings.

B3-81

The discussion of Population and Housing in Chapter 8 reaches the wrong conclusions because several statements in this section are contradicted by facts in the public record. Examples of wrong conclusions are the following:

- On page 8-3, the PEIR states, "The proposed CPUs would not displace people or existing housing," but as noted above and discussed in detail in this letter under comments for Section 1.3.2 *PEIR Scope and Content - Population and Housing*, this statement is wrong. Due to the broad range of scenarios that could result from the language encouraging replacement of existing lower density housing with higher density housing in the Pedestrian-Oriented Infill Development Enhancement Program area, all single-family homes and bungalow courts could be lost in addition to the two-story apartments that are the intended target of the program.

- On page 8-3, the PEIR states, "the number of residential units in the CPU areas would increase as a result of the proposed CPUs, accommodating population growth and any displacement, therefore no impact would occur for this issue area." This conclusion fails to account for the fact that the two Census Tracts encompassing most of the Pedestrian-Oriented Infill Development Enhancement Program area have much higher percentages of low-income residents than in the County as a whole. Therefore, the potential is high for these vulnerable populations to disproportionately experience the adverse impacts of displacement, including not being able to afford to move back into new housing within the community after being displaced.

For these reasons and all of the reasons discussed in this comment letter under comments for Section 1.3.2 *PEIR Scope and Content - Population and Housing*, a specific section on impacts to population and housing should have been included in the PEIR. Correcting this deficiency in the PEIR will require the addition of "significant new information" under CEQA Guidelines

B3-80 See response to comment B3-26 regarding potential impacts related to population and housing.

B3-81 The City does not agree that the conclusions reached in Chapter 8 of the PEIR regarding population and housing are incorrect. In response to the first bullet point in this comment, Pedestrian-Oriented Infill Development Enhancement Program is only available to applicants with existing development projects of 6 dwelling units or more in Multi-Family Residential areas designated as Medium high up to 44 dwelling units per acre. Therefore, the Pedestrian-Oriented Infill Development Enhancement Program does not have the potential to result in the loss of existing single-family homes and bungalow courts in the program area.

In response to the second bullet point of this comment, see response to comment B3-4 regarding the alleged displacement impacts.

Regarding the sufficiency of the population and housing impact determination, see response to comment B3-26.

Section 15088.5(a)(1). Adequate analysis will reveal that (1) new significant environmental impacts would result from the Project in areas where substantial increases in density resulting from changes in zoning and incentives (in particular within the Pedestrian-Oriented Infill Development Enhancement Program area) would lead to the displacement of substantial numbers of housing units and people, many of whom represent vulnerable populations; (2) new mitigation measures would be needed; and (3) not providing this new information and recirculating the PEIR would deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project.

COMMENTS ON CHAPTER 9: GROWTH INDUCEMENT

B3-82 On page 9-2, the PEIR states, "The proposed North Park and Golden Hill CPUs each include an IFS that would allow maintenance and improvements in infrastructure capacity and public services to coincide with future development." However, the Impact Fee Study was not included in the NPCPU and was not made available in any form when the PEIR was distributed for public review. Therefore, the public has been deprived of a meaningful opportunity to comment on whether or not improvements in infrastructure capacity and public services would be adequate to avoid adverse environmental impacts resulting from future growth occurring under the NPCPU.

B3-83 On page 9-2, the PEIR states, "The proposed North Park and Golden Hill CPUs would designate land uses to accommodate growth, though additional housing units would not be built without demand. Therefore the CPUs would accommodate, not induce, growth in the North Park and Golden Hill communities." This conclusion lacks quantified analysis. Table 3-12 on page 3-36 of the PEIR shows the current household population of the North Park CPU area to be 46,420. Table 11-3 on page 11-5 of the PEIR shows the estimated future population under the existing Community Plan to be 68,610, which is 48 percent higher than the current population. Table 11-4 on page 11-6 of the PEIR shows the estimated future population under the NPCPU to be 73,170, which is 58 percent higher than the current population. Thus, there is a 10 percent increase in future estimated population induced by the policies and programs in the NPCPU. This population change is substantial, and apparently the result of policies and programs of the NPCPU. Therefore, it is not clear how the conclusion can be made that the NPCPU is accommodating, not inducing growth.

B3-84 Also, although it may be true that additional housing units would not be built without demand, high-density development will not occur where zoning or other restrictions prohibit it. So the policies and programs of the NPCPU that would incentivize growth in particular areas should be discussed and their potential for inducing growth should be assessed.

COMMENTS ON CHAPTER 11: ALTERNATIVES - NORTH PARK

B3-85 Figure 11-2 *Lower-Density Alternative - North Park* on page 11-20 of the PEIR has an error in the legend. The asterisks and notes about residential density bonuses should be removed. According to the description of this alternative in Section 11.3.1 on page 11-18 of the PEIR, "Residential densities would be designated for 16-29 du/ac in the central residential area and 30-44 du/ac for properties abutting the commercial corridors. The other density reductions would occur with the removal of the discretionary process 4 PDP density increase tool proposed with

B3-82 See response to comments B3-30 and B3-31 regarding the availability of the draft Impact Fee Study.

B3-83 As stated on Page 3-3 of the Draft PEIR, the proposed CPUs provide detailed policy direction to implement the City's General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, the prioritization and provision of public facilities, community and site-specific urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the North Park and the Golden Hill communities. The proposed CPUs, as with any community plan, are intended to manage and accommodate projected growth for the CPU areas, and would not induce population growth. Regardless of the proposed North Park CPU, the SANDAG 2050 Regional Growth Forecast, projects the region's population will grow by nearly one million people by 2050.

B3-84 Comment noted. The proposed North Park CPU is intended to accommodate growth. The comment does not raise an issue with regard to the adequacy of the PEIR; thus, a more detailed response is not provided.

B3-85 The asterisks and corresponding notes included in the legend for Figure 11-2, Lower Density Alternative – North Park, were in error and have been removed.

the proposed North Park CPU. The Medium High Residential zone would not be allowed to increase from a maximum 44 du/ac to 73 du/ac, within commercial areas along Park Blvd from 73 du/ac to 145 du/ac, and El Cajon Blvd. from 109 du/ac to 145 du/ac."

B3-86 The impact analyses in Section 11.3.2.a *Land Use* and Section 11.3.2.b *Visual Effects and Neighborhood Character* conclude that impacts of the Lower-Density Alternative would be similar to the proposed North Park CPU. However, because the Lower-Density Alternative would not include the increased density development of the Community Plan Enhancement Program, overall impacts of the Lower-Density Alternative would be less than the proposed NPCPU for these two issues.

B3-87 Section 11.4 *Environmentally Superior Alternative for North Park CPU* on page 11-25 of the PEIR states, "The Lower-Density Alternative would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP." The validity of this statement should be documented using a quantitative analysis similar to the analysis in Section 6.5 *Greenhouse Gas Emissions.* Otherwise it is unsupported by facts in the public record.

CLOSING

B3-88 The North Park Historical Society is hopeful that these detailed comments on the PEIR will help improve the environmental document and assist City Council in making a "decision which intelligently takes account of environmental consequences," in accordance with the spirit and the letter of California environmental law. In view of the significant impacts not documented in the PEIR (in addition to multiple other deficiencies detailed in this comment letter), either the Pedestrian-Oriented Infill Development Enhancement Program should be eliminated from the NPCPU, or the Draft PEIR should be substantially revised to include all of the analyses discussed in the attached detailed comment letter and recirculated for another 45-day public review period.

Sincerely,

Stephen Hon

Stephen Hon, President
North Park Historical Society

c: North Park Planning Committee
Councilmember Todd Gloria
University Heights Historical Society
San Diego Housing Federation
Save Our Heritage Organisation
Chris Ward
Lara Gates, City of San Diego

B3-86 Though the Lower-Density Alternative removes the Community Plan Enhancement Program and would result in less overall development from the proposed North Park CPU, the alternative would still include some increases in density to maintain the objective of walkable and transit-oriented development and would include the same policies to address the transition between height, bulk, and scale. Impacts related to visual effects and neighborhood character would remain similar to that of the proposed North Park CPU.

B3-87 Potential impacts associated with alternatives are not required to be evaluated at the same level of detail as the proposed project. Section 15126.6 of the CEQA Guidelines states, "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

The City's CAP identifies bicycling, walking, transit, and land use strategies for reducing greenhouse gas. As stated in Section 11.3.2, the Lower-Density Alternative would decrease density in areas where residents would have convenient access to transit and commercial services, which would conflict with the implementation of CAP strategies that requires increasing density in transit priority areas.

B3-88 Comment noted. The City appreciates the NPHS's participation in the public review comment process and will consider all comments during the decision-making process.

LETTER

Letter B4



NORTH PARK PLANNING COMMITTEE

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July 29, 2016

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Subject: **Comment on the Draft Program Environmental Impact Report**
PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT NO. 380611 / SCH No 2013121076

Dear City Staff and Decision Makers:

B4-1 Members of the North Park Planning Committee (NPPC) have spent eight years working on the preparation of the NPCPU, either conducting or attending approximately 150 meetings, including on the North Park and Golden Hill Draft Program Environmental Impact Report (PEIR). We have conducted an extensive review of the PEIR and while we appreciate the work that went into to it, we unfortunately find it lacking for reasons to numerous to include in this cover letter. However we have included a sampling of the deficiencies, including but limited to items enumerated below:

B4-2 Data that was included in many parts of the PEIR are from prior drafts of the NPCPU and do not match the current draft NPCPU out for review.

B4-3 Because of these errors in the PEIR data, the actual proposed increases in densities outlined in the 2016 Draft NPCPU were not included. The NPPC finds the PEIR fails to address or analyze environmental impacts pursuant to CEQA Guidelines Section 15064.4(b) (1), which is the responsibility of the city to provide.

B4-4 The PEIR includes no quantitative data or analysis of how the density increase and the resulting increases in traffic and other impacts will affect greenhouse gases. It offers no mitigation to deal with the probable increase in GHG. The PEIR lists unfunded mitigation methods for traffic impacts. CEQA regulations require mitigation measures to be reasonable and part of a funded program. None of the proposed mitigation methods are funded or part of an existing funded program. Therefore, they are not adequate mitigation measures; even for an impact that requires overriding considerations, as this type of impact still requires an attempt at some form of real mitigation methods.

RESPONSE

B4-1 Comment noted. The City appreciates the North Park Planning Committee's (NPPC's) participation in the public review comment process. The comment letter will become public record as part of the Final PEIR and all comments will be considered during the decision-making process.

B4-2 While this comment suggests an inconsistency in data used in the Draft PEIR, it lacks specific examples or other information necessary for the City to provide a meaningful response. The City has verified that the latest North Park CPU was used in the analysis. Where older outdated references to the CPU were identified, they have been corrected.

B4-3 No errors in the data used to determine proposed densities have been identified. This comment states that the Draft PEIR failed to comply with CEQA Guidelines Section 15064.4(b)(1), which requires the analysis of impacts from greenhouse gas (GHG) emissions to consider the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting. The existing GHG emissions are set forth on Draft PEIR pages 6.5-7 and 7.5-6 through 7.5-7, and specifically in Tables 6.5-3 and 7.5-3. This information is also provided in Table 3 of the GHG Supplemental Report, which is included as Appendix E-2. For the Golden Hill CPU, Table 7.5-3 explicitly shows the decrease from the existing conditions and the proposed CPU (a total decrease of 9,423 MT CO_2E from existing conditions, which is specifically identified on Draft PEIR page 7.5-7). For the North Park CPU, Table 6.5-3 explicitly shows the increase from the existing conditions and the proposed CPU (a total increase of 4,065 MT CO_2E over existing conditions).

B4-4 As discussed in the Draft PEIR, the proposed North Park and Golden Hill CPUs and associated discretionary actions propose an increase in multi-family residences. However, vehicle miles traveled (VMT) generated from residents of multi-family residential developments would be less than typical single-family residences due to the reduced trip lengths. Although this reduction was counted for new development proposed under the proposed CPUs and associated discretionary actions, this would reduce overall mobile emissions by 4.4 percent in the North Park CPU area and 3.1 percent in the Golden Hill CPU area. This is supported by CAPCOA's Quantifying Greenhouse Gas Mitigation Measures measure LUT-4, Increase Destination Accessibility. Additionally, it is important to note that the GHG

B4-4 (cont.)

emission calculations were conservative and did not take into account any reductions in VMT that result from the transit-oriented land use pattern. For example, CAPCOA's Quantifying Greenhouse Gas Mitigation Measures identifies several features included in the proposed CPUs that would reduce VMT. CAPCOA measure LUT-1, Increase Density, is identified as a means to reduce VMT and the corresponding GHG emission by up to 30 percent. By including a wide variety of land uses in the 30th Street and University Avenue Village, the 30th Street and El Cajon Boulevard Village, and the 25th Street Neighborhood Village, the CPUs would achieve CAPCOA measure LUT-3, Increase Diversity of Urban and Suburban Developments (Mixed Use), which is considered capable of reducing VMT and the corresponding GHG emission between 9 to 30 percent because residents would be in the same area as retail and office buildings. The concentration of development around the 30th Street Transit Corridor would achieve CAPCOA measure LUT-5, Increase Transit Accessibility, which may result in up to a 24.6 percent reduction in VMT and corresponding GHG emissions. If the VMT reductions resulting from the inclusion of these factors into the proposed CPUs were taken into account in the impact analysis, the reduction in GHG emissions would have been even greater. The analysis presents a worst-case-scenario, which is appropriate for a program level CEQA analysis.

Mitigation would be required if GHG impacts were significant. Whether the GHG emissions associated with the CPUs are significant was determined by (1) whether the CPU emissions would exceed the emissions in the Adopted Community Plan, and if so, whether the increase in GHG emissions is a direct result of implementing CAP strategies and the General Plan's City of Villages Strategy, and (2) whether the CPU is consistent with applicable policies and plans, including the CAP.

As discussed in the Draft PEIR, for the Golden Hill CPU, Table 7.5-3 explicitly shows the decrease from the existing conditions and the proposed CPU as well as a decrease from the adopted Golden Hill Community Plan and the proposed CPU. As concluded in the Draft PEIR, since the Golden Hill CPU would result in a reduction of GHG emissions when compared with land uses currently approved and would be consistent with the CAP, GHG emission impacts would be less than significant. Additionally, the Draft EIR looked to see whether the proposed Golden Hill CPU

B4-4 (cont.)

would be consistent with the CAP and its strategies. The proposed Golden Hill CPU policies would further implement policies in the CAP and would be consistent with the CAP. Please see Draft PEIR pages 7.5-7 through 7.5-11 for additional discussion.

As discussed in the Draft PEIR, for the North Park CPU, Table 6.5-3 explicitly shows the increase from the existing conditions and the proposed CPU as well as an increase from the adopted North Park Community Plan and the proposed CPU. However, as discussed in the Draft PEIR, the majority of the new multi-family dwelling units are planned either within, or within a 0.5-mile radius of, a Community Village Center. By targeting new growth along transit corridors, within, or within a 0.5-mile radius of, a Community Village, the proposed North Park CPU would be consistent with the General Plan's City of Villages Strategy, and thus, with Action 3.1 of the CAP, which calls for implementation of the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas (TPAs) to increase use of transit. The increase in GHG is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be less than significant. Thus, the proposed change in land uses would not significantly alter the assumptions in the CAP. Additionally, the Draft PEIR looked to see whether the proposed North Park CPU would be consistent with the CAP and its strategies. The proposed North Park CPU policies would further implement policies in the CAP and would be consistent with the CAP. Please see Draft PEIR pages 6.5-7 through 6.5-13 for additional discussion and also response to comment letter B1.

Because GHG impacts associated with the CPUs would be less than significant, no mitigation is required.

Regarding the comment that the Draft PEIR lists unfunded mitigation methods for traffic impacts; the Draft PEIR provides the mitigation that would be necessary to reduce the significant impacts identified. As stated in the analysis, many of the measures would not comply with proposed CPU

B4-4 (cont.)

policies. Additionally, for those measures included in the IFS, funding would not be adequately timed to ensure the mitigation could be implemented prior to occurrence of the impact. The feasibility of implementing the identified measures are further discussed in the Candidate Findings included as attachments to the Staff Report.

B4-5 Several mitigation methods refer the reader to an unspecified and unattached Implementation Plan. CEQA Regulations require public access and ability to comment on all documents referenced in a CEQA mitigation measure. The Implantation Plan is not included for the public to review and therefore, does not meet the standards for public review. CEQA requires the reader an opportunity to review all studies and plans referenced in a mitigation measure. The inability for the public to analyze and comment on the so called Implementation Plan calls into question whether the public could fully analyze the EIR and its mitigation measures.

B4-6 Mitigation Measure HIST 6.7-21 merely re-states the current (and inadequate due to lack of enforcement and implementation) City Policy regarding application of the Secretary of the Interior Standards, and does not provide meaningful mitigation that will continue to protect North Park historic resources during implementation of the NPCPU. Citing a General Plan policy does not constitute a mitigation measure. Impacts to historic districts are not mitigated and the process for protecting them is still vague at best and no-existent at worse. However, there are still possible mitigation methods available for North Park.

B4-7 **When a PEIR includes the number of errors, lack of adequate documentation and general inadequacies as this one does, the analysis and conclusions cannot be trusted and provide limited and suspect guidance for future development.**

NPPC Board Members have expressed satisfied with the NPCPU, if not the PEIR, and would like to see the NPCPU move forward. However, they will only do so if there are significant and binding mitigations offered by the City and at the very least a timeline and commitment to provide the requested studies and analyses.

Please find attached the unanimously approved NPPC Comments of July 19, 2016 on the North Park and Golden Hill Community Plan Updates.

Sincerely

Vicki Granowitz

Vicki Granowitz Chair
North Park Planning Committee

cc: Councilmember Todd Gloria
Jeff Murphy, Director of Planning Department City of San Diego
Alyssa Mutto, Deputy Director of Planning Department City of San Diego
Nancy Bragado, Deputy Director of Planning Department City of San Diego
Tait Galloway, Manager Planning Department City of San Diego
Lara Gates, Senior Planner City of San Diego
Chris Ward

B4-5 Section 12, Implementation, of the proposed North Park CPU and Section 11, Implementation, of the proposed Golden Hill CPU provide the implementation plans for the proposed CPUs and, therefore, were available for public review.

B4-6 Mitigation measures HIST 6.7-1 and HIST 7.7-1 call for avoidance, which is preferred, or site-specific mitigation of historical resources impacts for any development implemented in accordance with the proposed CPUs. In addition, the proposed CPUs provide adequate flexibility and incentive for preservation of historic resources. Impacts to potential historic districts are addressed through the proposed inclusion of amendments to the Historical Resources Regulations that provide supplemental development regulations for potential contributing resources. Impacts to historical resources remain significant and unavoidable because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis. Thus, the significant and unavoidable impact to historic resources is not a result of lack of identified feasible mitigation.

B4-7 This comment suggests a general inadequacy with the PEIR which are laid out in more detail in the referenced comments that are attached. Those concerns are addressed in the responses that follow.

North Park Planning Committee - PEIR Comments
Project Name: North Park and Golden Hill Community Plan Updates
Project No. 380611 / SCH No 2013121076
pg. 1 of 18

The following constitutes the July 19, 2016 North Park Planning Committee's (NPPC) unanimously approved comments on the North Park Program Environmental Impact Report.

3.0 Project Description: Land Use Distribution at Build Out (page 3-36)

B4-8 **Issue:**
Table 3-12, (Residential Development Existing and at Proposed Community Plan Update (CPU) Build-out) is Unclear & confusing to the general community with regard to the difference between number of units proposed at Plan Build Out vs. Household Population proposed to be served at Plan Build Out..

Solution:
Table 3-12 should be re-formatted by changing the column heading to clarify that 73,170 represents proposed increase in Household Population for North Park and NOT number of proposed Residential Units.

Urban Design Comments

B4-9 The proposed North Park CPU is supposed to provide detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), **the local street and transit network**, the prioritization and provision of public facilities, community and site specific **urban design guidelines**, and recommendations to preserve and enhance natural open space and historic and cultural resources within North Park.

B4-10 The PEIR is supposed to include recommended **mitigation measures**, which—when implemented—**would lessen project impacts** and provide the City with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. The PEIR should further serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the CPU areas, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, **the City can approve the activity as being within the scope covered by this PEIR**, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR

B4-11 **PEIR Mitigation Monitoring and Reporting Programs (MMRP) assist future projects to building what Community Plan outlines under this EIR. The absence in**

B4-8 Clarification has been added to the text prior to Table 3-12 and the headers have been revised to make it clear the difference between number of units and household population.

B4-9 This comment does not suggest an inadequacy of the Draft PEIR; therefore, a detailed response is not required. The proposed North Park CPU provides detailed policy direction to implement the General Plan with respect to the topics included in this comment.

B4-10 This comment suggests that the Draft PEIR did not include mitigation measures to lessen project impacts and that the PEIR would not serve as the EIR for subsequent activities or implementing actions such as future development. However, the City does not agree. The Draft PEIR includes mitigation measures identified to reduce potential impacts resulting from the proposed CPUs, which have been compiled into Mitigation Monitoring and Reporting Programs (MMRPs) for each CPU. In some cases, potential impacts remain significant and unavoidable after mitigation because at this program level of analysis, it cannot be certain that mitigation would be successful at the project level or the nature and extent of identified mitigation measures are beyond control of the City. In addition, the PEIR is intended to serve as the appropriate CEQA document to approve future actions for development within the CPU areas, if they are consistent with the PEIR. If additional environmental analysis is required for future actions and new impacts or mitigation measures are identified, new environmental documentation (e.g., Mitigated Negative Declaration, Addendum, or EIR) tiered from the PEIR would be prepared pursuant to CEQA Guidelines, Sections 15152, 15153, and 15168.

B4-11 The MMRPs for the proposed CPUs, which include information on enforcement and funding, will be prepared and made available with the Final PEIR. Future development projects would be subject to the applicable mitigation measures included in the MMRP which would allow for a streamlined environmental review pursuant to CEQA.

this parent document of reliable mitigation analysis and enforceable measures, such as Complete Streets improvements impact on traffic Level of Service and Vehicle Miles Traveled impact on Greenhouse Gas emissions, equates to subsequent projects needing new analysis and studies.

B4-12 **The Draft North Park Community Plan's policies explicitly request Complete Streets and improvements to pedestrian, bicycle, and transit mobility facilities to be built in the public realm. In our Charter City, which does not require vertical conformance between its policies statements and implementing regulations, the city is legally held accountable for its public realm improvements responsibilities found in Mitigation Measures in the PEIR's MMRP.**

B4-13 **Verify that the analysis sufficiently addressed minor modifications, such as travel lane reductions, future bicycle track lanes, removal of on-street parking, and curb extensions for added pedestrian capacity, to ensure that no additional traffic impact studies are required for these public improvements independently or associated with private development applications.**

3.2 Relationship to the General Plan (page 3-2 – 180)

B4-14 The proposed CPUs would build upon the vision, goals, and strategies of the General Plan. ***The proposed CPUs are intended to further express General Plan policies through the provision of site-specific recommendations*** that implement Citywide goals and policies at the community plan level, address community needs, ***and guide zoning***. The General Plan and Community Plans work together to establish the policy framework for growth and development in the CPU areas. ***The Land Development Code within the Municipal Code implements the community plan policies and recommendations through zoning and development regulations***.

Provide analysis and determination on the ability of city-wide zoning to implement the location specific Community Plan policies as opposed to the former Mid-Cities Planned Development Ordinance zoning tool crafted specifically for the 1986 updates.

B4-15 CPU implementation requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; amendments to the LDC to remove North Park from the Mid-City Communities Planned District Ordinance (MCPDO); amendments to the Land Development Code (LDC) to rezone the area located in North Park Community Planning Areas from the Mid-City Communities Planned District to Citywide zoning; adoption of LDC amendments to allow for implementation of the community plan policies; amendments to the Neighborhood Development Permit (NDP) regulations to include Supplemental Design Regulations for Potential Historic Districts; and a comprehensive update to the existing Impact Fee

B4-12 The City agrees that the City is legally held accountable for adopted mitigation measures carried forward in the PEIR's MMRP.

B4-13 Sections 6.3 and 7.3 of the PEIR analyze the proposed CPU's potential impacts to transportation and circulation. Appendices B-1 and B-2, Traffic Impact Study and Traffic Update Letter, provides the background study pertaining to traffic-related impacts associated with the proposed CPUs. The analysis presented in the PEIR assumed build-out of the proposed CPUs and implementation of associated discretionary actions. At a program level of analysis, it is not possible to provide the project level review needed to address all future transportation improvements envisioned; however the PEIR would allow for a streamlined review of these future projects that are envisioned with the proposed CPUs.

B4-14 This comment requests an analysis and determination on the ability of citywide zoning to implement the proposed CPU policies. This is outside of the scope of the PEIR, which is required to analyze and disclose the physical changes in the environment that would result from adoption and implementation of the proposed CPUs and other associated actions, including anticipated impacts that could result during future construction and operation. However, a description of the regulatory amendments required to implement the proposed CPU policies is included in Section 3.4.2, Land Development Code Amendments, and Section 3.4.2, Zone Changes.

B4-15 This comment does not suggest an inadequacy of the Draft PEIR. The components of the proposed CPUs and associated discretionary actions are summarized in Table 3-1, Project Components, of the Draft PEIR.

Studies (IFS) (formerly known as Public Facilities Financing Plans) resulting in a new impact fee for each community.

3.4.1.3 Urban Design Element (pg 3-14, pg 192)

B4-16 The proposed North Park Urban Design Elements describe existing community character and identify and provide goals and policies related to urban form, including public spaces and village design, neighborhood and community gateways and linkages, building types and massing, streetscape and pedestrian orientation, public views, urban forestry, and other unique aspects of the communities. These elements present the proposed urban form of the plan areas and highlight opportunities for urban design in the community.

Urban Design Element is more than Visual Effects & Neighborhood Character.

Recommendation:

Update our citywide CEQA Thresholds to Include Measures for Mixed-Use, Walkable Vertical Mixed Use Private Buildings as outlined in the city's General Plan PEIR MMRP.

Consider utilizing the area identified as Traditional Character Neighborhood (pg. 81 CPU) as a mitigation measure for future Historic Preservation Districts. These areas are identified for their 'historic character' to be preserved in this plan. However we need to be mindful that "Community Character" is defined by more than just density, as some individuals and organizations seem to be trying to say.

3.4.3.1 Citywide Rezoning (3-20)

B4-17 Citywide zoning will be applied in all areas. Proposed densities will be consistent with existing zoning with the exception of Community Enhancement Areas in the North Park CPU area where increased density and modified development regulations would be allowed with processing of a PDP.

Recommendation:

Create a city-wide Mixed-Use CC Zone that better fits the need for vertical mixed-use development on El Cajon Boulevard

B4-16 This comment does not suggest a specific inadequacy of the Draft PEIR. Rather, it suggests a change to the City's CEQA Thresholds, which is outside of the scope of this PEIR. The comment also recommends using the Traditional Character Neighborhood as mitigation for future Historic Preservation Districts. Policies HP-2.1 and HP-2.2 of the proposed CPUs provide interim protection to potential historic districts until they can be brought forward for historic designation and calls for the City to survey and prepare historic nominations for identified potential historic districts. It is not clear from the comment how the Traditional Character Neighborhoods would mitigate for Historic Districts; thus, a more detailed response cannot be provided.

B4-17 This comment does not suggest an inadequacy in the Draft PEIR; rather, it suggests creating a new citywide zone for mixed-use development to address need for higher density mixed-use development on El Cajon Boulevard.

Table 6.1-1 Applicable CPU Policies Related to Land Use (pg. 6.1-8, pg. 287)

Urban Design Element

B4-18

Issue:
An outdated version of the Draft NPCPU was used by City Staff in the preparation of the PEIR leading to errors in the text. The following are the ones we caught however there are likely others we missed.

Solution:
Make the following corrections:

Public Realm

1. UE-2.2 Consider plazas, courtyards, pocket parks, and terraces with commercial and mixed-use buildings.

   [The correct UE-2.2 policy states: Accentuate key focal points and entrances, and corner of a development with art, signs, special lighting, and accent landscape] – Remove this Incorrect Reference

2. UE-2.5 Encourage the creation of public plazas at gateways, nodes, and street corners with transit stops to help activate street corners and provide a foreground to building entrances.

   [The correct UE-2.5 policy states: Provide continuous and consistently designed right-of-way improvements, so that a development project reads as one unified project. Crate a seamless connection of landscape improvements between proprieties and across the streets.] – Remove this Incorrect Reference

Core and Mixed-Use Corridors

B4-19

3. UE-1.8 Preserve and encourage the enhancement of the Adams Avenue "Antique Row" and commercial node.

   [The policy reference is now located at UD-3.33] – Remove this Incorrect Reference

Consistent Character Area

B4-20

4. UE-1.21 Preserve and retain the single-family character created by small lots along Mission Avenue. –

   This Policy does not Exist. Remove this Incorrect Reference.

B4-18 Table 6.1-1, Applicable CPU Policies Related to Land Use, has been updated to include the language carried forward for the proposed North Park CPU policies.

B4-19 Table 6.1-1 has been revised accordingly.

B4-20 Table 6.1-1 has been revised accordingly.

B4-21

Gateways and Nodes

5. UE-2.17 Preserve and encourage the continued enhancement of the Adams Avenue "Antique Row" and commercial node.

[The correct location of policy is UD-3.33] – Remove this Irrelevant Land Use Reference.

B4-22

Replace the above Incorrect Policy Reference sited above with these Recommendations:

1. **UD-2.1 Create publicly accessible plazas and paseos as part of new development.**

   (The intention is to enable these public space types to count towards our Park and Recreation Deficits outline in MMRPs as they are required on all new development)

2. **UD-2.13 Improve pedestrian environments in the community with wider sidewalks where needed, enhanced crosswalks and paving, and better access and connectivity, shaping-producing street trees, street furnishings, and amenities that support walking.**

3. **UD3.22 promote a strong pedestrian and bicycling orientation along ECB (a-c)**
   (Enable these on Pedestrian-Orientation policies in TOD Enhancement Program Streetscapes)

Chapter 13 – Mitigation Monitoring and Reporting Program (MMRP)

B4-23

13.1 Introduction

Section 15097 of the California Environmental Quality Act (CEQA) Guidelines requires that a Mitigation Monitoring and Reporting Program (MMRP) be adopted upon certification of an Environmental Impact Report (EIR) (including associated Findings), ***to ensure that the associated mitigation measures are implemented***.

Recommendations:

1. Inclusion of Complete Streets Mitigation
   i. With Pedestrian/Bicycle Plans w/Class I Bikeways
   ii. To Plan for Mixed-Use Walkable Urbanism
2. Need to implement mixed-use, walkable/bikable/transit urbanism on corridors
3. Currently the only mitigation offered is the formation of Historic Districts and 1 freeway interchange. This is unacceptable given the proposed density increases

B4-21 Table 6.1-1 has been revised accordingly.

B4-22 Table 6.1-1 has been revised to include Policies UD-2.1, UD-2.2, UD-2.5, UD-2.13, UD-3.1, UD-3.2, UD-3.3, UD-3.15, and UD-3.22.

B4-23 This comment recommends additional mitigation to be included in the final MMRPs for the proposed CPUs, including mitigation to implement complete streets concepts with pedestrian/bicycle plans and mixed-use. However, mitigation to incorporate these concepts into the planning process are not required, as the proposed CPUs already include complete streets concepts and provide for increased opportunity for pedestrian and bicycle-oriented transportation. See Section 3.4.1.2, Mobility Element, of the PEIR for a discussion on the multi-modal transportation network proposed in the CPU areas and Section 3.4.1.1d, Community Plan Enhancement Program (North Park), of the PEIR for a description of the programs intended to create more transit and pedestrian-friendly projects along major transportation corridors.

This comment also states that the only mitigation offered in the PEIR is related to the formation of historic districts. This is not correct; mitigation measures to reduce impacts to air quality, noise, and paleontological resources are also proposed in the PEIR.

Section 6.3.2, Significance Determination Thresholds, of the Draft PEIR describes the thresholds used to evaluate potential impacts to transportation and circulation in accordance with the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds. As discussed in the Draft PEIR, impacts to transportation and circulation would remain significant and unavoidable. Though improvements that would reduce vehicular impacts were identified, most measures were outside of the City's control or inconsistent with the proposed CPU, and therefore would not be enforceable or were not recommended.

for North Park as well as the increases in greenhouse gas levels over the life of the CP among other impacts.

4. Only used LOS to study traffic impact, not mobility impact.
5. City needs to ensure mobility mitigation based on LOS.

B4-24

Comments:

1. There is a conflict with studying and then dismissing mitigation measures that don't meet our goals.
2. The PEIR should have used VMT to study measures that meet our goals (VMT's intent) and be in conformance with our city's CAP.

3. The City response to the NPPC request to use VMT was, …"the State has not formalized their rules for VMT so they had no choice but to use LOS." The NPPC finds this specious for the following reasons.
   a. Other municipalities have been using VMT in the absence of approved state rules and guidelines.
   b. However the City is constantly updating their own rules, codes, and guidelines. To update rules for VMT would be no different than any other process currently conducted.
   c. Additionally the City Council recently approved a ban on plastic bags in spite of the fact the State rules on this issue have not been formalized.

B4-25

Section 6.3: Transportation and Circulation

Whereas the State of California Office of Planning and Research (OPR) released a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (the "Paper") on January 16, 2016 based on Senate Bill 743;

Whereas the OPR's suggested changes to move away from analyzing impacts and mitigation using Levels of Service (LOS) and instead adopting Vehicle Miles Traveled (VMT) will trigger an update to the state CEQA Guidelines and subsequent local CEQA Guidelines;

Whereas the Traffic Impact Study for the North Park Community Plan Update (NPCPU) analyzed impacts and mitigation using LOS instead of VMT;

Whereas the OPR's Paper lists potential measures to reduce VMT, most of which are already included in the North Park Community Plan Update (NPCPU) policies (shown in brackets), such as:

a. Improving or increasing access to transit *[ME-2.3, UD-2.12]*
b. Increase access to common goods and services, such as groceries, schools, and daycare *[ME-1.1, ME-1.5, ME-1.6]*
c. Incorporate affordable housing into the project *[LU-4.6 thru LU-4.11]*
d. Incorporate neighborhood electric vehicle network *[ME-5.18, SE-1.13]*
e.

B4-24 There is no conflict or inadequacy with identifying mitigation that would reduce a potentially significant impact and then providing findings for why that measure is infeasible to implement. CEQA Guidelines Section 15091(a)(3) allows for this. The City is in the process of considering how to integrate VMT into its transportation analyses. However, at this time a final methodology and approach has not been adopted by the City and is not part of the City's CEQA Thresholds. Thus, a VMT analysis was not provided.

B4-25 This comment is informational in nature and provides background on Senate Bill 743 and the Office of Planning and Research's (OPR's) Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (Paper). The City agrees that the proposed CPU policies include a number of measures that reduce VMT. The comment also states that unmitigated impacts resulting from the LOS analysis of Section 6.3 could be mitigated through other measures not involving road and intersection widening. However, as detailed in this comment, the proposed CPU goals and policies already include the measures identified by OPR to reduce VMT. Therefore, additional mitigation that could be carried forward through a VMT analysis is already accounted for in the proposed North Park CPU.

f. Orient the project toward transit, bicycle and pedestrian facilities *[ME-2.9, UD-3.18, UD-3.19]*
g. Improve pedestrian or bicycle networks, or transit service *[ME-1.8, ME-1.16]*
h. Provide traffic calming *[ME-1.12, ME-3.13]*
i. Provide bicycle parking *[ME-1.8, ME-2.3]*
j. Limit or eliminate parking supply *[ME-5.8, ME-5.19]*
k. Provide car-sharing, bike sharing, and ride-sharing programs *[ME-1.19, ME-5.17, SE-1.14, SE-1.27]*
l. Provide transit passes *[ME-2.12, SE-1.14]*

Whereas OPR's Paper lists examples of project alternatives that may reduce VMT, most of which are already included in the NPCPU policies (shown in brackets), such as:

a. Locate the project near transit *[LU-3.4, LU-4.5, LU Density Bonus Program]*
b. Increase project density *[LU-5.11, LU Density Bonus Program]*
c. Increase the mix of uses within the project, or within the project's surroundings *[LU-3.10, LU-5.12]*
d. Increase connectivity and/or intersection density on the project site *[ME-1.5, ME-3.17]*
e. Deploy management (e.g. pricing, vehicle occupancy requirements) on roadways or roadway lanes *[ME-2.1, ME-2.2]*

B4-26

Whereas the NPCPU goals and policies will not only reduce VMT, but will also implement alternatives that may reduce VMT;

Therefore, the un-mitigated impacts that resulted from using LOS methodology listed Section 6.3 (Transportation and Circulation) of the Draft PEIR could be mitigated through other measures that do not involve road and intersection widening to accommodate single occupancy vehicles.

Whereas, Environmental impacts under section **6.3 Transportation and Circulation** are deemed by the Draft PEIR to be cumulative, significant, and un-mitigable;

Whereas the City of San Diego completed traffic analysis for this Draft PEIR using LOS (Level of Service) methodology rather than the soon-to-be-implemented VMT (Vehicle Miles Travelled) methodology currently under review by the State of California Office of Planning and Research as more appropriate for such analyses,

Whereas, **Mitigation measures TRANS 6.3-1 thru 6.3-6, 6.3-8 thru 6.3-12, 6.3-14 thru 6.3-26 as identified in sections 6.3.5.1 & 6.3.5.2 under 6.3 Transportation and Circulation** are unreasonable, unfunded, infeasible, undesirable to the community, do not meet the clearly stated goals of the North Park Community Plan Update (NPCPU) and would, in many cases, engender significant and immitigable environmental impacts of their own to historical resources, sustainability, parking, pedestrian safety, etc.;

Reasoning: These mitigation measures are all contrary to goals and policies contained in the Mobility and Sustainability Elements of the NPCPU and are contrary to the City of San Diego's recently enacted Climate Action Plan

B4-26 This comment summarized impacts and mitigation discussed in Section 6.3, Transportation and Circulation. The City agrees that most of the transportation-related mitigation measures would be contrary to goals and policies of the North Park CPU. Only those measures included within the proposed Infrastructure Fee Study (IFS) would be recommended for implementation and would not conflict with North Park CPU goals and policies. The comment suggests incorporating a number of alternative measures, further discussed below.

LETTER

Therefore, the NPPC suggests inclusion in the Draft PEIR of the following reasonable & feasible mitigation measures which DO meet the stated goals of the Greater North Park Community Plan, which would NOT engender further significant and un-mitigable impacts to Transportation and Circulation, and which would constitute more reasonable mitigation under a VMT analysis:

Street and Traffic Signal Improvements

B4-27 **1) Implement enhanced updated signalization technology at all present and future signalized intersections within and directly adjacent to the Greater North Park Planning area failing to meet an LOS score of C or higher; so as to allow for time-of-day appropriate flexible signal timing and to implement more efficient circulation for all transportation modes.**

Reasoning: This would mitigate impacts to all modes of transportation from projected increases in motor vehicle traffic, meet the mobility and sustainability goals of the NPCPU and support the City of San Diego's recently enacted Climate Action Plan

B4-28 **2) Coordinate with CALTRANS & SANDAG to implement Improvements and enhancements to all freeway on-ramps/off-ramps serving the Greater North Park Planning area so as to reduce automobile "stacking" and facilitate smooth transitions for transit, while preserving pedestrian and bike safety in these areas with pedestrian activated crossing enhancements.**

Reasoning: This would mitigate impacts to motor vehicle and transit delays from projected increases in traffic, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego's recently enacted Climate Action Plan

B4-29 **3) Modify Mitigation TRANS 6.3-18, Madison Avenue from Texas Street to Ohio Street to remove dysfunctional median chokers at Madison Avenue and Utah Street and implement Road Diet with bike lanes similar to Segment of Madison Avenue between Texas Street and Park Boulevard.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU and supports the City of San Diego's recently enacted Climate Action Plan

B4-30 **4) Modify Mitigation TRANS 6.3-6 to implement the University Avenue Mobility Plan, including appropriate maintenance, tree planting and public art.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU and supports the City of San Diego's recently enacted Climate Action Plan

B4-31 **5) Increase North/South multimodal access-opportunities (e.g. bikeways, pedestrian elevators, skyways, more frequent MTS service with later hours from Mission Valley Trolley Stations) from Mission Valley to other adjacent planning areas (Uptown, Normal Heights, Kensington), thus reducing traffic pressure on Texas**

RESPONSE

B4-27 This comment suggests implementing enhanced updated signalization technology to mitigate impacts resulting from increases in motor vehicle traffic. However, a mitigation measure is not needed because the proposed North Park CPU includes policies that call for the utilization of Intelligent Transportation Systems strategies including traffic signal coordination (Policies ME-4.1 and ME-4.3). Therefore, mitigation requiring updated signalization technology would not further reduce impacts as it is already part of the proposed CPU.

B4-28 This comment suggests coordination with Caltrans and SANDAG to implement freeway ramp enhancements to mitigate impacts to motor vehicle and transit delays, meet the mobility and sustainability goals of the proposed North Park CPU, and support the City's Climate Action Plan. However, proposed North Park CPU Policy ME-3.5 encourages coordination with Caltrans and SANDAG to identify and implement needed freeway and interchange improvements at North Park Way. Therefore, coordination is included in the project that was analyzed in the PEIR.

B4-29 This comment suggests modifying mitigation measure TRANS 6.3-18 to remove dysfunctional median chokers along Madison Avenue at Utah Street and implement road diet with bike lanes. However, this comment does not identify how this recommendation would further reduce traffic impacts at this roadway segment. In addition, road diets or lane diets will be implemented where appropriate in accordance with proposed North Park CPU policy ME-3.1.

B4-30 This comment suggests modifying mitigation measure TRANS 6.3-6 to implement the University Avenue Mobility Plan. However, TRANS 6.3-6 will not be carried forward as mitigation in order to maintain consistency with the overall mobility vision and other policies of the North Park CPU. Policies ME-1.4, ME-1.5, and ME-1.14 encourage improvements along University Avenue to enhance vehicular, bicycle, and pedestrian mobility.

B4-31 This comment suggests adding a mitigation measure to increase multimodal opportunities from Mission Valley. The mobility goals and policies of the proposed North Park CPU Mobility Element already serve to increase multimodal access opportunities (e.g., pedestrian, bicycle, transit, and vehicular facilities) within North Park and to adjacent communities. Additionally, the City does not have jurisdiction over Metropolitan Transit System facilities. Therefore, incorporating this mitigation into the PEIR would not further reduce potential impacts.

Street (One of the two most impacted streets in North Park per the Draft PEIR traffic analysis).

Reasoning: Currently Texas Street is one of very few access points from Mission Valley up to the Mesa on the South side. This mitigation measure meets the mobility connectivity and sustainability goals of the NPCPU as well as those of the adjacent planning areas, supports the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability; thus reducing motor vehicle trips. This mitigation measure is feasible, and parts are already funded as part of SANDAG's 2050 Regional Transportation Plan. (Note: See SANDAG Bikeway Projects: http://www.keepsandiegomoving.com/RegionalBikeProjects/SR15.aspx

B4-32 **6) Increase I-805 Freeway access from the Civita development in Mission Valley by implementing a northern ingress/egress route to Civita from the I-805 freeway via Phyllis Place, so as to lessen traffic pressure on Texas Street & Qualcomm Way and provide more efficient emergency evacuation for that very large development.**

Reasoning: This mitigation measure has been studied and identified by the City of San Diego for inclusion in Mission Valley's IFS, meets the mobility and sustainability goals of the NPCPU and that of Mission Valley, and would reduce motor vehicle trips on Texas Street. Potential traffic from the Civita Development has already be identified as having significant impacts to North Park in the areas of traffic and circulation by that Development's own Draft PEIR, and creating multimodal bike and pedestrian access up Texas Street has already been accepted by North Park and the City as reasonable mitigation for those impacts.

Sidewalk, Pedestrian, and Bicycle Improvements;

B4-33 **7) Implement Bike and pedestrian safety improvements to all intersections within and directly adjacent to the Greater North Park Planning area failing to meet an LOS.**

B4-34 **8) score of C or higher, including bike-permeable curb extensions to reduce pedestrian exposure to increasing traffic and appropriately designed to accommodate future bike lane infrastructure in all 4 directions.**

Reasoning: This would mitigate impacts to pedestrian and bike safety from projected increases in traffic, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego's recently enacted Climate Action Plan. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

B4-35 **9) Improve sidewalk safety and enhance pedestrian environment in the Public Right-of-Way (PROW) by removing trip hazards, repaving where necessary, proper PROW maintenance, relocating or burying intruding utility appurtenances, planting trees and appropriately locating public art.**

Reasoning: Enhancing the pedestrian environment encourages walking and biking, thus reducing automotive trips, meeting the mobility and sustainability

B4-32 This comment suggests adding a mitigation measure to construct a new roadway connection from the Civita development to Phyllis Place to connect to the ingress/egress ramps at I-805. The proposed mitigation measure is in support of a Community Plan Amendment (CPA) to the Serra Mesa Community Plan which is currently under environmental review. However, the proposed CPA is in the Serra Mesa Community Plan and the Civita development project is located in the Mission Valley Planning Area neither are within the purview of the North Park CPU.

B4-33 This comment suggests adding a mitigation measure to implement bike and pedestrian safety improvements to intersections within and adjacent to the North Park CPU area with a failing level of service (LOS). A significant impact was not identified for bicycle and pedestrian facilities; therefore, mitigation is not required to reduce impacts. In addition, policies in the Mobility Element of the proposed North Park CPU call for enhancement of bicycle and pedestrian facilities and access throughout the CPU area.

B4-34 This comment suggests adding a mitigation measure to reduce pedestrian exposure to increased traffic. However, policies in the Mobility Element of the proposed North Park CPU call for pedestrian facilities to increase safety, such as Policy ME-2.3. The suggested mitigation is not required to further reduce impacts.

B4-35 This comment suggests adding a mitigation measure to improve sidewalk safety and enhance the pedestrian environment. However, as previously stated, policies included in the Mobility Element of the proposed North Park CPU call for pedestrian facilities to increase safety and access. Therefore, the suggested mitigation would not further reduce impacts.

goals of the NPCPU and supporting the City of San Diego's recently enacted Climate Action Plan

B4-36 **10) Pedestrian and bike mobility, safety and aesthetic environment enhancements to the following bridges: Adams Avenue over the I-805, Adams Avenue over Texas Street, Howard Ave over the I-805 (ref: SANDAG bike lane project), Fern Street Bridge on 30th Street over Switzer Canyon.**

Reasoning: These mitigation measures have been identified by NPPC for inclusion in the North Park IFS, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability, thus reducing motor vehicle trips. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

B4-37 **11) Implement multimodal traffic & circulation enhancements in the area of Upas and 30th Street, as identified by NPPC for inclusion in the North Park IFS.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the North Park IFS, meets the mobility and sustainability goals of the NPCPU and supports the City of San Diego's recently enacted Climate Action Plan

B4-38 **12) Modify Mitigation TRANS 6.3-19 to increase SANDAG & other funding for community requested multimodal improvements, art, landscaping, and maintenance along the 3 identified SANDAG East/West bike corridors.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU, and supports the City of San Diego's recently enacted Climate Action Plan. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

B4-39 **13) Modify Mitigation TRANS 6.3-4 to enhance all intersections along the 30th street corridor to be bike and pedestrian safe and friendly.**

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU, & supports the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability, thus reducing motor vehicle trips. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

B4-40 **14) The Transportation and Circulation Section the Draft PEIR (Section 6.3.6) only includes three (3) mitigation measures as feasible because they are included in the Impact Fee Study (IFS) and discards the rest of the mitigation measures**: *"It is not likely that mitigation measures not included in the IFS would be implemented based on the lack of a funding mechanism and in some cases due to inconsistency of the recommended measure within the mobility goals of the proposed North Park CPU."* In addition, those three (3) mitigation measures may not be implemented in time before the

B4-36 This comment suggests adding a mitigation measure to enhance pedestrian and bicycle mobility, safety, and aesthetics on several bridges. However, as previously stated, policies included in the Mobility Element of the proposed North Park CPU call for pedestrian facilities to increase safety and access. In addition, a significant impact associated with pedestrian and bicycle was not identified. Therefore, the suggested mitigation is not required.

B4-37 This comment suggests adding a mitigation measure to implement multimodal traffic and circulation enhancements in the area of Upas Street and 30th Street. However, policies included in the proposed North Park CPU call for street enhancements to improve multimodal circulation in these areas and throughout the North Park community. For example, see Policies ME-1.4, ME-1.5, ME-3.19, and NE-1.3 of the proposed North Park CPU regarding improvements along Upas Street and 20th Street. No additional mitigation is needed because the proposed North Park CPU supports implementation of multimodal traffic and circulation enhancements.

B4-38 This comment suggests modifying mitigation measure TRANS 6.3-19 to increase SANDAG and other funding for community requested improvements. However, TRANS 6.3-19 will not be carried forward as mitigation in order to maintain consistency with the overall mobility vision and other policies of the North Park CPU. Policies requiring coordination with SANDAG, as well as information regarding public improvement funding (see Section 12.3, Priority Public Improvements and Funding), is provided in the proposed North Park CPU.

B4-39 This comment suggests modifying mitigation measure TRANS 6.3-4 to enhance intersections along 30th Street corridor for bicycle and pedestrian safety. However, TRANS 6.3-4 was not carried forward as recommended mitigation in order to maintain consistency with the overall mobility vision and other policies of the North Park CPU. However, as previously stated, policies included in the Mobility Element of the proposed North Park CPU call for the enhancement of streetscapes for pedestrian and bicycle safety and access. In addition, a significant impact associated with pedestrian and bicycle facilities were not identified. Therefore, the suggested mitigation is not required.

B4-40 See response to comment B4-24 regarding the use of an LOS analysis pursuant to the City's CEQA Significance Determination Thresholds.

impact occurs: *"Full implementation of these measures cannot be guaranteed because the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring.*

Thus, impacts 6.3-7, 6.3-13, and 6.3-18 would remain significant and unavoidable." Therefore, the analysis using LOS not only was inconsistent with the goals and policies of the NPCPU, but also produced mitigation measures that could not be implemented before the impact occurs using the same analysis;

The NPPC therefore requests an analysis using VMT, with mitigation measures that are consistent with the goals and policies of the NPCPU.

B4-41 **15)** The NPCPU supports the implementation of Complete Streets as mandated by AB 1358. However the LOS analysis included in the PEIR only provides an analysis for single occupancy vehicles and circumvents other modes of transportation such as walking, bicycling, and riding mass transit. Therefore, both the analysis in the traffic study and the mitigation measures in the Draft PEIR do not support the policies of the NPCPU.

B4-42 **16)** The City should now prepare regulations relating to Vehicle Miles Travelled (VMT) to eliminate the Level-of-Service (LOS) standard of traffic engineering. The CA Office of Planning and Research (OPR) is currently preparing VMT regulations to comply with AB 743; however, there is no reason that the City could not promulgate its own, prior to the OPR 2018 deadline and be ahead of this curve. The City of San Francisco has already adopted its own VMT regulations and there is no reason San Diego could not follow suit. The VMT standard would end the business as usual LOS standard and offer opportunities for the City to implement creative planning within North Park.

B4-43 **17)** NPPC requests mitigation measures that are in full support of the policies that are contained in the NPCPU [such as ME Goal 6, ME- 3.2, SE-1.1, SE-1.27] and that will be consistent with the Climate Action Plan (CAP). Therefore the NPPC hereby requests Analysis under VMT possible recirculation of the Draft PEIR because the Draft PEIR could have included feasible mitigation measures considerably different from those previously analyzed; mitigation measures that would clearly lessen the environmental impacts of the project.

B4-44 **18)** Some of the policies listed in Table 6.1-1 (Applicable CPU Policies Related to Land Use) DO NOT match the policies listed in the June 2016 Draft of the NPCPU, specifically from "Parks and Open Space" onward for example, UE-2.17 in the Draft PEIR reads *"Preserve and encourage the continued enhancement of the Adams Avenue "Antique Row" and commercial node"* and UE-2.17 in the NPCPU reads *"Locate and design utilities outside of the sidewalks to maintain a clear path of travel"*. Therefore, due to the inconsistencies in the information provided during public review, correction of these substantive errors recirculation of the Draft PEIR might be warranted.

B4-41 Potential impacts related to pedestrian, bicycling, and transit facilities are analyzed through Issue 2 Alternative Transportation in Section 6.3, Transportation and Circulation, of the PEIR. Issue 2 discusses the proposed CPU's consistency with adopted policies, plans, or programs supporting alternative transportation. Because the proposed North Park CPU contains multiple policies supporting implementation of "complete streets" concepts for enhanced pedestrian and bicycle comfort, safety, and access, further analysis is not required.

B4-42 See response to comment B4-24 regarding the City's CEQA Determination Thresholds and use of LOS standards.

B4-43 This comment suggests that mitigation is required to fully support goals of the proposed CPU, such as those in the Mobility Element. The proposed North Park CPU policies fully support the goals included in the Mobility Element. Future development would be required to demonstrate consistency with applicable North Park CPU policies as part of a discretionary review process. Thus, additional mitigation to meet the CPU goals is not required.

B4-44 Inconsistencies in Table 6.1-1 has been corrected to be consistent with the proposed North Park CPU policies. Though some policies included in Table 6.1-1 were incorrect, the proposed North Park CPU containing the correct policies was made available with the Draft PEIR. Therefore, the corrections made to the Draft PEIR have not resulted in significant new information that would require recirculation of the PEIR pursuant to Section 15088.5 of the CEQA Guidelines.

B4-45 **19)** Mitigation Measure TRANS 6.3-6 should be re-worded to identify that the I-805 northbound on-ramp is located at the intersection of University Ave. & Wabash Ave. This is a factual description error.

B4-46 **20)** Mitigation Measure TRANS 6.3-21a should be re-worded to clarify that Texas St. is not an at-level intersection with Adams Ave. within the segment from Adams Ave. to El Cajon Blvd. This is a factual description error.

B4-47 **Section 6.5.5 Mitigation Framework - Impact Fee Study**

Issue:

An Impact Fee Study (IFS) is cited in Table 3.1 (Project Components), Section 6.3.5, Mitigation Framework, Mitigation Measures TRANS 6.3-7, 6.3-13, AND 6.3-18, however no such study has been released to date by the City for Public Review.

At the April 19, 2016 NPPC Board Meeting, the public was noticed that an overview of the Greater North Park IFS would occur. However no viable details were provided by City Staff. The presentation lacked any substantive information about how the report would be compiled, what was to be contained in the report, how projects would be prioritized, how the NPPC and the public could provide input, or when an IFS would be made available for public review, among other issues. Subsequent requests for release of the Impact Fee Study meet with silence on the part of the City.

On June 29, 2016 (less than one month before the comment period for the PEIR is to close) a two-page list of projects ("The List") was sent to Vicki Granowitz, Chair North Park Planning Committee, with a comment: "…to share the List with the NPPC Board…"

"The List was never made available for public for review, provides no substantive information, lacks prioritization, contains errors, and appears to be incomplete. It provided no information to assist the Board in evaluation of the Transportation & Circulation Mitigation Framework (pg 6.3.44) or any other element that would be expected to be contained in an IFS; including but not limited to Public Facilities, Parks and Recreation and Libraries.

More importantly, a "List" is not a "Study" ("The List" includes no analysis) and since the PEIR cited the "Impact Fee Study", such a study including accompanying analysis should have been made available to the NPPC and the public for review and analysis to coincide with our review of the PEIR.

Conclusion:

The NPPC finds this is a significant and unmitigable error.

B4-45 This comment suggests modifying mitigation measure TRANS 6.3-6 to identify the location of the on-ramp. However, the description of TRANS 6.3-6 is accurate as stated. Further, this measure was not carried forward in the Mitigation Monitoring and Reporting Program for the North Park CPU in order to maintain consistency with the overall mobility vision and other policies of the North Park CPU. In addition, the suggested clarification would not affect the intent of the measure.

B4-46 This comment suggests adding clarification to mitigation measure TRANS 6.3-21a. The following clarification was added to this measure: "From Adams Avenue to Mission Avenue, construction of a retaining wall would be required along the east side of Texas Street to attenuate noise. Additionally, widening the Adams Avenue Bridge under path would be required".

B4-47 The Draft North Park IFS for Fiscal Year 2017 is an implementing component of the proposed North Park CPU and all reflects information already disclosed to the public within the text of the CPU. The facilities within the IFS are those needed to implement CPU goals; thus, the document does not provide additional information beyond what is provided in the CPU. The IFS was made publicly available on the City's website via the North Park Community Plan Update webpage (https://www.sandiego.gov/planning/community/profiles/greaternorthpark/) and the Upcoming Public Facilities Financing Plans/Impact Fee Studies webpage (https://www.sandiego.gov/facilitiesfinancing/plans) on August 1, 2016. It was also presented to the North Park Planning group on August 16th. The proposed North Park IFS can be accessed through the following direct link: https://www.sandiego.gov/sites/default/files/fy_2017_north_park_ifs_-_08-09-2016_draft_2.pdf.

The purpose of the IFS is to provide a list of facilities that are needed to implement the goals of the community plan, and to develop applicable Development Impact Fees (DIFs) pursuant to the California Government Code through which new development will pay its proportional fair-share of the cost of those facilities based on a clear nexus. Facilities identified in the IFS are identified in the proposed CPU; thus the public was not deprived of an opportunity to comment on the project as a whole. The IFS functions as an implementation document of the City of San Diego's General Plan and the North Park Community Plan. The North Park IFS is listed as one of the project components because it is an implementing document for the

B4-47 (cont.)

proposed CPU since it would establish the DIFs that would be paid as future development occurs within the CPU area. However, specific projects listed within the IFS would require their own future environmental review prior to construction. The purpose of the PEIR was not to evaluate and disclose the impacts associated with constructing needed facilities described in the IFS. Rather, the PEIR discloses the impacts of build-out of the North Park CPU on the need for public facilities and relies on the DIFs outlined in the IFS as a framework for ensuring future development provides their fair share of funding to support future facility improvements. Therefore, recirculation of the PEIR is not required.

Correction:

This error should be corrected by immediately releasing the IFS and accompanying analysis, and either extending the public review period by 30 days or possibly recirculation of the PEIR.

B4-48

Section 6.7: Historic Preservation

Mitigation Measure HIST 6.7-21 merely re-states the current (and inadequate due to lack of enforcement and implementation) City Policy regarding application of the Secretary of the Interior Standards, and does not provide meaningful mitigation that will continue to protect North Park historic resources during implementation of the NPCPU. Citing a General Plan policy does not constitute a mitigation measure.

Mitigation Measure HIST 6.7-21 states that *"to further increase protection of potential resources – specifically potential historic districts – the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation"*.

1) Because the above cited Proposed Draft Historical Resources Regulations (PDHRR) being amended in the Land Development Code (LDC) have neither been finalized, received an appropriate public noticing or vetting, nor have they been analyzed in this PEIR as is required under CEQA.

2) These PDHRRs were presented for the first time to the public on July 19, 2016 (less than a week before the end of the public comment period for this PEIR), precluding the possibility of their analysis in this document, therefore rendering these proposed PDHRR no mitigation at all under CEQA.

3) The explanation given by City staff that "this PDHRR is no different from the original draft zoning ordinance proposal" is nonsensical, inaccurate, and specious. The NPPC and the North Park Community have consistently placed Historic Resources Protection at the level of very highest importance in their input to the City during this Community Plan Update process. The NPPC and the North Park community have worked hard and unceasingly for 8 years to assist City Staff to meet this most important CPU planning goal It is entirely unacceptable and un-analyzable under CEQA to have this last-minute change sprung on the community after the community has agreed to accept density increases in exchange for promised increased protections for North Park's unique historic resources including but not limited to the North Park Main Street commercial area, A Bungalow Court Multiple Listing District and implementation of community identified Historic Districts.

4) The content of the proposed amendment of the Historical Resources Regulations has not been finalized or received appropriate public noticing, is not analyzed in this PEIR, therefore cannot be cited as a mitigation.

B4-48 This comment suggests that mitigation measure HIST 6.7-1 simply restates current City policy which is not accurate. The measure includes the proposed supplemental development regulations for the preservation of potential historic districts. In addition, HIST 6.7-1 also calls for a historical resources evaluation prior to issuance of any development permit where a building in excess of 45 years old may be affected. The protection measures for potential historic districts were first introduced to the community via workshop and posted to the City's website in March 2016. In May 2016, the implementation mechanism for the protection measures was changed to amend the Historical Resources Regulations; however, the protection measures proposed remained the same. The proposed amendments to the City's Historical Resources Regulations were made publicly available on the City's North Park Community Plan Update webpage (https://www.sandiego.gov/sites/default/files/draft_potential_historic_district_regulations_05312016.pdf) on May 31, 2016.

Section 3.4.2.2, Amendment to the Historic Resources Regulations, of the PEIR provides a description of the amendments, which are a feature of the project. Amendments to the Land Development Code, such as the Historic Resources Regulation amendments, are discretionary actions associated with implementation of the proposed CPUs and were appropriately analyzed in the PEIR. The draft amendments to the City's Historical Resources Regulations would be adopted at the time of the proposed North Park CPU adoption. The discretionary action to approve code amendments was included in Chapter 3, Project Description, of the PEIR (see Table 3-1) and analyzed in the PEIR.

5) There was a lack of information readily available during the public review period and a total lack of analysis of feasible mitigation for impacts to Historic Resources.

B4-49

6) A substantial increase in the severity of an environmental impact such as reduction in historic resources will result unless mitigation measures are adopted that reduce the impact to a level of insignificance. Appropriate and Feasible mitigation measures meeting the goals of the CPU and considerably different from those previously analyzed would clearly lessen the environmental impacts of the project, and should be analyzed and considered.

B4-50

7) The potential Draft Regulation Amendments to the LDC regulations (143.0210) represents a mitigation strategy that is unanalyzed in this PEIR. The NPPC finds it to be is substantially deficient and fundamentally problematic. An implementation timeline was presented for the first time at the July 19,2016 NPPC meeting, it is inadequate and has not been committed to in any official City action. Additionally, funding is inadequate for the task. The NPPC finds these the proposals as presented do not adequately meet the Historic Preservation goals of the NPCPU; there is significant public concern that the PEIR and NPCPU do not provide adequate community-specific protections for historic resources.

B4-51

The NPPC requests inclusion for analysis in the Draft PEIR the following proportional, reasonable & feasible mitigation measures which DO meet the stated goals of the June 2016 Draft North Park Community Plan, and which would NOT engender further significant and un-mitigable impacts to historic resources:

1) Accelerate the implementation schedule for Historic Districts that are identified in Figures 10-3 and 10-4 of the NPCPU. Eight years is an unacceptably long period of time to create eleven (11) historic districts, six (6) of which fall in the "small" range

2) of 50 properties or less and three (3) in the "medium" range. Further, 8 years is an unacceptably long period for a newly updated community Plan to be entirely without community-specific Historic Resource protections;

B4-52

3) Increase funding for the Historic Districts that are listed in Figures 10-3 and 10-4 of the NPCPU;

B4-53

4) Amend the NPCPU to Exclude historic resources from development calculations for floor area ratio, to allow additional density when retaining a historic resource; This would meet the General Plan's goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.

B4-49 As discussed in Section 6.7, Historical Resources, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. The mitigation measures proposed are anticipated to reduce impacts to historic resources. However, even additional mitigation would not reduce the uncertainty in mitigating project-level impacts through a program level analysis.

B4-50 The amendments to the City's Land Development Code were described in Section 3.4.2, Land Development Code Amendments, of the PEIR and accordingly analyzed in the PEIR as discretionary actions associated with the proposed CPUs. As previously discussed, the amendments would be adopted at the time of the proposed North Park CPU adoption. The Historical Resources Regulation amendments are consistent with the mitigation framework included in the PEIR and historical resource protection policies of the proposed North Park CPU. Policies in the proposed North Park CPU intended to protect historic resources, including specific designated or potential historic districts, are appropriately specific to the North Park community and are fully enforceable by the City. Working with the Community Planning Groups, the City has prepared a draft proposed work program for intensively surveying and processing the potential historic districts, and will be seeking the resources necessary to implement the work program.

B4-51 This comment requests an expedited schedule for the review and designation of potential historic districts as designated Historic Districts, and states that "8 years is an unacceptably long period of time for a newly updated community Plan to be entirely without community-specific Historic Resource protections." Working with the Community Planning Groups, the City has prepared a draft proposed work program for intensively surveying and processing the potential historic districts, and will be seeking the resources necessary to implement the work program. The draft work program does envision the processing of North Park's 11 historic districts over the span of eight years. Based upon precedent, a shortened period of time is insufficient to appropriately survey and document all potential historic districts pursuant to the City's Historical Resource Designation Nomination process. However, in implementing and refining the work program, the City will look for any opportunity to increase efficiencies

B4-51 (cont.)
and productivity to reduce processing times. In this interim period between adoption of the Community Plan Update and processing of the potential historic districts, five of the potential historic districts identified in the Historic Resources Survey will be protected through the supplemental regulations. Additionally, the remaining six potential historic districts will receive some level of protection through the current review process for buildings 45 years old or older.

B4-52 Working with the Community Planning Groups, the City has prepared a draft proposed work program for intensively surveying and processing the potential historic districts, and will be seeking the resources necessary to implement the work program.

B4-53 This comment does not suggest an inadequacy in the Draft PEIR. Rather, it suggests a revision to the proposed North Park CPU to exclude historic resources from development floor area ratio calculations. Because new development is already required to comply with development regulations that preserve the character of historic resources, this suggested mitigation would not further protect historic resources.

B4-54 5) Exclude historic resources from parking calculations to provide a reduced requirement when retaining a historic building. This is particularly important in the preservation of bungalow courts; This would meet the General Plan's goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.

B4-55 6) Include city-wide transferable development rights (TDR), enabling property owners to buy/sell rights so growth will result in appropriate areas, near transit and amenities. This would meet the General Plan's goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.

B4-56 7) Remove the "1/3 option" in the proposed Land Development Code (LDC) & replace with protections consistent with the Secretary of Interior Standards for Historic Review for all community proposed Historic Districts, including Commercial districts and the proposed Multiple Listing Bungalow Court District. The proposed "1/3 option" is not only not analyzed in this document, it has no precedent or analysis Stat-wide; whereas the Secretary of the Interior Standards for Historic Review are well documented and analyzed under CEQA as providing mitigation protections, and provide a more consistent and well understood framework, thereby providing greater developer certainty.

B4-57 Further, he term "original footprint" with regard to the "1/3 Option" is not clearly defined and could lead to trivial disputes. Also, the 2/3 rule does not adequately protect corner properties and will facilitate obtrusive and odd-shaped rear additions, which will be detrimental to a potential district. This provision is confusing and likely difficult to implement, and it's potentially very negative impacts to Historic Resources are unanalyzed in this PEIR document.

Solution: Remove "original footprint" language. Include language stating that additional stories and structural changes shall comply with the Secretary of the Interior Standards. Small additions (less than 300 square feet) and façade changes shall be limited to side and rear facades, and be minimally visible from the public rights-of-way.

B4-58 8) In order to effectively protect potential districts from incompatible change, i.e. scale, bulk, rhythm, and materials, for parcels that do not include a historic resource, but are located within a potential district; comprehensive infill guidelines for these potential districts are needed. Infill guidelines are necessary to ensure the potential historic district remains intact until such time when the district is brought forward. Without

B4-54 This comment does not suggest an inadequacy in the PEIR; rather, it requests a revision to the proposed North Park CPU to provide reduced parking requirements for development retaining historic resources. Policies included under Section 3.5, Parking, of the proposed North Park CPU call for reduced residential parking incentives that would provide similar benefits to those suggested for development retaining historic resources. In addition, City-wide zoning provides for the processing of Planned Development Permits to deviate from development regulations such as parking requirements, when the requested deviation would result in a more desirable project.

B4-55 This comment does not suggest an inadequacy in the Draft PEIR; rather, it requests inclusion of transferable development rights to encourage growth within appropriate areas. The proposed CPUs focus higher-density development along major transit and pedestrian corridors and meet the goals of the City of Villages Strategy and Climate Action Plan. The requested revision would not serve to further these goals.

B4-56 The purpose and intent of the supplemental regulations is to provide adequate protection of potential historic districts, to preserve their overall integrity and eligibility for historic designation, without applying the same development standards and criteria applied to designated historic resources. The supplemental regulations would allow alterations to the rear third of a building, which would generally not be visible from the street and would serve to preserve the original façade of buildings. Therefore, the regulation would appropriately protect historic resources and maintain their consistency with the historic character of the community.

B4-57 The "original footprint" of a building refers to the outline of the total existing building area. This term is commonly used by the City and developers, and is not anticipated to result in dispute. Following public review and in response to public comments, the City has proposed changes to the supplemental regulations for potential historic districts to specifically address corner lots, and to define the term "original primary façade." These revisions are now available at https://www.sandiego.gov/sites/default/files/draft_potential_historic_district_regulations_05312016.pdf.

B4-58 The supplemental development regulations included in the proposed amendments to the Historic Resources Regulations pertain to modifications to contributing resources within potential historical districts. In addition, mitigation measure HIST 6.7-1 includes historic evaluation requirements for any development permit with the potential to affect a building or structure older than 45 years of age. The only properties not regulated by the Historical Resources Regulations would be those properties that are neither individually significant nor contributing resources to the potential historic district. However, proposed zoning throughout the CPU area, including in potential historic districts have been assigned with consideration to various factors including the potential historic value of a particular area. Infill guidelines applicable to non-contributing resources would not be needed because existing zoning and Land Development Code requirements would provide adequate regulations for bulk and scale appropriate to each specific Potential Historic District. Therefore, additional infill development guidelines are not needed, and mitigation for potential impacts to historical resources have been appropriately identified in the PEIR.

such guidelines and an analysis thereof, this PEIR fails to analyze potential mitigations to historic resources.

B4-59 **9)** Because no permit is currently required for so doing, the potential Draft Regulation Amendments to the LDC regulations (143.0210) do not adequately protect historic resources from the installation of replacement doors and windows when placed within the same opening, This lack is detrimental to any potential Historic district, could render the historic asset no longer contributing or eligible for a district, and therefore language should be developed and included in the CPU and LDC requiring such permits. Current City of San Diego General Plan and LDC provide no such protection, thus the PEIR's contention that these documents protect North Park is unsubstantiated.

Solution: All window and door replacements that fall within the proposed Land Development Code must require a building permit. Accordingly, add to Table 132-16B of Section 132.1602, for improvements consisting of replacement windows: (i) replacement windows that do comply with Section 132.1603 will require a

Construction Permit/Process One decision process, and (ii) replacement window that do not comply with Section 132.1603 will require a Neighborhood Development Permit/Process Two decision process.

B4-60 **10)** To effectively protect the potential district from inappropriate change, infill design guidelines should be created:

B4-61 **11)** Survey and implement the multiple listing for Bungalow Courts as a stand-alone district: Preservation of these historic affordable housing units meets the goals of the City's Climate Action plan, and their loss to infill development due to inadequate protection would constitute a significand and unavoidable impact under CEQA that an accelerated district implementation would prevent.

B4-62 **12)** Provide adequate enforceable protections for the potential historic districts. Due to inadequately funded and supported code enforcement, the City has not provided adequate code enforcement for Historic Resources in all areas of the City. City must provide a plan and funding for adequate code enforcement to ensure there is not a loss of historic fabric, rendering buildings no longer contributing to potential districts

Solution: Code Compliance issues within potential historic districts should be near the top of the priority list. In addition to higher monetary penalties, any features removed in violation shall be reconstructed. Residents of potential districts should be provided a direct number to contact officials when work occurs on weekends, evenings, and holidays to ensure against loss of historic fabric by illegal demolition.

B4-59 Existing regulations addressing officially designated historic properties require the review and approval of all modifications to the historic property, including windows and doors. This would not change with the proposed North Park CPU and associated discretionary actions. Additionally, existing building permit exemptions which apply to non-designated properties will also not change with this PEIR or the proposed supplemental regulations. The proposed supplemental development regulations were developed to allow contributing resources within potential historic districts to retain sufficient integrity to convey the significance of the district. Window replacements within the original openings, which are the only window modifications exempt from a permit, do not in and of themselves preclude a building from contributing to a historic district. Additionally, the proposed CPUs include policies to better inform and educate the public, including businesses, on the merits of historic preservation as well as to promote the maintenance and restoration of privately owned historical resources through incentive programs. In addition, it is unreasonable to impose a building permit for all window and door replacements within the community, as this comment suggests.

B4-60 Please see response to comment B4-58.

B4-61 Bungalow courts were identified by the Historic Resource Survey as a Multiple Property listing, not a historic district, as they lack sufficient geographic concentration to be eligible as a historic district. Improvements or modifications to bungalow courts that are designated as historic properties; designated as a contributing resource to a designated historic district; or identified as potentially individually significant would be subject to review for consistency with the US Secretary of the Interior's Standards in accordance with the Historical Resources Regulations. Additionally, bungalow courts which do not fall within the categories above but nonetheless contribute to a potential historic district would be subject to the proposed supplemental development regulations when located within potential historic districts. Therefore, these resources would be appropriately protected.

B4-62 The protections afforded to historical or potentially historical resources through the mitigation framework in the PEIR and supplement development regulations are fully enforceable as requirements of a development permit. The comment about City Code enforcement prioritizing potential historic district is noted and will be considered by decision makers. This comment also requests a direct number to contact officials when illegal demolition work is observed. Neighborhood Code Compliance contact information can be found at the following webpage: https://www.sandiego.gov/ced. Contact information for the Historic Resources division of the Planning Department can be found on the following webpage: https://www.sandiego.gov/planning/programs/historical.

B4-63 **13)** Offer rehabilitation loans and grants, including low- and moderate-income housing loans and grants, and commercial façade improvements grants for both documented and potential historic resources.

Section 6.4 Air Quality

B4-64 The air quality study showed a 3.6% to 4.8% increase in air pollutants, primarily as a result of increased traffic. Note, however, that the Greenhouse Gas Emissions study used a 3% reduction factor to account for the effects of the tire pressure program and Low Emission Vehicles, and this adjustment factor was not used in the air quality study. In addition, the air quality study simply took the difference between current land use and projected land use and multiplied it by the present-day average pollutants generated per land use unit. This analysis does not take into account the policies in the CPU designed to increase multimodal transportation and decrease Vehicle Miles Traveled, both of which effects would reduce the quantity of air pollutants generated.

Section 6.5: Greenhouse Gas Emissions

Issue

B4-65 The City's Climate Action Plan (CAP) is meant to play a significant role in reducing greenhouse gases (GHG). This is a significant endeavor and essential to the future of not just North Park but the City of San Diego.

6.5.5 Greenhouse Gas Mitigation Measures concludes that. "All impacts to GHG emissions would be less than significant. Thus no mitigation is required" pg 6.5.13

The NPPC finds this to be a significant error for the following reasons:

B4-66 The PEIR fails to address or analyze environmental impacts pursuant to CEQA Guidelines Section 15064.4(b) (1), which is the responsibility of the city to provide. The 2016 Draft North Park Community Plan along with the just adopted new city standards for the affordable housing bonus density program will lead to significant increased density at build out.

B4-67 The PEIR includes no quantitative data or analysis of how the density increase and the resulting increases in traffic and other impacts will affect greenhouse gases. It offers no mitigation to deal with the probable increase in GHG.

B4-68 Because of errors in the PEIR data, the actual proposed increases in densities outlined in the 2016 Draft NPCPU were not included, making the analysis even more questionable. Data that was included in many parts of the PEIR are from prior drafts on the NPCPU and do not match the current draft NPCPU out for review.

B4-63 This comment does not suggest an inadequacy of the Draft PEIR and does not warrant a detailed response.

B4-64 Air quality and greenhouse gas emissions impact analyses require different evaluations, which account for why a reduction factor would be used in one analysis and not the other. In addition, though the air quality analysis did not account for proposed CPU policies that would decrease vehicle miles traveled, this presents a conservative, worst-case scenario, which is appropriate for a program level CEQA analysis.

B4-65 Comment noted. This is an introductory comment to the following comment on the PEIR's greenhouse gas analysis.

B4-66 This comment makes reference to the same concern raised in comment B4-3. See response to comment B4-3.

B4-67 The GHG impact analysis provides a conservative quantitative evaluation of the proposed CPU. The PEIR then provides a qualitative analysis of how the proposed CPUs would target growth in TPAs. Though the GHG analysis did not account for proposed CPU policies that would decrease vehicle miles traveled, this presents a worst-case-scenario, which is appropriate for a program level CEQA analysis. It is concluded that implementation of the CPUs, in combination with implementation of the CAP overall and the CAP's annual monitoring and reporting, ensures achievement of the CAP's overall and Citywide emissions reductions, and nothing in the land uses proposed in the CPUs would be inconsistent with the promotion of effective land use to reduce VMT, or the ability to achieve the alternative mode shares assumed in the CAP. Also see response to comment B4-4.

B4-68 Though the GHG analysis did not account for proposed North Park CPU policies that would decrease vehicle miles traveled, this presents a worst-case-scenario, which is appropriate for a program level CEQA analysis. The comment also suggests that the data included in the analysis do not match the current draft North Park CPU. However, the analysis is based on the most current proposed North Park CPU.

B4-69 In addition, the Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan SCH #2014121002, April 26, 2016, pages E-8-9 includes quantitative modeling (proving that the City of San Diego has this capability), therefore the same standard of quantitative analysis needs to be provided for North Park. Failing to provide this analysis for North Park and Golden Hill does not meet the Goals of the City's Climate Action Plan, nor the Analysis Standards required under CEQA.

Conclusion:

B4-70 In the Coast Law Group's comments, on behalf of the CAP, to the City dated July 8, 2016 they conclude:

> "The current CPU EIRs fail to meet applicable CEQA mandates. The CPU EIRs must assess quantitative compliance with the Climate Action Plan, its reduction targets and goals. As drafted, the EIRs demonstrate a lack of compliance with Climate Action Plan goals because all four CPUs result in an increase in GHG emissions compared to baseline rather than a decrease of 15 percent by 2020, 40 percent by 2030, and 50 percent by 2035. Climate Action Campaign urges the City to conduct the requisite analysis and recirculate the EIRs for further public comment."
>
> The NPCPU is one of the four CPUs referenced in the Coast Law Group's letter. The NPPC agrees with this assessment & questions whether a recirculation might be necessary.

Solution:

B4-71 Consistent with the on-going request by the NPPC, the City should provide quantitative analysis of how the NPCPU meets the strategic targets for multi-modal transit and VMTs in the CAP.

Section 6.6 Noise

B4-72 Like the air quality study, the noise study showed significant effects largely due to increases in automobile traffic, and like that study, the methodology was to take the difference between current land use and projected land use and multiply it by the present-day average traffic noise generated. This analysis does not take into account the policies in the CPU designed to increase multimodal transportation and decrease Vehicle Miles Traveled and traffic speeds, all of which effects would reduce the volume of traffic noise generated.

B4-69 The comment recommends that a similar analysis be performed as the one performed for the Downtown San Diego Mobility Plan Final Supplemental Environmental Impact Report (SEIR) and references pages E8 and E9 of the Final SEIR for the Downtown San Diego Mobility Plan. This reference is to Topical Response #6: Overall Network Development and Traffic Operations, which includes a reference to the Mobility Study Technical Report. The hybrid model described in the Mobility Study Technical Report was a customized approach to the specific conditions in the Downtown area and is not applicable to analysis of transportation conditions the North Park CPU area.

B4-70 Please see response to the Coast Law Group's comment letter B1 written on behalf of the Climate Action Campaign.

B4-71 Please see response to comment B4-4.

B4-72 This comment makes reference to the methodology used in Section 6.6, Noise, of the Draft PEIR. The comment suggests that the methodology used in the analysis was to take the difference between current land use and projected land use and multiply it by the present-day average traffic noise generated. Rather, the analysis was based on future traffic projections provided in the traffic impact analysis. The Federal Highway Administration Traffic Noise Model algorithms were used to calculate distances to noise contours for each roadway. As with the air quality analysis, though the noise analysis did not account for proposed CPU policies that would decrease vehicle miles traveled, which would in turn reduce noise from automobile traffic, this presents a worst-case-scenario, which is appropriate for a program level CEQA analysis.

Misc. Comments

B4-73 1. **Correction**
Table 3-12 (Residential Development Existing and at Proposed CPU Build-out) should be re-formatted to clarify that 73,170 represents Residential Units and NOT Household Population.

2. **Impact Fee Study**

Issue:

B4-74 An Impact Fee Study (IFS) is cited in Section 6.3.5 Mitigation Framework, however no such study has been released to date by the City for Public Review.

At the April 19, 2016 NPPC Board Meeting, the public was noticed that an overview of the Greater North Park IFS would occur. However no viable details were provided by City Staff. The presentation lacked any substantive information about how the report would be compiled, what was to be contained in the report, how projects would be prioritized, how the NPPC could provide input or when it would be made available for public review among other issues. Subsequent requests for release of the study meet with silence on the part of the City.

On July 29, 2016 a two-page list of projects was sent to Vicki Granowitz, Chair North Park Planning Committee, with a comment: "…to share the List with the NPPC Board…"

The List was never made available for public for review, it seemed incomplete, provided no substantive information, lacked prioritization and contains errors. It provided no information to assist the Board in our evaluate of the Transportation & Circulation Mitigation Framework (pg 6.3.44) or any other element that would be expected to be contained in an IFS including but not limited to Public Facilities, Parks and Recreation and Libraries.

More importantly a "List" is not a "Study" and since the PEIR cited the "Impact Fee Study" it should have been made available to the NPPC and the public for review and analysis to coincide with our review of the PEIR.

Conclusion:

The NPPC finds this is a significant and unmitigable error.

Correction:

This error should be corrected by immediately releasing the IFS and either extending the public review period by 30 days or recirculation of the PEIR.

3. **Greenhouse Gas Emissions Section 6.5**

Issue: 6.5.5 Mitigation Measures

B4-75 The City's Climate Action Plan is meant to play a significant role in reducing greenhouse gases (GHG). This is a significant endeavor and essential to the future of not just North Park but to the City of San Diego.

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B4-73 Refer to response to comment B4-8.

B4-74 Refer to response to comment B4-47.

B4-75 Refer to response to comment B4-3, B4-4, B4-66, and B4-67. Also refer to response to the Coast Law Group's comment letter B1 written on behalf of the Climate Action Campaign.

6.5.5 Greenhouse Gas Mitigation Measures concludes that, "All impacts to GHG emissions would be less than significant. Thus no mitigation is required" pg 6.5.13

The NPPC finds this to be a significant error for the following reasons:

The PEIR fails to address or analyze environmental impacts pursuant to CEQA Guidelines Section 15064.4(b) (1), which is the responsibility of the city to provide. The 2016 Draft North Park Community Plan along with the just adopted new city standards for the affordable housing bonus density program will lead to increased density at build out.

The PEIR includes no quantitative data or anyasis of how the density increase and the resulting increases in traffic and other impacts will affect greenhouse gases. It offers no mitigation to deal with the probable increase in GHG.

Because of errors in the PEIR data, the actual proposed increases in densities outlined in the 2016 Draft NPCPU were not included, making the analysis even more questionable. Data that was included in many parts of the PEIR are from prior drafts on the NPCPU and were not matching the current draft NPCPU out for review.

In addition, the Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan SCH #2014121002. April 26, 2016, pages E-8-9 includes quantitative modeling, therefore the same standard of quantitative analysis needs to be provided for North Park.

Conclusion:

In the Coast Law Group's comments, on behalf of the Climate Action Campaign, to the City dated July 8, 2016 they conclude:

> "The current CPU EIRs fail to meet applicable CEQA mandates. The CPU EIRs must assess quantitative compliance with the Climate Action Plan, its reduction targets and goals. As drafted, the EIRs demonstrate a lack of compliance with Climate Action Plan goals because all four CPUs result in an increase in GHG emissions compared to baseline rather than a decrease of 15 percent by 2020, 40 percent by 2030, and 50 percent by 2035. Climate Action Campaign urges the City to conduct the requisite analysis and recirculate the EIRs for further public comment."

The NPCPU is one of the four CPUs referenced in the Coast Law Group's letter. The NPPC agrees with this assessment.

Correction:

The NPPC requests a recirculation of the PEIR to correct deficiencies related to an analysis of and mitigation related to GHG.

Letter B5

RINCON BAND OF LUISEÑO INDIANS
Environmental Department
1 W. Tribal Road · Valley Center, California 92082
(760) 297-2330 Fax:(760) 297-2339

June 9, 2016

Kurtis Steinert
The City of San Diego
Planning Department
1010 Second Avenue, MS 413
San Diego, CA 92101

Re: North Park and Golden Hill Community Plan Updates Plan NO. 380611

Dear Mr. Steinert:

B5-1 This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the North Park and Golden Hill Community Plan Updates Plan No. 380611 Project. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

B5-2 The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple
Manager
Rincon Cultural Resources Department

Bo Mazzetti, Tribal Chairman · Stephanie Spencer, Vice Chairwoman · Steve Stallings, Council Member · Laurie E. Gonzalez, Council Member · Alfonso Kolb, Council Member

B5-1 This is an introductory comment. The City appreciates the Rincon Band's participation in the public review comment process.

B5-2 The project areas are not within Luiseno Aboriginal Territory as stated. The City did distribute a Notice of the Draft PEIR to a number of interested tribes in addition to the Native American Heritage Commission (NAHC). The PEIR includes mitigation measures to require tribal involvement during future development to ensure inadvertent findings are handled according to the customs and traditions of the applicable tribe as requested by the commenter. Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2., in accordance with Assembly Bill 52.

Letter B6

San Diego Canyonlands

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

Marlon I. Pangilinan
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City of San Diego Planning Department
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Email: PlanningCEQA@sandiego.gov

July 21, 2016

Re: North Park Community Plan Update (June 2016), Focus on Switzer Canyon & Canyons in General

Dear Marlon,

B6-1 These comments, for the North Park Community Plan Update address proposed trails within Switzer Canyon specifically, and request some degree of flexibility for other potential trails or canyon enhancements that may not be currently addressed in this Community Plan Update and/or within any given community plan update.

B6-2 San Diego Canyonlands (SDCL) is a non-profit that works to foster education and ongoing community involvement in stewardship and advocacy in collaboration with other organizations.

Switzer Canyon

B6-3 I have reviewed the proposed trails at Switzer Canyon and they match a trail improvement plan that has been long sought by the community. Importantly, the trails will replace existing social patterns making access much safer and sustainable, reducing erosion and habitat fragmentation. I note that the trail coming down from Redwood and 31st St. will cross the ephemeral stream. Thank you for including a footbridge as part of the plan.

B6-4 Regarding the proposed trail that would come down the slope from the northeast corner of the 30th St. bridge in East Switzer Canyon, there is considerable erosion due to social trails on both the east facing and south facing slopes. Will this erosion be addressed as part of the trail improvement project?

A Process for Canyon Enhancement Planning (CEP)

B6-5 In 2009, SDCL began a successful Canyon Enhance Planning (CEP) program in four canyons in the community of City Heights. **The CEP Process** - First we map the existing conditions and then use those maps to facilitate community stakeholder meetings for each canyon. We conduct outreach to residents, resource agencies, schools, various city departments, and members of the community planning groups in an effort to assemble a robust and diverse group of stakeholders to join the process. The workshops result in action plans for each canyon including decisions on which trails should be closed or improved, or where new trails are needed. We look for potential links to major destinations including active parks, transit, schools, and other canyons. Plans also include priorities for habitat restoration, overlooks, viewpoints, and signage.

B6-6 Our Canyon Enhancement Planning Committee, along with staff from the City of San Diego Park & Recreation Department and its Open Space Division, have monthly meetings to review plans that are developed during the stakeholder process to insure plans are consistent with our General Plan, Community Plans and other land-use plans.

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B6-1 Comment noted. This is an introductory comment. The City appreciates the San Diego Canyonlands' (SDCL) participation in the public review comment process and acknowledges the request for flexibility for other potential trails or canyon enhancements not addressed in the North Park CPU.

B6-2 Comment noted.

B6-3 Comment noted. The City appreciates SDCL's support for the proposed trails at Switzer Canyon.

B6-4 Implementation of trails identified within the proposed North Park CPU would be evaluated at the project level as each trail improvement is proposed. Erosion would be considered as part of this project level review. In general, addressing erosion issues would be an important factor for future trail implementation. The North Park CPU includes policies to protect and enhance the natural resources of open space lands from erosion and other issues through re-vegetation efforts (see Policy RE-4.1). Additionally erosion control is required during the construction and development of trail improvement projects.

B6-5 Comment noted. The information provided about the SDCL's Canyon Enhancement Planning (CEP) program is acknowledged.

B6-6 Comment noted. The City appreciates the SDCL's participation as a stakeholder for trail planning.

LETTER

B6-7 **Since launching our CEP program in 2009 we have created action plans for seven canyons. Along with our partners, we have raised over $1,953,000 to implement these plans.**

B6-8 **Request for Flexibility Within the Community Plan Updates for Possible Future Canyon Enhancements**
SDCL is continuing the successful CEP program for canyons throughout the city. We received a grant last year from the California Coastal Conservancy to plan twelve more canyons in the City. We're asking for flexibility because it's possible that other trails or amenities may be desired by the various canyon communities in addition to those indicated within the updated community plan. For example, at Maple Canyon in Bankers Hill, we are in the middle of the CEP process and several trailheads are being discussed/considered in addition to those discussed in the update, while none are decided by the stakeholders.

B6-9 **We are requesting language and/or a process within the community plan that will allow for additional trails or other enhancements, without requiring a Community Plan Amendment, under the following conditions:**

1. The enhancement plans do not conflict with other Land Use Plans including the Community Plan;
2. The affected Planning Group approves the enhancements;
3. The project will be considered under a separate CEQA review process (if CEQA is required).

B6-10 Given 1, 2, and 3 above, and if approved by the City, trails and amenities such as benches, interpretive signs, protective fencing, native landscaping, trash and recycling containers, and overlooks, may be designed and installed where needed and appropriate for the trail type, without a Community Plan Amendment.

B6-11 Going forward, SDCL will prioritize our Canyon Enhancement Planning process in other canyons to coincide with the community plan update process as best we can. Still, when considering the dozens of canyons we have in communities throughout our city that are in need of enhancement, restoration, and improved access, requiring a Community Plan Amendment to approve these enhancements would be unnecessarily cumbersome. We hope you agree.

Thank you for your time considering these comments.

Sincerely,

Eric Bowlby

Eric Bowlby,
Executive Director
San Diego Canyonlands

RESPONSE

B6-7 Comment noted. The City appreciates the efforts and achievements of the referenced CEP program.

B6-8 Though this comment does not identify an inadequacy of the analysis presented in the PEIR, the City acknowledges SDCL's request for flexibility within community plan updates and a response is provided in the subsequent comments.

B6-9 The City appreciates the consideration given by SDCL to existing land use plans, planning group input, and CEQA review when required for the proposed development of trail facilities. Figure 7-1 in the proposed North Park CPU displays existing and proposed parks and recreation facilities, and open space including trails. Section 7.4 of the proposed North Park CPU states that "trail locations are approximate, and are provided to illustrate general trail alignments and connections to the community." Final alignments will be determined as specific trail improvement projects are implemented. The proposed North Park CPU does not preclude additional trails from being proposed and developed in the future. Trails may be proposed and implemented without an amendment to the community plan. However, any new or improved trail facilities that are intended to meet the park equivalency requirement would require an amendment to the community plan to record the park equivalency credit and to be included in the Impact Fee Study.

B6-10 Trails and park amenities such as benches, interpretive signs, fencing, etc. may also be proposed and installed without a requirement for a community plan amendment. Within the proposed North Park CPU, Table 7-1, Population-Based Parks and Recreation Facilities Inventory and Recommendations include flexibility for the trail improvements. As an example, trail improvements are listed as "such as interpretive signs, protective fencing, native landscaping, trash and recycling containers, overlooks, etc. where needed and appropriate for the trail type"

B6-11 The City agrees that future trail developments and improvements for passive recreation will not require a community plan amendment. New trails that would be considered a park equivalency and receive population-based park credit by the community would require a community plan amendment. These amendments could be processed at a later date in conjunction with other proposed amendments. It should also be noted that park and recreation facilities, including trail equivalencies, included in the proposed North Park CPU are identified in the Impact Fee Study and part of the Development Impact Fee for North Park.

Letter B7

San Diego County Archaeological Society, Inc.

Environmental Review Committee

14 July 2016

To: Mr. Kurtis Steinert
Planning Department
City of San Diego
Suite 1200, East Tower, MS413
1010 Second Avenue
San Diego, California 92101

Subject: Draft Program Environmental Impact Report
North Park and Golden Hill Community Plan Update
Project No. 380611

Dear Mr. Steinert:

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

B7-1 We have no comments on the contents of Appendix G. The detailed impact analysis and mitigation recommendations will be reviewed at the project level as the CEQA documents become available to us.

Thank you for the opportunity to offer our comments on this DPEIR

Sincerely,

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

cc: AECOM
SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

B7-1 This comment is noted. The City appreciates the San Diego County Archaeological Society's participation in the public review comment process.

Letter B8

Brandt-Hawley Law Group

Chanvet House • PO Box 1659
Glen Ellen, California 95442
707.938.3900 • fax 707.938.3200
preservationlawyers.com

July 28, 2016

Kurtis Steinert
Senior Environmental Planner
City of San Diego Planning Department
Via email: PlanningCEQA@sandiego.gov

PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT No. 380611

PROJECT NAME: Uptown Community Plan Update
PROJECT No. 21002568

Dear Mr. Steinert:

B8-1 On behalf of Save Our Heritage Organisation (SOHO), these comments address the draft environmental impact reports (EIRs) for the pending updates to the community plans for Golden Hill, North Park, and Uptown. SOHO's overarching concern is that the updates neither identify nor adequately analyze enforceable mitigation for significant impacts to historic resources.

Please respond to each of the following comments:

B8-2 1. CEQA requires that EIRs for projects or plans with potentially significant direct or indirect environmental impacts, including impacts on historic resources, identify and analyze feasible mitigation measures and a range of reasonable alternatives. SOHO contends that to prevent impacts to historic resources that may occur with development that will occur following the community plan updates, identified potential historic districts should be concurrently implemented for all three planning areas. Please revise the EIRs to provide for this feasible mitigation for plan impacts to historic resources or explain why not.

B8-1 Comment noted. The City appreciates the Save Our Heritage Organisation's (SOHO's) participation in the public review comment process. The comment letter will become public record as part of the Final PEIR. All comments will be considered during the decision-making process.

B8-2 The PEIR incorporates all feasible mitigation measures available to reduce the significance of potential impacts to historical resources. The project includes amendments to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified Potential Historic Districts until they can be intensively surveyed and brought forward for designation. Additionally, the proposed Historic Preservation Elements (HPE) for both North Park and Golden Hill include policies to intensively survey and prepare nominations for the Potential Historic Districts (Golden Hill and North Park HPE Policy HP-2.2). Nonetheless, the PEIR concludes that even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis.

B8-3 2. Please also revise the EIRs to identify and analyze the following mitigations to facilitate historic preservation and rehabilitation:

a. Exclude historic resources from calculations of floor area ratio, increasing density for projects that retain an historic resource;

b Exclude historic resources from parking calculations, allowing reduced parking when a project retains an historic resource;

c Include city-wide transferable development rights (TDRs), enabling property owners to buy and sell rights to encourage projects near transit and amenities.

B8-4 3. The EIRs state that plan impacts to historic resources are "significant and unavoidable." Supplemental development regulations proposed to mitigate impacts to potential historic districts require additional implementation measures to be ineffective:

a Will the EIRs be revised to impose timelines for implementation of the regulations, establishing priorities for potential historic districts? If not, why not?

B8-5 *b* Will the EIRs be revised to consider feasible funding for the regulations? If not, won't the mitigation be unenforceable?

B8-6 *c* Will the EIRs be revised to consider amendments to the supplemental development regulations so that they comprehensively apply to all resources within identified potential historic districts? If not, why not?

B8-7 *d* Will the EIRs be revised to apply regulatory protections to community-identified potential historic districts that the City agrees are eligible, the Multiple Property Listings (MPLs), and the commercial properties located within potential districts? If not, why not?

B8-3 Mitigation measures HIST 6.7-1 and HIST 7.7-1 call for avoidance, which is preferred, or site-specific mitigation of historic resources impacts for any development implemented in accordance with the proposed CPUs. The proposed CPUs provide adequate flexibility and incentive for preservation of historic resources. In addition, the Municipal Code currently provides incentive opportunities, including Conditional Use Permits to facilitate adaptive reuse and Planned Development Permits to allow for deviations from development standards to achieve a better project, such as one that preserves and incorporates a designated historic resource. Inclusion of the recommended measures is not needed to further reduce significant historical resources impacts. Even if those measures were added, the degree of future impacts and applicability, feasibility, and success of future mitigation measures would not be known for each specific future project at a program level of analysis and impacts would remain significant and unavoidable.

B8-4 The proposed supplemental development regulations are not proposed as a mitigation measure, rather they are part of the project. Implementation of the supplemental development regulations would occur concurrent with approval of the CPUs. Thus, the protections for Potential Historic Districts would be in place immediately with adoption of the CPUs and a timeline for implementation of the regulations is not needed. Significant and unavoidable impacts are identified even after implementation of the mitigation framework because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at a program level of analysis. Mitigation measures HIST 6.7-1 and HIST 7.7-1 and CPU policies protecting historic resources will be implemented to avoid or reduce impacts resulting from development to the greatest extent feasible. Policies included in the proposed CPUs would be implemented at the time of CPU adoption.

B8-5 As stated in response B8-4 above, the supplemental development regulations (amendments to the Historical Resources Regulations) will be implemented concurrent with the adoption of CPUs. Refer to Section 3.4.2.2 of the Final PEIR project description. Thus, the supplemental regulations would be enforceable as they would be part of the Historical Resources Regulation upon approval of the CPUs and would be implemented accordingly. Refer to Chapter 12 of the proposed North Park CPU and

B8-5 (cont.)

Chapter 11 of the proposed Golden Hill CPU for information on implementation and funding of the proposed policies. Policies may be implemented through existing infrastructure maintenance or funded from federal, state, and local grants or financing programs, from developers and property owners, and/or through updated impact fees.

B8-6 The Draft PEIR did consider the proposed supplemental development regulations in the analysis. The amendments to the Historical Resources Regulations are identified as part of the project in Chapter 3. Refer to Table 3-1 which identifies adoption of zoning amendments to the Historical Resources Regulations and amendments to the Neighborhood Development Permit regulations to address Potential Historic Districts as project components.

Applicability of the supplemental development regulations is detailed in the proposed code language (https://www.sandiego.gov/sites/default/files/draft_potential_historic_district_regulations_05312016.pdf) which specifies that the regulations would apply to single dwelling unit or multiple dwelling unit development on a premises within a potential historical district as specified in a land use plan when the premises has been identified as a potential contributing resource to the potential historical district. The regulations do not apply to all buildings within a Potential Historic District unless they are specifically identified as a contributing resource. The regulations would not apply to structures that are not identified as contributing resources to the Potential Historic District because non-contributing resources do not add any value to the Potential Historic District and their alteration would not further detract from the Potential Historic District.

B8-7 See response to comment B8-6 regarding applicability of the supplemental development regulations. As proposed, the PEIR identifies the community identified Potential Historic Districts in an effort to fully disclose the potential environmental impact. However, the supplemental development regulations will only apply to the Potential Historic Districts identified in the proposed CPUs. The decision makers will ultimately decide what Potential Historic Districts will be identified in the CPU. Multiple Property Listings are not Potential Historic Districts and are protected through current regulations requiring evaluation of resources 45 years old or older.

B8-8 *e* Will the EIRs be revised to consider alterations of the supplemental regulations to reasonably mitigate the loss of historic fabric for buildings that contribute to potential historic districts? Will the EIR consider mitigations that include training for the Historical Resources Board (HRB) and their staff for designation contributing buildings in their current conditions? If not, why not?

B8-9 *f* Will the EIRs be revised to consider requiring homeowners of historic properties to obtain permits for changes to windows and doors? The HRB staff consistently determines that historic resources are not eligible for designation when original windows and doors have been replaced. However, since the supplemental regulations do not require permits for changes to windows and doors that maintain the same size and location (the issue being a change in material), the HRB staff does not have a way to oversee this type of detrimental change to historic fabric, the removal of fabric is not documented by the HRB staff, and this change is then used as leverage that the resource is not historic. Will the EIRs address this problem? If not, why not?

B8-10 *g* Will the EIRs consider enforceable protections to facilitate historic property homeowners' compliance with the *Secretary of the Interior's Standards* and the retention of historic fabric? While we understand code compliance violations within potential historic districts are near the top of the priority list, the repercussions when compliance is not met are little more than a slap on the wrist. The regulations also need to be proactive toward developers that act first and seek forgiveness afterwards.

B8-11 *h* Will the EIRs consider infill guidelines to effectively protect the potential districts from incompatible change, i.e. scale, bulk, rhythm, and materials, for parcels that do not include a historic resource, but are located within a potential district? Isn't it true that infill guidelines are necessary to ensure the potential historic district remains intact until such time when the district is brought forward?

B8-12 *i.* Will the EIRs consider the following suggestions? If not, why not?:
The regulations' use of the term "original footprint" is ambiguous and will lead to trivial interpretive disputes; this term should be eliminated or clearly defined in the policy document. The limitation to keep exterior

B8-8 The Draft PEIR already considered the proposed amendments to the Historical Resources Regulations and additional revisions are not required. See response to comment B8-4. Additional PEIR revisions related to Historical Resources Board training is not necessary. The Historical Resources Board is an appointed body with authority over historical resources in the City and are well-practiced in designating individual historical sites, establishing historical districts, and reviewing development projects that may affect historical resources. At least 4 of the Board members meet the U.S. Secretary of the Interior's Professional Qualification Standards, and all Board members receive training on a yearly basis on the identification and preservation of historic resources. Historical Resources staff members also meet the U.S. Secretary of the Interior's Professional Qualification Standards, and attend professional seminars, trainings and conferences.

B8-9 PEIR revisions are not required. Window replacements within the original openings, which are the only window modifications exempt from a permit, do not in and of themselves preclude a building from contributing to a historic district; thus no project and/or EIR revisions are warranted.

B8-10 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. The amended Land Development Code regulations would be enforceable through Neighborhood Code Compliance. A permit would not be issued without compliance and consistency with all applicable regulations.

B8-11 The PEIR will not be revised as requested in this comment. Infill guidelines applicable to non-contributing resources would not be needed because existing zoning and land development code requirements would provide adequate regulations for bulk and scale appropriate to each specific Potential Historic District.

B8-12 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR, rather it addresses the proposed amendments to the Historical Resources Regulations. This comment suggests that corner properties would not be appropriately protected. Since circulation of the Draft PEIR for public review, the City has prepared revisions to the supplemental regulations for Potential Historic District to specifically address

visible alterations to the rear 1/3 of a building will facilitate inharmonious change and awkward projections, while simply requiring compliance with the *Secretary of the Interior's Standards* would allow property owners more flexibility and provide for a more harmonious project that is compatible with the surrounding neighborhood. Corner properties, having two full facades visible to public rights-of-way, are not appropriately protected under these supplemental regulations. Additional provisions need to ensure that these most visible properties are treated with extra sensitivity, as corner properties, have especially large visual impacts within historic districts.

Thank you for your attention to these comments.

Sincerely,

Susan Brandt-Hawley
Attorney for SOHO

B8-12 (cont.)

corner lots, and to define the term "original primary façade." The City does not agree that alterations to the rear third of a building would facilitate inharmonious change and awkward projections, as this comment suggests as the entirety of the structure would still be subject to applicable zoning limitations and would generally not be visible from the street.

Letter B9

From: jean rivaldi <jeanrivaldi@gmail.com>
Sent: Thursday, July 28, 2016 12:11 PM
To: Steinert, Kurtis
Cc: Serrano, Nick; South Park San Diego
Subject: Fwd: SPBG -- PEIR-Public Comments by Michael Gruby, PE
Attachments: Draft PEIR -Public Comment.pdf

Kurtis,

B9-1 This is in regard to Section 5.3.2 MITIGATION MEASURES: Chapter 5, page 10 of the the draft PIER (see attached document with Mike Gruby's comments).

B9-2 I support Mike Gruby's comments and suggestions in response to the mitigation measures the city is suggesting. As far as the plan calls for anything that eliminates parking along Fern street, this would have a disastrous effect for businesses in the area (more than 30 along the stretch between Juniper and Grape).

B9-3 We have worked long and hard to create a pedestrian climate to support walkability and create a healthy climate for business and their pedestrian customers in the neighborhood.

B9-4 We also currently have interest from residents and business-owners alike to close Grape street to vehicular traffic between 30th and Fern. This proposal by the city goes directly against that initiative and the wishes of the residents and business owners in the area.

B9-5 We ask that you please reconsider these recommendations and work together with the South Park Business Group on future plans for any change of traffic patterns on Fern Street and Grape Street as any changes in these areas will have a direct and serious impact on the businesses located there.

thank you,

Jean Rivaldi
President, South Park Business Group

REALTOR CalBRE #01948215
Certified Historic Property Specialist
p: 619.916.7247 e: jeanrivaldi@gmail.com
Facebook: SDRealtorJeanRivaldi
CommunityRealtyCoSD.com



1

B9-1 This comment is in reference to a more detailed comment letter provided by Michael Gruby regarding traffic mitigation measures included within the Draft PEIR around the vicinity of Fern Street and 30th Street and Juniper. Please refer to the responses to letter C9 for more details.

B9-2 The commenters support for the letter submitted by Mike Gruby is acknowledged. The proposed Golden Hill CPU emphasizes pedestrian-oriented development and preserving and promoting pedestrian access. No traffic mitigation measures are recommended that would discourage pedestrian activity in this area. Please reference Community Plan Figure 3-5: Planned Street Classifications.

B9-3 This comment is noted. Refer to response to comment B9-2 and the responses to letter C9.

B9-4 This comment is noted. Refer to response to comment B9-2 and the responses to letter C9.

B9-5 The City appreciates the commenter's participation in the public review process. These comments will be considered during the decision-making process.

Letter C1

July 28, 2016

Kurtis Steinert, AICP
Senior Planner
Environmental and Policy Analysis
City of San Diego
Planning Department
101 Second Ave, Ste. 1200, MS 413
San Diego, CA 92101

PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT No. 380611 / SCH No. 2013121076
COMMUNITY AREA: North Park and Golden Hill
COUNCIL DISTRICT: 3

RE: North Park Community Plan Update Draft Program Environmental Impact Report Public Review Comments

Dear Mr. Steinert:

C1-1 Thank you for the opportunity to provide comment and input on the Draft NP CPU PEIR. First, I wish to commend the City of San Diego for it works to update and implement the North Park Community Plan Update that will enable substantial benefits to our community. Please note that excerpts from the NP CPU PEIR are in *italics* and my comments and recommendation are in **bold** and made for the following sections:

C1-2 **3.0 Project Description**

Recommendation: Incorporate a specific comment on North Park's Community Plan Update (NP CPU) Complete Streets policies and measureable action items as referenced throughout the NP CPU elements.

C1-3 **Urban Design Comments**

"The proposed North Park and Golden Hill CPU provide detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, the prioritization and provision of public facilities, community and site specific urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources, within North Park."

"The PEIR includes recommended mitigation measures, which—when implemented—would lessen project impacts and provide the City with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. The PEIR

C1-1 Comment noted.

C1-2 Section 3.1 of the PEIR makes reference to the entire text of the proposed CPU and identifies the entirety of the CPU as part of the project analyzed in the Draft PEIR. Also, Section 3.4.1.2 includes a discussion of complete streets. Thus, additional information was not added as requested by the commenter.

C1-3 The City acknowledges that the Draft PEIR includes a number of significant and unavoidable impacts that at a program level of analysis could not be fully mitigated to less than significant. Many future projects implemented in accordance with the proposed North Park CPU would require a subsequent environmental analysis to identify the site-specific impacts and mitigation measures that are not possible to identify at a program level of analysis. Future implementation and construction of complete street measures identified within the North Park CPU would be evaluated as specific projects are proposed. Future complete street projects would be reviewed for consistency with the analysis contained within the Draft PEIR and application of the mitigation framework.

may serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the CPU areas, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, the City can approve the activity as being within the scope covered by this PEIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR."

The PEIR does not analyze VMT traffic related impacts or provide any mitigation for traffic related impacts for the numerous significant and unavoidable traffic impacts disclosed in the PEIR, therefore, the PEIR will not impose mitigation or monitoring within a Mitigation Monitoring and Reporting Program (MMRP). MMRP's assist future projects to building what Community Plan outlines under this EIR. The absence in this parent document of reliable mitigation analysis and enforceable measures, such as Complete Streets improvements impact on traffic Level of Service and Vehicle Miles Traveled impact on Greenhouse Gas emissions, equates to subsequent projects needing new analysis and studies.

The Draft North Park Community Plan's policies explicitly request Complete Streets and improvements to pedestrian, bicycle, and transit mobility facilities to be built in the public realm. San Diego is a Charter City, which does not require vertical conformance between its policies statements and implementing regulations, which means the city is legally held accountable for its public realm improvements responsibilities found in Mitigation Measures in the PEIR's MMRP.

Recommendation: The City should verify that the analysis sufficiently addressed minor modifications, such as travel lane reductions, future bicycle track lanes, removal of on-street parking, and curb extensions for added pedestrian capacity, to ensure that no additional traffic impact studies are required for these public improvements independently or associated with private development applications.

C1-4 **3.2 Relationship to the General Plan (page 3-2 – 180)**

"The proposed CPUs would build upon the vision, goals, and strategies of the General Plan. The proposed CPUs are intended to further express General Plan policies through the provision of site-specific recommendations that implement Citywide goals and policies at the community plan level, address community needs, and guide zoning. The General Plan and Community Plans work together to establish the policy framework for growth and development in the CPU areas. The Land Development Code within the Municipal Code implements the community plan policies and recommendations through zoning and development regulations."

"CPU implementation requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element;

C1-4 The comment does not raise an issue with regard to the adequacy of the Draft PEIR; thus, a more detailed response is not provided. However, the adopted Mid-City Planned District Ordinance (MCPDO) and its zones that have served as the community's zoning regulations will be replaced with citywide zones. This will serve to update development regulations as citywide zones have evolved to contain newer standards, and also allow more streamlined administration. Policies related to villages are implemented by the rezoning effort to apply citywide base zones with pedestrian orientation as their purpose. Various amendments to the Municipal Code are also proposed to help implement the vision of the CPU, including modifications to density and use requirements.

amendments to the LDC to remove North Park from the Mid-City Communities Planned District Ordinance (MCPDO); amendments to the Land Development Code (LDC) to rezone the area located in North Park Community Planning Areas from the Mid-City Communities Planned District to Citywide zoning; adoption of LDC amendments to allow for implementation of the community plan policies; amendments to the Neighborhood Development Permit (NDP) regulations to include Supplemental Design Regulations for Potential Historic Districts; and a comprehensive update to the existing Impact Fee Studies (IFS) (formerly known as Public Facilities Financing Plans) resulting in a new impact fee for each community."

Recommendation: The City should provide analysis and determination on the ability of city-wide zoning to implement the location specific Community Plan policies as opposed to the former Mid-Cities Planned Development Ordinance zoning tool crafted specifically for the 1986 updates.

C1-5 **3.4.1.3 Urban Design Element (pg 3-14, pg 192)**

"The proposed North Park Urban Design Elements describe existing community character and identity and provide goals and policies related to urban form, including public spaces and village design, neighborhood and community gateways and linkages, building types and massing, streetscape and pedestrian orientation, public views, urban forestry, and other unique aspects of the communities. These elements present the proposed urban form of the plan areas and highlight opportunities for urban design in the community."

Recommendations:

Consider updating our citywide CEQA Thresholds to include measures for 'Mixed-Use, Walkable Vertical Mixed Use Private Buildings' to be compatible with the expected outcomes listed in the General Plan PEIR MMRP.

Consider utilizing the area identified as Traditional Character Neighborhood (pg. 81 CPU) as a mitigation measure for future Historic Preservation Districts. These areas are identified for their 'historic character' to be preserved in this plan.

C1-6 **3.4.3.1 Citywide Rezoning (3-20)**

"Citywide zoning will be applied in all areas. Proposed densities will be consistent with existing zoning with the exception of Community Enhancement Areas in the North Park CPU area where increased density and modified development regulations would be allowed with processing of a PDP."

Recommendation: Create a city-wide Mixed-Use CC Zone that better fits the need for vertical mixed-use development on El Cajon Boulevard

C1-7 **Table 6.1-1 Applicable CPU Policies Related to Land Use (pg. 6.1-8, pg. 287)**

C1-5 Updates to the citywide CEQA Thresholds are not a part of the proposed project; however, the recommendation of the commenter will be considered. Policies and information contained in the North Park CPU are not specifically included as mitigation measures because they are part of the project and would be considered during project-specific review of future development, as applicable.

C1-6 This comment does not relate to the adequacy of the Draft PEIR; thus, a detailed response is not required under CEQA.

C1-7 This reference has been corrected in the Final PEIR.

Urban Design Element
Public Realm

"UE-2.2 Consider plazas, courtyards, pocket parks, and terraces with commercial and mixed-use buildings."

The correct UE-2.2 policy states: Accentuate key focal points and entrances, and corner of a development with art, signs, special lighting, and accent landscape. **Please remove this Incorrect Reference.**

"UE-2.5 Encourage the creation of public plazas at gateways, nodes, and street corners with transit stops to help activate street corners and provide a foreground to building entrances."

The correct UE-2.5 policy states: Provide continuous and consistently designed right-of-way improvements, so that a development project reads as one unified project. Create a seamless connection of landscape improvements between proprieties and across the streets. **Please remove this Incorrect Reference.**

Core and Mixed-Use Corridors

"UE-1.8 Preserve and encourage the enhancement of the Adams Avenue "Antique Row" and commercial node."

The policy reference is now located at UD-3.33. **Please remove this Incorrect Reference.**

Consistent Character Area

"UE-1.21 Preserve and retain the single-family character created by small lots along Mission Avenue."

This Policy does not exist and this topic, Consistent Character Area, does not exist in the NP CPU. **Please remove these Incorrect Reference.**

Gateways and Nodes

"UE-2.17 Preserve and encourage the continued enhancement of the Adams Avenue "Antique Row" and commercial node."

The correct location of policy is UD-3.33. **Please remove this Irrelevant to LU Reference.**

C1-8 **Recommendations for replacing the above incorrect policy references:**

UD-2.1 Create publicly accessible plazas and paseos as part of new development

C1-8 The recommended policies were added to the Final PEIR and are now consistent with the proposed North Park CPU.

(The intention is to enable these public space types to assist in counting towards our Park and Recreation Deficits outlined in MMRPs as they are required on all new development)

UD-2.13 Improve pedestrian environments in the community with wider sidewalks where needed, enhanced crosswalks and paving, and better access and connectivity, shaping-producing street trees, street furnishings, and amenities that support walking.

UD3.22 promote a strong pedestrian and bicycling orientation along ECB (a-c)
(Enable these on Pedestrian-Orientation policies in TOD Enhancement Program Streetscapes)

C1-9

Section 6.5: Greenhouse Gas Emissions

The City's Climate Action Plan (CAP) is meant to play a significant role in reducing greenhouse gases (GHG). This is a significant endeavor and essential to the future of not just North Park but to the City of San Diego. Please note that we offer the following recommended support of the Climate Action Campaign comments submitted to the North Park Community Planning Committee via Coast Law Group dated July 9, 2016.

6.5.5 Greenhouse Gas Mitigation Measures concludes that, "All impacts to GHG emissions would be less than significant. Thus no mitigation is required" pg 6.5.13

This statement is a significant error for the following reasons:

The PEIR fails to address or analyze environmental impacts pursuant to CEQA Guidelines Section 15064.4(b) (1), which is the responsibility of the city to provide. The 2016 Draft North Park Community Plan along with the just adopted new city standards for the affordable housing bonus density program will lead to increased density at build out.

The PEIR includes no quantitative data or analysis of how the density increase and the resulting increases in traffic and other impacts will affect greenhouse gases. The PEIR offers no mitigation to deal with the probable increase in GHG.

Recommendation: The Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan SCH #2014121002, April 26, 2016, pages E-8-9 includes quantitative modeling, therefore, the same standard of quantitative analysis should to be provided for North Park.

C1-10

It is well-understood that the State of California Office of Planning and Research (OPR) has not released its SB743 Vehicle Miles Traveled (VMT) Guidelines. However, the Cities of San Francisco and Pasadena have moved ahead of OPR and the City of San Diego to analyzed VMT in their plan update; SB743 is a State Law and while Guidelines are important, they are not required to be in conformance with State Law, which we know will result in required VMT studies for all future projects. Analyzing VMT in this PEIR will provide reliable mitigation analysis for future projects required in the NP CPU; SANDAG

C1-9 Responses to the referenced comments by the Climate Action Campaign comments (prepared by Coast Law Group) can be found in the responses to comment letter B1 included as part of the Final PEIR. The City does not agree that impacts were not analyzed consistent with CEQA Guidelines Section 15064.4(b)(1). The PEIR does include a quantities analysis of GHG emissions and shows that emissions with implementation of the North Park CPU would be greater than build-out under the current plan. Since the increased density is a direct result in revising the land use plan to be consistent with the City of Villages Strategy and the City's CAP, impacts would be less than significant.

The comment also recommends that a similar analysis be performed as the one performed for the Downtown San Diego Mobility Plan Final Supplemental Environmental Impact Report (SEIR) and references pages E8 and E9 of the Final SEIR for the Downtown San Diego Mobility Plan. This reference is to Topical Response #6: Overall Network Development and Traffic Operations, which includes a reference to the Mobility Study Technical Report. The hybrid model described in the Mobility Study Technical Report was a customized approach to the specific conditions in the Downtown area and is not applicable to analysis of transportation conditions the North Park CPU area.

C1-10 Refer to response to comment B1-5.

has performed a draft VMT analysis with 2010 VMT mean benchmarks for the region to streamline requested analysis for NP CPU PEIR.

Recommendation: Adequately analyze quantitative compliance the North Park CPU PEIR with the City of San Diego's Climate Action Plan and its targets and goals. As drafted, the PEIR demonstrates a lack of compliance with Climate Action Plan goals as it results in an increase in GHG emissions compared to baseline rather than a decrease of 15 percent by 2020, 40 percent by 2030, and 50 percent by 2035.

C1-11 Again, the City of San Diego Planning Department and Environmental Group is commended for seeking to legally enable and implement the North Park Community Plan Update. The results will bring substantial benefits to our community. The intention of these comments and recommendations is to provide future development a reliable PEIR that enables the mixed-use, multi-modal, and transit-oriented policies, plans, and projects for public and private applicants.

Sincerely,

Howard M. Blackson III, CNUa
Urban Designer
2425 29th Street
San Diego, California 92104

C1-11 Comment noted.

Letter C2

From: cwbrierton@aol.com
Sent: Monday, July 25, 2016 2:58 PM
To: PLN_PlanningCEQA
Cc: goldenhillplanning@sbcglobal.net; tershia@aol.com
Subject: CEQA Comment: PROJECT NAME : North North Park and Golden Hill Community Plan Update, project number 380611 3806

Kurtis Steinert ,
Senior Environmental Planner,
City of San Diego Planning Department,
1010 Second Ave . MS 413 ,
San Diego, CA 92101
PlanningCEQA@sandiego.gov

Comment on EIR for Greater Golden Hill Community Plan Update

C2-1 The current population of Greater Golden Hill is 15,900. The draft Community Plan Update projects an increase to 24,010 in about 20 years.
>
In my opinion, the draft is inadequate in projecting infrastructure and other needs for such a population/dwelling increase. Specifically :
>
C2-2 (1) A large portion of Greater Golden Hill is in a Very High Risk Fire Zone, yet the plan does not provide for increased needs such as additional nearby fire stations, nor for strict enforcement of City fire Codes for new construction, especially adjacent to canyon wild lands .
>
C2-3 (2) The plan recognizes the need to repair/replace sewer lines in canyon open space, but fails to specify the protections necessary for these lands.
>
C2-4 (3) Golden Hill has no parks (67 are required) to serve its present or future population. The plan essentially designates Balboa Park and portions of open space as parks. However, the plan fails to specify uses beneficial to the community as opposed to the entire San Diego Region (other than a multi-modal path on Golf Course Drive currently being "studied").
>
C2-5 (4) The proposed plan is inadequate in addressing traffic and parking needs.

Regards,
Cheryl Brierton
Resident/Homeowner, South Park/Greater Golden Hill
1329 Bancroft Street
San Diego, CA 92102
619-231-9888

C2-1 Comment noted. The City appreciates your participation in the public review comment process.

C2-2 Portions of the Golden Hill CPU area contain land designated as very high fire hazard severity zone, particularly in areas adjacent to and within canyons. However, a majority of the plan area is not within a fire hazard severity zone. As discussed in Section 7.12, Public Services and Facilities, at the programmatic level, the proposed increase in population would not require that the Fire-Rescue Department construct new facilities within the community plan area. As population growth occurs, the need for new facilities will be evaluated and identified. A new fire station planned at Home Avenue in the City Heights community is expected to provide additional fire service to the community plan area and is identified in the Golden Hill Impact Fee Study. All future individual development projects would be subject to compliance with applicable Municipal Code regarding emergency services requirements.

C2-3 This comment does not provide specific reasons for how the analysis in the PEIR is inadequate. This comment is referencing Policy PF-1.12 of the proposed Golden Hill CPU, specifically item E) of the policy, which states: "Upgrade the design of outmoded storm water infrastructure that discharges directly into canyon open space." This policy refers to existing infrastructure that discharges storm water into canyon open space and causes erosion problems. The upgrades required intend to benefit the natural canyon open space by minimizing erosion resulting from the storm water infrastructure. In addition, the proposed Golden Hill CPU policies LU-2.25, LU-2.26, LU-2.27, CE-2.3, CE-2.6, CE-2.7 and CE-2.10 provide for the protection of open space, its natural vegetation, and sensitive design of storm water infrastructure within the Golden Hill community.

C2-4 See Section 7.12.3, Impacts Analysis, of Section 7.12, Public Services and Facilities for a discussion of potential impacts to parks and recreation. The Draft PEIR acknowledges the deficiency in park space in the Golden Hill community. The proposed Golden Hill CPU Recreation Element provides a policy framework that supports acquisition and development of new public parks and park equivalencies and encourages new private development to include recreational facilities in an effort to reduce this deficit.

C2-5 This comment does not provide specific reason how the analysis in the Draft PEIR is inadequate. See Section 7.3, Transportation and Circulation, of the PEIR for a discussion of potential impacts related to traffic. Parking is addressed within the proposed Golden Hill CPU; however, the availability of parking is not an issue that requires analysis under CEQA.

Letter C3

From: Sam Chammas <bargoer13@gmail.com>
Sent: Thursday, July 28, 2016 9:52 AM
To: Steinert, Kurtis
Subject: South Park streets, please hold

C3-1 Please hold off on any street change ideas on 30th and Fern in South Park until businesses and residents can give their input. I recommend leaving Fern as is and making any improvements to 30th- it's so much wider and should be the main corridor through the neighborhood.

C3-2 Have you presented your ideas to the South Park Business Group? That would be a good next step.

Best - Sam Chammas, business and property owner on Fern st. Station Tavern and Whistle stop.

C3-3 On Thu, Jul 28, 2016 at 12:36 PM, Sam Chammas <bargoer13@gmail.com> wrote:
Hi Marsha. First I heard of these proposed changes. This is big and moving too fast. I recommend moving the date back for more input. My input now is leave Fern as is and use 30th for the changes. Similar to Gruby's comments.

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C3-1 While this comment does not provide specifics on adequacy of the EIR, it is assumed that the commenter is referring to the roadway segment mitigation measures included within the Draft PEIR for South Park in proximity to 30th and Fern Street. Please refer to the responses to comment letter C9 for additional information about the traffic mitigation referenced in the Draft PEIR for this area. Comment noted.

C3-2 Comment noted. The proposed Golden Hill CPU was presented to the South Park Business Group on several occasions. For additional detail on the public outreach process for the proposed CPU, please refer to the Staff Report.

C3-3 Comment noted. This comment is not related to the adequacy of the Draft PEIR.

Letter C4

From: Chelsea Marlene Coleman <chelseamarlene@gmail.com>
Sent: Thursday, July 28, 2016 12:14 PM
To: Steinert, Kurtis
Subject: Re: Michael Grubby's public comment to draft PEIR

Hi Kurtis,

C4-1 As a business owner on 30th and Juniper (The Rose Wine Bar), one block west of the proposed continuous left turn lane, I am very concerned about a loss of parking in a small business zone that has fought really hard to encourage walkability and street beautification. I agree with Mike that putting fast moving traffic directly next to the sidewalk would do great harm to the pedestrian traffic on Fern (or any other street for that matter). Please consider taking a pedestrian mall approach to the neighborhood of South Park and encourage grass-roots initiatives such as the one to create a Pedestrian Square at grape and Fern. As a member of the business group, a local resident and a business owner, I can not stress enough how a shared vision of a safe pedestrian neighborhood is the desire of all stakeholders in South Park.

Thank you for your consideration.
Chelsea Coleman
619 572 7671

C4-1 This comment is in reference to a more detailed comment letter provided by Michael Gruby regarding traffic mitigation measures included within the Draft PEIR around the vicinity of Fern Street and 30th and Juniper. Please refer to the response to letter C9 for more details. The proposed Golden Hill CPU does emphasize pedestrian-oriented development and preserving and promoting pedestrian access. No traffic mitigation measures are recommended that would discourage pedestrian activity in this area.

Letter C5

From: Manny Cruz <Manny@sandiegometro.com>
Sent: Sunday, July 24, 2016 2:55 PM
To: PLN_PlanningCEQA
Subject: Project Name: North Park and Golden Hill Community Plan Updates; Project No. 380611 / SCH no. 2013121076

C5-1 RE: Project Name: North Park and Golden Hill Community Plan Updates
Project No. 380611 / SCH no. 2013121076

The following story is scheduled for publication in August in the North Park News.

Manny Cruz
Editor, the North Park News
manny@sandiegometro.com

C5-2 Historical Society Slams North Park Community Plan Update
Group says EIR on plan faulty on many levels
North Park News Staff Report

A comprehensive and blistering analysis of plans to densify North Park has presented evidence that, contrary to official city projections, future development will worsen air quality, shrink the supply of affordable housing, erode historic neighborhood character, and violate city and federal environmental justice policies by displacing vulnerable residents.

The 24-page letter of comment, submitted to city planners July 17 by the North Park Historical Society (NPHS), was pointedly critical of many elements of the Draft Program Environmental Impact Report (PEIR) for the North Park and Golden Hill Community Plan Updates. More broadly, the historical society documented how the PEIR fell short of state environmental quality guidelines because it did not disclose available information about harmful density impacts and it did not include emphatic opposition from community stakeholder groups.

"Our analysis points out numerous inadequacies in the PEIR, and we urge the city to take all of our detailed points seriously," said NPHS Secretary Katherine Hon. "They simply have not given decision-makers the complete and accurate information needed to make an appropriate decision. The city should step back now, redo the PEIR, and recirculate it for public input."

The group's analysis specifically targeted the so-called "Pedestrian-Oriented Infill Development Enhancement Program," the core of the Plan Update. As stated in its cover letter, "NPHS is most concerned about the lack of disclosure … This density bonus program is not related to providing higher density along transit corridors. [It] targets existing two-story apartment buildings in a broad residential area between Lincoln and Howard avenues from Florida to Boundary streets for demolition and replacement with much higher density development, and [it] potentially affects historic single-family homes and bungalow courts as well."

On the issue of affordable housing and economic justice, the analysis noted that: The density bonus program area "is home to vulnerable low-income and minority populations who would be disproportionately impacted by displacement. … At least 1,740 relatively affordable housing units could be lost due to the program, and more than 3,600 people may be displaced."

Because it targets affordable housing in an area with high minority and low-income populations, the density bonus program "is in direct conflict with San Diego General Plan direction regarding Environmental Justice and violates federal Executive Order 12898 … by encouraging the disproportionate displacement of vulnerable populations. [It] therefore would not comply with the City's General Plan."

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C5-1 Comment noted. This comment is intended to notify the City of the publication of an article regarding the North Park Historical Society's (NPHS) comments on the Draft PEIR and does not address adequacy of the analysis presented in the Draft PEIR.

C5-2 Comment noted. This comment contains the article to be published regarding the NPHS's comments on the Draft PEIR. The comment does not address the adequacy of the analysis presented in the Draft PEIR. The NPHS comment letter on the Draft PEIR is referenced. Responses to the entire NPHS comment letter (comment letter B3) are provided in response to comments B3-1 through B3-88.

There is no requirement for affordable replacement housing in the area "because developers may pay an in-lieu fee if they choose. This will worsen the city's already severe deficit in affordable housing," according to the analysis.

The North Park plan update has been touted by city planners as a major step toward cleaner air quality that will help pry motorists out of their cars. But NPHS found that the update does not effectively make that case because it "does not provide any analysis to support the conclusion that the community villages 'would reduce reliance on the automobile and promote walking and use of alternative transportation.' In particular, there is no information presented regarding how the [update] would reduce work related trips or increase bus transit use."

In a subsequent section on greenhouse gas emissions, the analysis notes that "vehicle emissions are greater for the [plan update] than under the current community plan but are less than under existing conditions. This result should be explained further. If traffic volumes will increase in the future, how do emissions from vehicles decrease? Does the decrease come from improvements in vehicles or fuels, or from a projected decrease in vehicle miles traveled, or from another source?"

NPHS's most troubling finding may be that the PEIR repeatedly fails to disclose verifiable information about density impacts and neglects to include public opposition. Because a North Park Impact Fee study was excluded from the PEIR, the analysis said, "decision makers and stakeholders have been deprived of the opportunity to review and comment on an essential component of the Project. … thus rendering this aspect of the PEIR 'so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.'"

On the topic of public feedback, "the PEIR states that there are no clear-cut areas of controversy," the analysis notes. "This is false. NPHS and the University Heights Historical Society have written multiple letters objecting to the [density bonus] program … [and] multiple stakeholder organizations and residents have repeatedly opposed aspects of increased density."

One of the ironies of the flawed PEIR, said Hon, is that, instead of protecting the unique historical character that is a prized North Park asset, programs specified in the Plan Update would give incentives to developers to replace modest older homes with multi-story upscale complexes. "A lot of other areas try to fake historic character," she said. "We've got the real thing here in North Park. Once they take it away, it will be gone for good."

Asked if efforts to stop the Community Plan Update steamroller might be quixotic, Hon replied, "We may go down, but we will go down fighting."

Letter C6

TERSHIA D'ELGIN
Writer · Illustrator

July 26, 2016

NORTH PARK AND GOLDEN HILL COMMUNITY PLAN UPDATES
PROJECT #380611 SCH No. 2013121076
COMMUNITY AREA: North Park and Golden Hill
COUNCIL DISTRICT: 3

To whom it may concern:

C6-1 Whereas many dedicated planning committee members and other Golden Hill residents and business people have long toiled on this Update, with the goal of preserving and enhancing our neighborhood, the draft Update still fails to convey growing anxiety about our direction. I too have worked hard on this, as has our devoted community planner, Bernie Turgeon.

C6-2 From the very beginning, in nearly every element of the Plan Update, is a "rotten apple in the barrel" sensation. The Plan Update's many remarkable ambitions for Greater Golden Hill are restrained and in some cases made impossible by the seeming inevitability of infill imposed on this and other older neighborhoods. This inevitability manifests, element by element, flashing forward not into a sunny, pleasant future, but into crowding, air and water pollution, homelessness, traffic jams, and crime.

C6-3 Yes, this might be perceived as conjecture on my part, were the homeless not already living 100 feet from my property lighting fires that require fire response, were people not already parking across my driveway, were I not already picking up trash from the gutters and sidewalks, were cars not already piled up on C Street behind the traffic light every afternoon, were gunshots and cries not already common in the night, were the police not already doing raids down my alley and cordoning off my house without the courtesy to tell me they will do so.

C6-4 Prior to the additional 8,000 residents to be imposed on Greater Golden Hill in the next twenty years, right now, we do not have parks, we do not have street trash cans, we do not have adequate street trees or maintenance, we do not have adequate help from police, and utility and cellular leasees are not maintaining the easements and are cutting away at the urban forest. Not only is the draft Plan Update inadequate in projecting infrastructure and other needs for incoming population and dwellings. Greater Golden Hill already does not have this infrastructure and related services. Ergo, the rotten apple.

www.tershiadelgin.com · 619-239-6120 · tershia@aol.com · 2801 "B" Street, #150, San Diego, CA 92102

C6-1 Comment noted. The City appreciates your participation in the public review comment process.

C6-2 Comment noted. This comment does not relate to the adequacy of the Draft PEIR.

C6-3 Comment noted. This comment does not relate to the adequacy of the Draft PEIR.

C6-4 Comment noted. This comment does not relate to the adequacy of the Draft PEIR.

Specifically:

C6-5 #2 Land Use Element makes clear that there isn't just a paucity of parks. There are NO parks. Any discussion of increasing residency, given the circumstances described above, in a irresponsible, dangerous and costly trajectory. Please remove LU-2.27. Any remaining open space should be conserved, not open to development under ANY circumstances. And why, here in LU2. is there no recommendation for park development?

C6-6 #3 Mobility Element doesn't address current traffic and parking, much less future impacts. What and where are the services and infrastructure for the community's pedestrian population? Why are two spaces per residential unit not obligatory? (I know one-per-unit is the municipal standard, with the expectation that crowding will force people to use public transportation, but the evidentiary outcome is clogging out neighborhoods, increasing crime and costing taxpayers dearly.) By emphasizing sidewalks and omitting SHADE, this bullet, on ME-35, "*• Walkable neighborhoods that utilize pedestrian connections and improved sidewalks to create a safe, comfortable pedestrian environment*" conveys obliviousness to climate, heat-islands and air quality. Please add a bullet point about shade trees and vegetated parkways.

C6-7 #4 Urban Design Element In Key Proposals (UD60) and in Policies (UD64) please recommend widening parkways on little traveled streets, west of 30th Street. Widening parkways will allow for avenues with two rows of street trees on each side (4 rows altogether, like the "Green Street" park corridors planned for 14th Street downtown). Street Trees (and urban forestry) are addressed in the Urban Design element. South of A Street has enormous need for street trees. Suggest that a policy to include mandatory "treeing" of more than project frontage be mandatory for all new development permitting. It's hot and blighted over here.

C6-8 #6 Public Facilities Element does not address the critical, flammable vegetation and dwelling conditions on private land near canyons. Nor does it recommend brush-management plan updates and strict enforcement of municipal fire codes for new construction. On PF 131, the final bullet correctly identifies canyons' role in stormwater conveyance, but must emphasize vegetative, not concrete solutions. Further, new and remodeled dwellings near canyons must be obliged to capture and conduct their runoff AWAY from canyons, to avoid sedimentation and erosion.

C6-9 #7 Recreation Element's park equivalencies seem effectively to bump actual neighborhood parks into the realm of impossibility. Open Space areas already have trails, yet these trails are being counted as implementation of recreation standards – even though they already exist! The kiosks, benches and other accessories specified will be magnets for already thriving vandalism. No one will maintain them. Please remove these. There are no trash cans in these Open Spaces. The reliance on "Park equivalencies" in a community with not just inadequate park and rec facilities, according to City standards, but actually NONE at all! Outrageous! Should conventional recreational parks be added to this plan, please specify that they are NOT to be put in existing Open Space. The EXISTING pocket park (on Streets Division property opposite my house at 3105 C Street) on the north side of C Street, in the alley just west of Edgemont Street, is not on

C6-5 Comment noted. The comment does not relate to the adequacy of the Draft PEIR. Refer to Section 7.12.3, Impacts Analysis, of the Draft PEIR for a discussion on the potential impacts related to parks and recreation resulting from the proposed Golden Hill CPU. The Draft PEIR acknowledges the deficiency in park space within the Golden Hill community and that buildout of the proposed Golden Hill CPU would add additional population to the area, continuing the deficit of population-based parks. The proposed update to the Impact Fee Study for Golden Hill would include fees for future development that include fees for park funding. In addition, the Recreation Element of the proposed Golden Hill CPU provides policy framework that supports acquisition and development of new public parks and park equivalencies and encourages new private development to include recreational facilities. Golden Hill CPU policy LU-2.27 is specifically referenced. This policy, together with policies LU-2.25, LU-2.26, UD-3.26, UD-3.31, UD-3.33, CE-2.1, CE-2.2, CE-2.3, CE-2.4 and CE-2.4, would provide for a policy framework for conservation of open space and its natural resources consistent with the Environmentally Sensitive Lands regulations. Development, where currently permissible, would be restricted to least sensitive areas and open space would be conserved by easement or dedication.

C6-6 Comment noted. The comment does not relate to the adequacy of the analysis presented in the Draft PEIR; however, the following is provided for informational purposes. Section 7.3.1.6, Alternative Transportation Facilities, of the Draft PEIR provides a description of the existing transit, bicycle, and pedestrian facilities in the Golden Hill Community. The proposed Golden Hill CPU does not include a parking space requirement per residential unit. Though shade trees are not included in the goals on page ME-35 of the proposed Golden Hill CPU, policy ME-1.6 on page ME-39 does: "Provide shade-producing street trees, pedestrian-oriented street lighting, and street furnishings with an emphasis along routes to schools and transit." Policies UD-2.33, UD-2.35, and UD-2.38 also call for the provision of street trees in pedestrian environments.

C6-7 Comment noted. The comment does not relate to the adequacy of the analysis presented in the Draft PEIR; however, the following is provided for informational purposes. The proposed Golden Hill CPU includes several policies aimed in whole or in part at increasing trees in the community plan area, including Policies ME-39, UD-2.3, UD-2.16, UD-2.19, UD-2.20, UD-2.31, UD-2.33, UD-2.35, UD-2.38, EP-1.2, and EP-2.4. UD-2.38 specifically encourages a double row of trees where sidewalks and building setbacks exceed a total of 20 feet. Several other additional policies that promote the appropriate installation and maintenance of landscaping and trees are included in the proposed Golden Hill CPU.

C6-8 Comment noted. The comment does not relate to the adequacy of the analysis presented in the Draft PEIR; however, the following is provided for informational purposes. Policy PF-2.3 of the proposed Golden Hill CPU specifically addresses brush management, calling for "efforts by the City to educate and inform the community regarding fire prevention techniques related to brush management and wildfires." Policies UD-3.31, UD-3.32, and UD-3.33 of the proposed Golden Hill CPU call for appropriate design when adjacent to canyons to minimize disturbance to natural landforms and provide fire-safe design and landscaping.

C6-9 Comment noted. The comment does not relate to the adequacy of the analysis presented in the Draft PEIR; however, the following is provided for informational purposes. The existing "pocket park" located on C Street, opposite 3105 Street is not shown on Table 7.1 of the proposed Golden Hill CPU because the land is dedicated for street purposes and in order to use this area for a park the road easement would need to be vacated and there would have to be willing sellers on each side of the vacant street that would sell the land to the City at fair market value. Additionally, the site is below the grade of the street which does not allow for good visibility from the street and would be a security issue for a future park. The site has steep topography which reduces the amount of useable park land and would present accessibility issues for users.

Table 7.1. **Please add it.** The City and Urban Corps have twice vegetated it. It is not maintained, except by neighbors, but it is enjoyed.

C6-10 #8 Conservation Element again recognizes the need to repair/replace sewer lines in canyon open space, but fails to specify the protections necessary for these lands. It also fails to improve construction guidelines (whether municipal or private) such that erosion and other stormwater violations will not occur.

C6-11 I look forward to a certain amount of revamping of the PEIR, which will reflect response to ardent concerns, mine and many other Golden Hill residents. Thank you for the opportunity to comment.

Sincerely,

Tershia d'Elgin
3105 C Street
San Diego, CA 92102
tershia@aol.com
619.239.6120

C6-10 Comment noted. The comment does not relate to the adequacy of the analysis presented in the Draft PEIR; however, the following is provided for informational purposes. The referenced policy refers to existing infrastructure that discharges storm water into canyon open space and causes erosion problems. The upgrades required intend to benefit the natural canyon open space by minimizing erosion resulting from the storm water infrastructure. In addition, the proposed Golden Hill CPU policies LU-2.25, LU-2.26, LU-2.27, CE-2.3, CE-2.6, CE-2.7, and CE-2.10 provide for the protection of open space its natural vegetation and sensitive design of storm water infrastructure within the Golden Hill community. When specific sewer line replacement projects are proposed, site-specific evaluation would be conducted including preparation of erosion control and storm water plans.

C6-11 The City appreciates your participation in the public review comment process. Though the comments included in this letter were primarily comments on the proposed Golden Hill CPU and not regarding the adequacy of the Draft EIR, all comments will be considered during the decision-making process.

Letter C7

From: Ryan Eddings <ryan.eddings@gmail.com>
Sent: Thursday, July 28, 2016 5:00 PM
To: PLN_PlanningCEQA
Subject: North Park and Golden Hill Community Plan Updates; PROJECT No. 380611

To whom it may concern:

C7-1 I respectfully submit the following comments and questions to you as part of the draft PEIR process for the North Park and Golden Hill Community Plan Updates. The city's CEQA website (https://www.sandiego.gov/planning/programs/ceqa) currently states that comments are due on July 28, 2016. The draft PEIR (https://www.sandiego.gov/sites/default/files/north_park-golden_hill_cpus_draft_peir.pdf) states that comments were due on July 14, 2016. I hope you will accept these comments as part of the official record due to this discrepancy.

C7-2 The city's General Plan calls for the adoption of 4,534 acres of 'Multiple Use' (MU) zoned land, a substantial portion of which, according to General Plan Map LU-2, was allocated to the Adams Ave., El Cajon Blvd., University Ave., Park Blvd., and 30th St. corridors. Instead, these corridors were primarily designated as commercial.

C7-3 An important distinction be multiple use and commercial zones is that multiple use requires residential uses with commercial permitted, whereas commercial zoning requires commercial uses with residential permitted. From a political economy perspective, this may have substantial ramifications for residents. For example, the municipal code for noise levels outlines residential and commercial zones, with commercial zones permitted higher noise levels than even high-density multi-family residential uses. Residents living in commercial zones, therefore, can be subjected to higher noise levels by law. Additionally, contested spaces like alleys or bikeways in commercial zones may not be designed towards residents' needs, but rather towards business needs (in spite of the fact that hundreds of people may live on a stretch of an alley or want to use a bikeway). For example, the bikeway gap on University is likely the result of disproportionate business power.

C7-4 Please note that 'Multiple Use' is still not even a zoning designation in the municipal code in spite of the fact that it is called for in the General Plan. This should not, however, absolve the Planning Department from appropriately using these zones as called out in the General Plan

C7-5 • With this in mind, why were the 'multiple use' designations from the General Plan ignored in the Adams Ave., El Cajon Blvd., University Ave., Park Blvd., and 30th St. corridors?

C7-6 • Why were the Adams Ave., El Cajon Blvd., University Ave., Park Blvd., and 30th St. corridors designated as 'commercial' instead of 'multiple use?'

1

C7-1 Comment noted. This is an introductory comment. The City appreciates your participation in the public review comment process. All public comments received through July 28, 2016 will be considered and responded to in the Final PEIR.

C7-2 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. While the community plans are components of the General Plan, they are intended to further express the General Plan policies specific to the needs of each community.

General Plan Figure LU-2 reflects adopted community plan land use designations to assist citywide analysis and it is not intended to guide future community plan updates. Furthermore, the General Plan includes Multiple Use as a General Plan land use category, which includes different types of villages as recommended community plan land use designations. The CPU identifies two Community Villages, 30th Street and University Avenue Community Village and 30th Street and El Cajon Boulevard Community Village, both the Land Use Element (as addressed in Section 2.3, in particular in Figure 2-3) and the Urban Design Element (as addressed in Section 4.3) include policy guidance with regards to Community Villages. The "commercial" land uses designated by the proposed North Park CPU (Neighborhood Commercial and Community Commercial) both allow a mix of commercial and residential uses and are consistent with the General Plan "Multiple Use" land use category.

C7-3 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. Rather, this comment clarifies the differences between multiple use and commercial zones and potential ramifications of each. The City will consider all comments during the decision-making process.

C7-4 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. While community plans must be consistent with the General Plan, they provide more detailed land use designations and site-specific policy than that of the General Plan. The General Plan includes Multiple Use as a General Plan land use category; however, it includes different types of villages as recommended community plan land use designations under the Multiple Use category. The Land Development Code includes citywide zones, which implements the land use designations identified in the General Plan and the community plans; however, the zones nomenclature may differ from the General Plan and Community Plan land use designations. The zone's intent, allowed uses, and development regulations are considered when selecting appropriate zones that implement land use designations.

C7-5 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. As previously stated, the commercial land uses designated by the proposed North Park CPU (Neighborhood Commercial and Community Commercial) both allow a mix of commercial, office, and residential uses and are consistent with the General Plan "Multiple Use" land use designations. Thus, the land uses called out in the General Plan were not ignored. Furthermore, the CPU Land Use Element is considered as a component of the General Plan Land Use Element and, therefore, is considered as a refinement to the broader General Plan Land Use designations.

C7-6 See response to comment C7-2.

C7-7 • Given that a substantial portion of 'multiple use' properties were designated to North Park in the General Plan, where does the city intend to otherwise designate 'multiple use' properties?

C7-8 • Given the possible equity issues described above, and the inconsistency between the North Park Plan and the General Plan, what is the proposed resolution?

C7-9 • Given the possibility of unreasonably high noise levels throughout an alley as a result of 60' tall buildings (with no setbacks) abutting both sides of a 20 foot wide right-of-way, how does the city intend to equitably and adequately mitigate this potential noise issue?

C7-10 • Have noise studies been conducted regarding the effects of 60' – tall buildings abutting a 20 foot wide right of way that produces an urban canyon effect?

Sincerely,

Ryan Eddings

C7-7 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. See response to comment C7-2.

C7-8 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. There is no inconsistency between the proposed North Park CPU and General Plan as suggested in this comment letter; therefore, a more detailed response is not warranted.

C7-9 This comment does not suggest an inadequacy in the analysis presented in the Draft PEIR. Refer to Section 6.6, Noise, of the Draft PEIR for a detailed analysis on potential noise impacts that would result from build-out of the proposed North Park CPU.

C7-10 A noise study was prepared and included with the Draft PEIR as Appendix F, Noise Analysis for the Uptown, North Park, and Golden Hill CPUs. This noise analysis considers noise impacts at a program level of analysis. As future projects are proposed consistent with the North Park CPU, site-specific noise analyses would be required during discretionary reviews. The Draft PEIR provides a mitigation framework (Section 6.6.6 of the Draft PEIR) to ensure noise impacts are evaluated during future discretionary project reviews. However, even with implementation of the mitigation framework, the Draft PEIR concludes significant and unavoidable noise impacts would occur as a result of implementation of the North Park CPU for ambient noise, vehicular noise and temporary construction noise (vibration).

Letter C8

From: Richard Gardiol <naturalresource@sbcglobal.net>
Sent: Friday, July 22, 2016 9:16 AM
To: PLN_PlanningCEQA
Subject: PROJECT NAME: North Park and Golden Hill Community Plan Updates PROJECT No 380611 / SCH No. 2013121076

Dear Sirs,

C8-1 I am submitting this comment with the hope of it being found by a law abiding person of integrity.
I am Richard Gardiol and I received the email copied below from the Director of Development Services, Robert A. Vacchi, explaining how a microbrewery could be permitted next door to my home and 13 others without any written notice to anyone in the area. Please look it over and then read my comments below.

Oct 16 at 1:12 PM

Mr. Gardiol,

C8-2 The City of San Diego recently approved a zoning affidavit and construction permits for a microbrewery use at 4542 30th Street. The site is located in the Mid City Planned District Ordinance CL-2 zone, which is a linear commercial zone that allows a variety of residential, commercial, and light industrial uses. See Section 1512.0305 use table for additional information.
<http://docs.sandiego.gov/municode/MuniCodeChapter1 >5/Ch15Art12Division03.pdf

The CL-2 zone allows restaurants with liquor/beer/wine, liquor stores and light manufacturing uses by right, meaning that such uses may be established without public notice or discretionary permits. Small beer manufacturers are classified as light manufacturing for zoning purposes. The use is also subject to a Type 23 license issued by the California Department of Alcoholic Beverage Control. You may contact that department for information related to public notice requirements for Type 23 licenses.

The North Park Community is presently updating its Community Plan. Part of that process will also include updating the existing zoning for the community. If you are interested in changing what type of development/uses are allowed in that area for future development, I would encourage you to participate in the plan update/rezone process. You may contact community planner Marlon Pangilinan at (619) 235-5293 for further information related to the Community Plan Update.

Robert A. Vacchi
Development Services Director
City of San Diego

C8-3 As professional planners you must already know that Section 1512.0305 actually prohibits non retail alcoholic beverage outlets (type 23), microbreweries and their tasting rooms from being placed in a CL-2 zone without a conditional use permit.

Microbreweries are classified as an industrial use in the municipal code for good reason; They carry non retail licenses that are completely different from retail licenses. Retail licenses have strict location requirements, written notification requirements, Public Convience and Necessity requirements, and operation requirements. Licensing for microbreweries intended by the State of California for use in industrial zones only, are exempt from all of the above.

The microbrewery next door to my home has destroyed the quiet enjoyment and full use of my property. Nasty odors from the brewing process come into my home from a brewery vent just 20 feet away. Noisy machinery located in the open is running 24 hours a day. There is exposed storage of beer kegs, wooden pallets and other material. Bar patrons whooping it up make it impossible to get any peace and quiet inside my own home. Bar patrons hang out on the side walk and my property smoking (tossing debris everywhere), urinating, vomiting, defecating, and conversing in loud drunkenness. I am personally intimidated by the gangs of rough talking beer drinkers hanging out on my driveway and under the street light just beyond. I have complained to Development Services, the Mayor, my councilperson, the Planning Dept., the North Park Planning Committee and everyone else I could think of to no avail. I have filed numerous complaints with Code Enforcement and they refuse to enforce the code.

C8-4 Director Vacchi suggests I take part in the plan update/ rezone process if I am interested in change. Actually I am just fine with the zoning as is; the municipal code prohibits microbreweries, without conditional use permits, in commercial zones. What needs change is the officials in charge of enforcing the zoning laws.

Now what are you going to do to clean up this mess ? My guess is you will do nothing meaningful. Even if you stipulate that microbreweries require a conditional use permit to operate in the commercial zones of North Park and Golden Hill, the Mayor and Director of Development Services will be perfectly comfortable ignoring the law as they have done in my neighborhood and throughout the city.

C8-5 Now is the time for you and the Planning Department to end the charade of writing ordinances that will be ignored by city law.

1

C8-1 Comment noted. The City appreciates your participation in the public review comment process.

C8-2 This comment does not suggest an inadequacy of the Draft PEIR. The comment includes a message from the City of San Diego Development Services Director regarding a zoning affidavit and construction for a microbrewery use at 4542 30th Street.

C8-3 This comment does not suggest an inadequacy of the Draft PEIR. The comment is related to a microbrewery use adjacent to the commenter's home.

C8-4 This comment does not suggest an inadequacy of the Draft PEIR. The North Park and Golden Hill CPUs were updated to address key issues and proposed solutions specific to the two communities. The CPUs, together with the General Plan, provide a policy framework for growth and development in the CPU area.

C8-5 This is a closing statement and does not suggest an inadequacy of the Draft PEIR.

enforcement officials in favor of special interests, the purveyors of alcoholic beverages. Now is the time to act like an American Citizen concerned with the due process of law guaranteed in the Constitution. Freedom and Democracy can not endure if the officials we rely on to enforce the law are using their powers to deny citizens their rights under the law.

Richard Gardiol
4550 30TH Street
San Diego
619 282 0172

Letter C9

Draft PEIR - Public Comment by Michael Gruby, PE

July 26, 2016

Kurtis Steinert, AICP
Senior Planner, Environmental and Policy Analysis
City of San Diego
Planning Department
1010 Second Ave, Ste 1200 , MS 413, San Diego, CA 92101
619.235.5206
ksteinert@sandiego.gov

Dear Mr. Steinert:

C9-1 Please consider these comments in finalizing the PEIR.

C9-2 Section 5.3.2 MITIGATION MEASURES: Chapter 5, page 10

SEGMENTS

- "**Fern Street from Juniper to Grape Street:** Restripe the roadway to a 2 lane collector with continuous left-turn lane. Golden Hill CPU significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure."

Comment by Mike Gruby: This section is the heart of the business district of South Park and would call for the COMPLETE ELIMINATION OF PARKING, which serves as a safety barrier for pedestrians. It would put fast moving traffic right against the curb adjacent to heavy, desirable pedestrian traffic that makes South Park a walking community. sidewalk widths all along Fern Street varies from small to substandard. I think the study did not realize that Fern Street is only between 34' and 40' wide with traffic speeds of 30+ MPH.

I suggest that the mitigation should be to direct the through traffic to 30th street, and that bicycle traffic should be directed to Dale Street at Juniper for south bound, and at Beech for north bound, and eliminate the "Sharrows" on Fern Street.

C9-3

- **"Fern Street from Grape Street to A Street:** Widen the roadway to a 4 lane collector. Golden Hill CPU significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure."

Comment by Mike Gruby: Fern street between Grape and Date Streets is 34' wide with minimal sidewalks. This solution would eliminate all the parking which would be and EXTREME hardship to all residents as well as create an extreme hazard to pedestrian traffic on the sidewalk. As it is traffic speeds increase from Grape to Cedar because of the 5 block run with no stop signs.

I suggest that the mitigation should be to direct the through traffic to 30th street, and that bicycle traffic should be directed to Dale Street south bound at Juniper and at Beech Street north bound, and eliminate the "Sharrows" on Fern Street.

C9-1 Comment noted.

C9-2 This comment makes reference to Section 5.3.2 of the Traffic Impact Study included as Appendix B-1 of the Draft PEIR. The comment is about the identified mitigation measure to restripe the roadway to have a continuous left-turn lane along Fern Street from Juniper Street to Grape Street. This measure is also described as mitigation measure TRANS 7.3-12a in Section 7.3.5.2 of the Draft PEIR. The mitigation measure referenced by the commenter is included within the PEIR to identify mitigation that could reduce impacts to less than significant. However, as stated in the introductory language to Section 7.3.5.2 of the Draft PEIR, of all the roadway segment mitigation measures, only TRANS 7.3-8b, TRANS 7.3-9b, and TRANS7.3-9c are proposed as part of the Golden Hill CPU and associated discretionary actions and are included within the proposed Impact Fee Study (IFS). Thus, the project does not recommend implementation of the measure described as TRANS 7.3-12, but provides the measure in an effort to disclose what could be done to reduce the significant impact. Implementation of this measure is not recommended by staff because it would conflict with the mobility goals of the proposed CPU to enhance the pedestrian environment and retain parking in areas where it supports business and provides a buffer between the street and sidewalks. The commenter's suggestion about an alternative measure is noted. Through traffic currently has the option of using 30th Street. Note that the Golden Hill CPU planned bicycle network identifies a portion of Dale Street as part of the network.

C9-3 This comment refers to mitigation measure TRANS 7.3-12b to widen Fern Street to a 4-lane collector. Similar to the comment above, implementation of this measure is not recommended for implementation for the reasons stated by the commenter. The measure is listed to provide information regarding what could be done to mitigate the significant impact; however, ultimately the measure is not recommended due to inconsistency with the overall goals of the CPU and due to potential impacts to developed private properties. The commenter's suggestion about an alternative measure is noted. The information about the 1987 study and the need for traffic calming measures on Fern Street is noted. The recommendations provided by the commenter will be included as part of the Final PEIR to be considered by the decision maker.

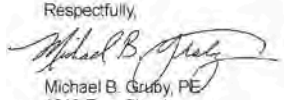
Note: There was a 1987 study titled "Golden Hill Fern Street and 30th Street Revitalization Plan" that addressed the problems that are still with us today. Some of the mitigation of that plan have been implemented, but some remain. Currently and in the future, we will need calming measures on Fern Street south of Fir. I suggest that parking be added back to the west side of the street to slow the traffic. We are expecting Continental Crosswalks installed at Fern and Fir, and in the future at 30th and Fir and 30th and Elm. Here is a link to the study:
https://www.sandiego.gov/sites/default/files/legacy/planning/community/profiles/greatergoldenhill/pdf/goldenhillfernstreetand30thb.pdf

C9-4 The table on page 6-8 of the Draft PEIR projects ADT after mitigation at 15,000. The 1987 study had already shown the ADT between 10,000 and 12,000 (that was 29 years ago!) The street is probably close to capacity now, so mitigation in the form of increased traffic capacity, can only occur by moving some of the traffic to wider streets (30th, Dale).

- **"Grape Street from 30th Street to 31st Street:** Restripe the roadway to a 2 lane collector with continuous left-turn lane. Golden Hill CPU significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure."

C9-5 Comment by Mike Gruby: The study didn't realize that Grape Street from 30th to Fern is 2 lanes, no parking. Widening it would destroy Grape Street Square, the center piece and only "park like" element in South Park and probably require taking of private land. There is currently an citizens initiative underway to CLOSE this section of roadway and expand Grape Street Square into a mini-park. This is the most complicated and hazardous intersection in the community, and closing the section will lessen the hazard, significantly Suggested mitigation for Grape Street from Fern to 31st Street may help in calming the traffic.

Respectfully,



Michael B. Gruby, PE
1912 Fern Street
San Diego, CA 92012
858-333-5875

C9-4 This comment is noted. It is unclear exactly what location the comment is referencing; however, Table 6-7 of Appendix B-1 provides a Post Mitigation Summary of Roadway Segment Analysis – Golden Hill. This table shows Future ADT along Fern Street from Grape Street to A Street as 15,000. The existing roadway segment average daily trip volumes for Golden Hill are shown on Figure 7.3-2 of the Draft PEIR and shows that Fern Street from Grape Street to A Street has a volume of 8,082 average daily trips. The Draft PEIR recognizes that in the existing condition, this segment operates at a LOS F. The difference in reported ADT from the 1987 study and the PEIR could be based on a number of reasons, including different methodologies and assumptions.

C9-5 The referenced mitigation measure (TRANS 7.3-13, in Section 7.3.5.2 of the Draft PEIR) is provided for informational purposes to identify what mitigation could be implemented to reduce the impact to less than significant. However, as stated in the introductory language to Section 7.3.5.2 of the Draft PEIR, of all the roadway segment mitigation measures, only TRANS 7.3-8b, TRANS 7.3-9b, and TRANS7.3-9c are proposed as part of the Golden Hill CPU and associated discretionary actions and are included within the proposed IFS. Implementation of the mitigation measure is not recommended because it would require the removal of approximately 13 on-street parking spaces which support adjacent businesses. The existing parking also provides a pedestrian separation from vehicular lanes, increasing safety and comfort for pedestrians. For these reasons, implementation of this improvement would conflict with Policy ME-4.7 and is not recommended for implementation

Letter C10

From: V Gutierrez <vernitagutierrez@yahoo.com>
Sent: Thursday, July 14, 2016 4:41 PM
To: PLN_PlanningCEQA
Subject: Project Name: North Park and Golden Hill Community Plan Updates. Project No. 380611 / SCH No. 2013121076

Kurtis Steinert
Senior Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
San Diego CA 92101

Dear Mr. Steinert:

C10-1 I am writing as a North Park homeowner to express my concerns over what I perceive to be a lack of transparency and input from residents with regard to the North Park Community Plan Update.

In my recollection, at no time did I receive notification from the City of San Diego regarding opportunities to hear presentations or give input. My understanding now is that it is incumbent upon interested parties to actively seek out that information, and that being able to give meaningful feedback requires reviewing tedious amounts of sometimes difficult-to-comprehend documentation. Additionally, most residents have little knowledge of urban planning discipline, lexicon and processes which adds to our disadvantage and, in my opinion, leads to a lack of knowledge and understanding of the impacts--both positive and negative--of such projects among residents, further exacerbating feelings of disenfranchisement. This is a HUGE disservice to residents and homeowners!

C10-2 Furthermore, I have deep concerns regarding what I perceive to be "unhealthy" development projects which may under the CPU continue to proliferate my community resulting in displacement of residents who stand to benefit most from community improvement.

C10-3 Now...after reading the "Conclusions" statement written by the City of an Diego Planning Department regarding the Environmental Impact Report, I would like to request CLEAR and concise responses and solutions to the issue areas identified which could result in significant environmental impacts: Transportation and Circulation, Air Quality, Noise, Historical Resources and Paleontological Resources.

In hopes of a mutually satisfying resolution, I welcome your comments and suggestions on these matters. Thank you for your attention.

Respectfully,

Vernita Gutierrez

C10-1 Comment noted. The comment is not related to the adequacy of the Draft PEIR. Information regarding the public outreach and engagement process for the CPU was extensive and is further detailed within the Planning Staff Report.

C10-2 The comment raises a concern about "unhealthy" development projects that may displace residents that would benefit from community improvement measures. The comment is general in nature and does not raise a specific issue with regard to the adequacy of analysis within the Draft PEIR; thus, a detailed response cannot be provided. Potential impacts related to displacement of residents were found to be less than significant in Chapter 8.0 of the Draft PEIR.

C10-3 The Draft PEIR includes a summary table which provides a summary of the significant impacts and associated mitigation measures. Where no mitigation was available to reduce significant impacts, this is stated in a brief and concise table format. Refer to Table S-1 of the Draft PEIR.

Letter C11

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July 24, 2016

Kurtis Steinert
Senior Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 413
San Diego, CA 92101

Subject: Comments of Draft Program Environmental Impact Report for
PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT NO. 380611/SCH No. 2013121076

Dear City Staff and Decision Makers:

C11-1 As former Chair of the University Heights Historical Society (UHHS), former member of the Board of the University Heights Community Development Corporation (UHCDC) and member of the University Heights Community Association (UHCA), I have provided input in these various capacities to the North Park Community Plan Update since the start of the update process in 2010.

I have reviewed the Draft Program Environmental Impact Report for the North Park and Golden Hill Community Plan Updates dated May 31, 2016 ("PEIR") as well as the extensive comments on the PEIR submitted to the City by the North Park Historical Society (NPHS), dated July 17, 2016.

Based on my review and that of the NPHS, the PEIR is not a sufficient informative document for decision makers and the public as required by California Environmental Quality Act (CEQA) Guidelines Section 15151, which states in part, "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences...The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." Following are my specific comments on the PEIR.

COMMENTS ON EXECUTIVE SUMMARY

C11-2 **Section S.3: Areas of Controversy**

The PEIR states that there are no clear-cut areas of controversy. This is false. The University Heights Historical Society, University Heights Community Development Corporation, University Heights Community Association, and Principal of Birney Elementary School have written multiple letters objecting to the density proposed for the site at 4353 Park Blvd., as well as density bonus proposed for the Pedestrian-Oriented Infill Development Enhancement Program area.

C11-1 Comment noted, this comment provides introductory statements. While this comment suggests that the PEIR is insufficient for informative purposes, the City does not agree. The comments provided will be included with the Final PEIR to be considered by the decision makers.

C11-2 Section S.3 Areas of Controversy has been updated to acknowledge the concerns received by the City

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C11-3 In a letter to Lara Gates dated March 21, 2016, the UHCDC states:

> "However, we have serious concerns about the following areas: **(1) 4353 Park Blvd.**, which in the February 2016 Land Use Element, the base density was increased to Community Commercial (0-109 du/ac). This site, located between Meade and El Cajon Blvd. is directly across from Birney Elementary School and abuts the southern boundary of the historic University Heights neighborhood commercial area along Park Blvd. from Adams Avenue to Meade. This site should act as a buffer zone between the high densities proposed on El Cajon Blvd. and the rest of the low to moderate density of the historic University Heights commercial area along Park Blvd. and the adjacent residential areas. Traffic congestion at the major intersection of El Cajon Blvd. /Park Blvd. /Normal St. is a problem; in addition, this is a major transit service area. Two workshops in May 2013 and October 2015 were presented by the University Heights Historical Society during which over 150 UH residents voted in support of Community Commercial (0-29 du/ac) for this site.
>
> **(2) Pedestrian-Oriented Infill Development Bonus Area.** For this residential area located between Park Blvd., the 805 freeway, Howard Avenue and Lincoln Avenue, the City recommended in the January 2016 Land Use Element a base density of Residential-Medium (30-44 du/ac) and also introduced a new Density Bonus Plan that will allow up to (73 du/ac) to "applicants with development projects of 6 dwelling units or more." This 100-acre neighborhood contains over 200 historic single-family homes and bungalow courts with an average age of 90 years, putting these structures at significant risk for development by the proposed Density Bonus. Furthermore, this area has an average density of approximately 20 units per acre (considered Residential-Medium density by the City). The allowable base density for this area is 44 du/ac, which will more than accommodate SANDAG's projected growth."

C11-4 In a letter to Lara Gates dated April 11, 2016, the UHHS states:

> "The proposed Pedestrian-Oriented Infill Development Enhancement Program will put a significant number of historic properties at risk in the large residential area bounded by El Cajon Blvd., Lincoln Ave., Park Blvd. and Texas St. This area contains 50 homes more than 100 years old and 200+ homes over 75 years old, with an overall average of 90 years old."

C11-5 In a letter to Marlon Pangilinan dated December 1, 2015, UHCA states:

> "The southeast corner of Park Blvd and Meade Ave is currently a church with two small buildings and a parking lot. There is a wide discrepancy in how the city and our community believes this property should be handled. The city proposes it be designated Community Commercial with 0-73 du/ac while the majority of residents feel the Neighborhood Commercial with a 0-29 du/ac is appropriate."

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C11-3 Section S.3 Areas of Controversy has been updated to acknowledge these concerns. The comment implies that the Pedestrian-Oriented Infill Development Enhancement Program would result in destruction of single-family homes and bungalow courts; however the program only applies to the redevelopment of multi-family units built from the 1960's through the 1980's with 6 or more dwelling units.

C11-4 Refer to response to comment C11-3.

C11-5 This comment does not raise an issue with regard to the adequacy of the PEIR, thus no further response is required. However, all comments will be provided to the decision maker for consideration.

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C11-6 In an email to Lara Gates dated March 25, 2016, Birney School Principal Amanda Hammond-Williams states,

> "I have reviewed the proposed North Park Land Use Element dated February 2016 as it affects University Heights and have serious concerns about the excessive density proposed for the site located at 4353 Park Blvd., currently occupied by the New Vision Fellowship Church. This site is located directly across from Birney Elementary School. As Principal, I am very concerned about the potential safety risks to our students by the addition of up to 400 to 500 dwelling units directly across the street. Such excessive density not only poses traffic safety risks for school children walking or biking on Meade Avenue to cross Park Blvd., but for any school child walking or biking near the school.
>
> Many of our 600 students live east of Park, within walking distance of the school. Crossing Park Blvd. at Meade is the most direct route to the school for those living east of Park. Further, such high density will significantly increase westbound traffic along Meade to the north-south corridors of Campus, Cleveland, and Maryland for those seeking a faster route to the 163 freeway.
>
> During my time here at Birney, I have experienced several 'near misses' and two direct traffic hits involving either children or the parents of children on both Meade and Campus as well as Mead and Park. According to the National Center for Safe Routes to Schools, "More children are hit by cars near school than at any other location." I therefore strongly encourage you to eliminate the Community Commercial (0-109 du/ac) land use designation for this site and restore the Community Commercial (0-29 du/ac) land use designation proposed in the January 2016 version of the North Park Land Use Element."

C11-6 This comment references comments provided by the principal of Birney Elementary School and states that increased density near the school will result in safety risks to the students. The City does not agree that adding density would necessarily result in increased safety risks. While, the proposed North Park CPU assigns density to land, it does not propose any development at this time; thus, the PEIR does not include an analysis of site specific safety concerns in proximity to school sites. However, at such a time that future development is proposed, site specific transportation analysis would be required including the adequacy and safety of pedestrian and bicycle access. The comment does not raise an issue with regard to the adequacy of the PEIR, thus a more detailed response is not provided.

C11-7 Furthermore, in its letter to Lara Gates dated March 21, 2016, the UHCDC requested that the City:

- Eliminate the Community Commercial (0-109 du/ac) land use designation for the site located at 4353 Park Blvd., and restore the Community Commercial (0-29 du/ac) land use designation as proposed in the January 2016 version of the North Park Land Use Element.
- Eliminate the new Density Bonus Plan (allowing up to 73 du/ac) for the residential area between Howard and Lincoln and maintain the base land use designation as Residential-Medium High (30-44 du/ac).
- Change the land use designation along Georgia Street and Howard Avenue from Residential-Very High (55-73 du/ac) to Residential-Medium High (30-44 du/ac).
- Maintain a 35-foot height limit in all residential areas.

C11-7 These comments are noted and will be provided to the decision maker for consideration. The comment does not raise an issue with regard to the adequacy of the PEIR, thus a more detailed response is not provided.

C11-8 This record of opposition to key aspects of the NPCPU should have been noted in Section S.3.

C11-8 Section S.3 Areas of Controversy has been updated to acknowledge the concerns notes by the commenter.

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COMMENTS ON CHAPTER 4: HISTORY OF PROJECT CHANGES RELATED TO CEQA

C11-9

Section 4.3: Changes Based on Comments on the Draft Community Plans

In Section 4.3 on page 4-2, the PEIR states, "The recommended density changes have been supported by the community group, incorporated into the proposed North Park CPU, and analyzed in this PEIR." This statement does not reflect a "good-faith effort at full disclosure" required by CEQA Guidelines Section 15003(i). Section 4.3 should disclose that multiple stakeholder organizations and residents have repeatedly opposed aspects of increased density in the CPU.

Specifically, as commented on Section S.3 above, the University Heights Community Development Corporation, University Heights Historical Society, University Heights Community Association, and Birney School Principal have written multiple letters objecting to the proposed density for the site at 4353 Park Blvd., and opposing the density bonus proposed for the Pedestrian-Oriented Infill Development Enhancement Program area.

COMMENTS ON CHAPTER 6: ENVIRONMENTAL ANALYSIS-NORTH PARK

C11-10

Section 6.1: Land Use

Section 6.1.3 *Impact Analysis* does not provide a "plan-to-ground" analysis as stated on page 1-5 of the PEIR. The goals and recommendations of the NPCPU are concluded on page 6.1-5 of the PEIR to be "consistent with development design guidelines, other mobility and civic guidelines, and programs in accordance with the general goals stated in the General Plan" without any supporting documentation or analysis.

Consistency with the General Plan policies in Section 6.1.3.a *City of San Diego General Plan* should include detailed analysis of issues related to General Plan policies listed in Section 5.1.1.1 on page 5-4, including that planned density of residential land uses is not completely within appropriate locations. As examples, an analysis will reveal the following:

- The NPCPU is not consistent with the third listed goal for "Community plans that maintain or increase planned density of residential land uses in appropriate locations" because multiple stakeholders have repeatedly informed the City during the planning process that the site at 4353 Park Blvd. is an inappropriate location for density up to 109 du/ac, and that Pedestrian-Oriented Infill Development Enhancement Program Area is an inappropriate location for density bonuses allowing up to 73 du/ac.
- The NPCPU is not consistent with Project Objective 2 on page 3-3, which states, "Maintain or increase the housing supply through the designation of higher residential densities focusing along major transit corridors." Neither the site at 4353 Park Blvd., or

C11-9 Section 4.3 has been updated to acknowledge that though stakeholder opposition was received, not all comments and concerns could be addressed. Additionally, the proposed North Park CPU has undergone numerous revisions and it is not clear from the comment whether the referenced comments were provided on the current version of the proposed CPU or a prior version.

C11-10 The City does not agree that the Draft PEIR does not provide a "plan-to-ground" analysis. The commenter suggests that the PEIR makes a conclusion about consistency with the General Plan without any supporting documentation or analysis. However, following Table 6-12, there are several pages of discussion of each element of the proposed North Park CPU with discussion regarding how the relevant element and proposed policies are consistent with the General Plan. Regarding a plan-to-ground analysis, the threshold for this issue area requires an evaluation of consistency with the applicable plans in order to identify if any indirect or secondary environmental impacts could occur. Since the proposed North Park CPU was shown to be consistent with the General Plan, no physical environmental impacts would result related to inconsistency with the General Plan.

The remainder of this comment makes several assertions regarding inconsistency of the North Park CPU with its stated project objectives; however, the City does not agree with these conclusions. The information provided is largely based on the opinions of the commenter about the appropriateness of the proposed Plan and do not raise issues with regard to the adequacy of the Draft PEIR. Additionally, some of the assertions by the commenter are not correct. Specifically, 4353 Park Boulevard is located along Park Boulevard which has access to frequent transit (bus) and the Pedestrian Oriented Infill Development Enhancement Program is located within the area between Lincoln Avenue and Howard Avenue which is in walking distance to the major transportation corridors along El Cajon Boulevard and University Avenue. In addition, the comment incorrectly indicates that the North Park CPU does not provide development transitions between development along Park Boulevard, El Cajon Boulevard, and Adams Avenue, in relation to adjacent lower density development; however, the North Park CPU includes development transition guidelines and policies that address design relationships between higher scale development along the mentioned roads and adjacent lower

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the Pedestrian-Oriented Infill Development Enhancement Program area is focused along a major transit corridor such as University Avenue or El Cajon Boulevard.

- The NPCPU is also not consistent with Project Objective 4 on page 3-3, which states "Preserve the neighborhood character and design relationships between neighborhoods within each community through the development of transitions and design policies." The significant density proposed for the site at 4353 Park Blvd. (109 du/ac) provides no transition between the significant density proposed for El Cajon Blvd. (109 du/ac) and the medium commercial density (29 du/ac) or low-medium residential density just north of the site (10-15 du/ac) to Adams Avenue.

- The NPCPU is not consistent with its own policies, including LU-3.4 listed on Table 6.1-1 on page 6.1-5, which states "LU-3.4 Focus the highest intensity development (residential and non-residential) on both El Cajon Boulevard and University Avenue around the transit stops to capitalize on access to transit, boost transit ridership, and reduce reliance on driving." Neither the site at 4353 Park Blvd., or the Pedestrian-Oriented Infill Development Enhancement Program area is focused along a major transit corridor such as University Avenue or El Cajon Boulevard.

C11-11

Section 6.3: Transportation and Circulation

In Section 6.3 *Transportation and Circulation*, on page 6.3-21, the PEIR defines the thresholds used to evaluate potential impacts related to Transportation and Traffic as based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). The PEIR evaluated if implementation of a proposed CPU would:

1) Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps;

2) Conflict with adopted policies, plans, or programs supporting alternative transportation.

However, CEQA Guidelines Appendix *G Environmental Checklist Form* includes another question under topic XVI. Transportation/Traffic that would be relevant to evaluate: Would the project f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Considering the excessive density proposed for the site located at 4353 Park Blvd., directly across from Birney Elementary School, the potential safety risks to elementary school students by the addition of up to 400 to 500 dwelling units directly across the street should have been addressed in this section of the PEIR. As pointed out by Principal Amanda Hammond-Williams in her email to Lara Gates dated March 25, 2016, "Such excessive density not only poses traffic

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C11-10 (cont.)

scale development (refer to Section 4.3 of the CPU, in particular development transition areas discussion and policies UD-3.39 through UD-3.41, and Figure 4-10). As specific issues with regard to the Draft PEIR were not identified, a more detailed response cannot be provided.

C11-11 As stated in Section 6.3.2, Significance Determination Thresholds, the thresholds used to evaluate potential impacts to Transportation and Traffic were based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds, which were modified to reflect the programmatic analysis necessary. The second question used in the analysis to analyze potential conflicts with adopted policies, plans, or programs supporting alternative transportation would satisfy question f) of the CEQA Guidelines Appendix G, as "alternative transportation" refers to transit, bicycle, and pedestrian transportation facilities. As discussed in Section 6.3.3, Impact Analysis, under Issue 2 Alternative Transportation, the proposed North Park CPU would not conflict with applicable alternative transportation (e.g., transit, bicycle, and pedestrian) plans, policies, or programs. These adopted plans, policies, or programs include safety considerations that the proposed North Park CPU must be consistent with. Policies included in the Mobility Element of the proposed North Park CPU provide for increased safety of pedestrian and bicycle routes through enhanced facilities. Specifically, see Policies ME-1.1, ME-1.3, ME-1.4, ME-1.7, ME-1.12, ME-1.16, and ME-1.17. See also response to comment C11-6.

The comment also suggests that the statement, "Policies in the proposed plan support coordination with SANDAG…" lacks supporting information. However, the statement referred to policies included in the proposed North Park CPU. Specifically, Policies ME-1.15, ME-2.5, ME-2.6, ME-2.7, and ME-3.5 require coordination with SANDAG on bicycle, transit, and other transportation facilities. In addition, the policies stated in the previous paragraph in this response include pedestrian and bicycle facility enhancements that would increase safety.

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safety risks for school children walking or biking on Meade Avenue to cross Park Blvd., but for any school child walking or biking near the school."

With the significant increases in density proposed for the site at 4353 Park Blvd., the Pedestrian-Oriented Infill Development Enhancement Program area, the Transit-Oriented Development Enhancement Program Area, and other areas throughout North Park, Section 6.3.1.6 *Alternative Transportation Facilities,* starting on page 6.3-17 does not adequately address pedestrian or bicycle safety.

The discussion of Bicycle Facilities on page 6.3-42 does not provide any analysis to support the conclusion that "Policies in the proposed plan support coordination with SANDAG on the planning and implementation of regional bicycle facilities, support increased bicycle comfort and safety, and bike sharing." In particular, there is no information provide how the NPCPU would increase bicycle safety. Likewise, the discussion of Pedestrian Facilities on the same page includes no information at all about how the NPCPU will increase pedestrian safety.

CLOSING

C11-12 As thoroughly documented by the North Park Historical Society, the draft PEIR contains multiple errors and omissions and does not adequately document significant impacts in order for the City Council to make a "decision which intelligently takes account of environmental consequences," in accordance with the spirit and the letter of California environmental law.

In view of the significant impacts not documented in the PEIR, the Pedestrian-Oriented Infill Development Enhancement Program should be eliminated from the NPCPU and the zoning decreased for the site at 4353 Park Blvd. to Community Commercial (0-29 du/ac).

Otherwise, the Draft PEIR should be substantially revised to include all of the analyses discussed in the NPHS comment letter and in my comment letter and re-circulated for another 45-day public review period.

Sincerely,

Kristin Harms

Kristin Harms

Distribution:
North Park Historical Society
North Park Planning Committee
Councilmember Todd Gloria
University Heights Community Association
University Heights Development Corporation
University Heights Historical Society
Chris Ward
Amanda Hammond-Williams, Birney School
Lara Gates, City of San Diego

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C11-12 See above responses to the specific issues raised in this comment letter. The City does not agree that the Draft PEIR was insufficient nor that is requires substantial revision that would necessitate a recirculation. However, all comments will be considered during the decision-making process.

Letter C12

From: charleskaminski23@gmail.com
Sent: Wednesday, July 27, 2016 10:57 PM
To: Steinert, Kurtis
Subject: Fwd: Draft PEIR -- North Park and Golden Hill Community Plan Updates, Public Notice Date May 31, 2016

Sent from my iPhone

Begin forwarded message:

From: charleskaminski23@gmail.com
Date: July 27, 2016 at 10:54:02 PM PDT
To: David Swarens <loscalifornios@aol.com>
Cc: dkane002@san.rr.com, Kelley Stanco <KStanco@sandiego.gov>, Sean Morales <sean@gpaconsulting-us.com>, Jonathan Kaplan <jonathan@gpaconsulting-us.com>, vdgwrl@cox.net, hb3@me.com, Shannon Anthony <santhony@sandiego.gov>
Subject: Re: Draft PEIR -- North Park and Golden Hill Community Plan Updates, Public Notice Date May 31, 2016

C12-1 LGBTQ sites include the first LGBT center at 2250 B Street. Note that it is historic but NOT for the LGBTQ context. 1447 3Oth was another location for the Center. Has this been identified?. The Big Kitchen is a location. The MCC church was located in the neighborhood. The richness of these places and other spaces in apartments and in the shadows are important. Has the city planner reviewed the plans with the city consultant for the LGBTQ historic context or visited Lambda Archives for LGBTQ history?
Chuck Kaminski

Sent from my iPhone

On Jul 27, 2016, at 7:22 PM, David Swarens <loscalifornios@aol.com> wrote:

> Contrary to the cover sheet, and e mail message, July 28th is the close of the comment period.
>
> Yours,
> David Swarens.
>
> -----Original Message-----
> From: goldenhillplanning <goldenhillplanning@sbcglobal.net>
> To: Loscalifornios Info <info@loscalifornios.com>
> Sent: Wed, Jul 27, 2016 7:18 pm
> Subject: Fw: Draft PEIR -- North Park and Golden Hill Community Plan Updates, Public Notice Date May 31, 2016
>
> On Tuesday, May 31, 2016 11:58 AM, "Steinert, Kurtis" <KSteinert@sandiego.gov> wrote:

C12-1 This comment recommends several locations as having historic context related to the LGBTQ community. The Metropolitan Community Church was identified in Historical Resources Survey (Appendix G-2); however, 1447 30th Street and the Big Kitchen were not identified in the survey report. See Section 2.0 Methods of Appendix G-2 for specific methodology for the historical resources survey report. The San Diego LGBTQ Context Statement commenced in October 2015, long after the completion of the Golden Hill and North Park Context Statements and Surveys, and will not be finalized until September 30, 2016. The San Diego LGBTQ Historic Context Statement will identify the themes significant to the LGBTQ community throughout San Diego – including North Park and Golden Hill – as well as the property types that convey those themes in an important way. Once finalized, the San Diego LGBTQ Historic Context Statement will be used to assist in the identification of potential individually significant resources, both through historic designation nominations and potential historic resource reviews associated with permit applications. In addition, per Policy HP-2.5 of both proposed CPUs, the City must work with the community to identify and evaluate additional properties that possess historic significance for social or cultural resources for potential historic designation. Historic status of properties that meet the designation criteria may be established through a designation vote of the City's Historic Resources Board following submittal of a Historical Resource Research Report.

DRAFT PEIR

Please see the attached Draft Program Environmental Impact Report for the North Park and Golden Hill Community Plan Updates that was distributed for public review, starting today, May 31, and ending July 14, 2016.

Kurtis Steinert, AICP
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<Public Notice_ DPEIR_North Park_Golden_Hill_CPUs.pdf>

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Letter C13

LAMBDA ARCHIVES SAN DIEGO

July 28, 2016

Kurtis Steinert, AICP
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San Diego, CA 92101

RE: North Park & Golden Hill Community Plans Updates
Project No. 380611/Draft PEIR
6.7 North Park Historical Resources
7.7 Golden Hill Historical Resources
Appendix G-2 North Park Historic Resources Survey
Appendix M-2 Golden Hill Historic Resources Survey

Mr. Steinert and Planning Department,

C13-1 The City of San Diego last year commissioned a consultant to provide an LGBTQ Historic Context Report through Historical Resources to identify the themes of the LGBTQ community in San Diego.

C13-2 As the update for the North Park/Golden Hill Community Plans are underway and in response to the PIER, I offer the following:

Both planning area sections on Historical Resources make no mention of the LGBTQ community that was an important participant in the social and political development of the two neighborhoods during the 1960s thru the 1980s and beyond. This is an oversight and should be address in the PEIR.

C13-3 When the Bernie Michels-Thom Carey House at Florida and El Cajon Blvd in North Park was lost to demolition, many in the community felt the loss of an early space of political activism that led to the formation of The Center for Social Services which soon found a home at 2250 B Street. From there the Center moved to 1447 30th Street. Spread among both neighborhoods, the LGBTQ community lived, worked and socialized.

C13-4 Faith planned a role as well in our community. The Metropolitan Community Church in San Diego is the second oldest in the nation and was founded in 1970. In the 1980s, the church found a home on 30th Street in North Park.

www.lambdaarchives.org Tax ID # 33-0402620
4545 Park Blvd., San Diego, CA 92116
619-260-1522

C13-1 Comment noted. This comment is not related to the adequacy of the Draft PEIR.

C13-2 Comment noted. This comment is not related to the adequacy of the Draft PEIR. The following response is provided for informational purposes. The Historic Context Statements and Surveys completed for the North Park and Golden Hill CPUs (Appendices G-2 and M-2) were largely complete prior to the commencement of the citywide San Diego LGBTQ Historic Context Statement in October 2015. Additionally, the San Diego LGBTQ Context Statement is still in draft form, and will not be finalized until September 30, 2016. The San Diego LGBTQ Historic Context Statement will identify the themes significant to the LGBTQ community throughout San Diego – including North Park and Golden Hill – as well as the property types that convey those themes in an important way. Once finalized, the San Diego LGBTQ Historic Context Statement will be used to assist in the identification of potential individually significant resources, both through historic designation nominations and potential historic resource reviews associated with permit applications. In addition, per Policy HP-2.5 of both proposed CPUs, the City must work with the community to identify and evaluate additional properties that possess historic significance for social or cultural resources for potential historic designation. Historic status of properties that meet the designation criteria may be established through a designation vote of the City's Historic Resources Board following submittal of a Historical Resource Research Report.

C13-3 Comment noted. This comment is not related to the adequacy of the Draft PEIR.

C13-4 Comment noted. This comment is not related to the adequacy of the Draft PEIR. Note that the Metropolitan Community Church is identified in the Historical Resources Survey Report (Appendix G-2) as 4333 30th Street, Chua Phat Da (formerly Metropolitan Community Church).



C13-5 The Diversionary Theater and Lambda Archives on Park Blvd in University Heights represents the cultural side of our community. Bars in North Park and Golden Hill were often the only places the community could meet and feel safe.

C13-6 These two communities, as well as nearby neighborhoods, were rich in women and feminist spaces as well as LGBTQ spaces. The Wing Café, Las Hermanas Womens Cultural Center and Coffeehouse, and the Center for Womens Studies and Services became ground center for women in the 70s and 80s.

C13-7 As you can see both North Park and Golden Hill have a rich history for women and the LGBTQ community. The two sections on Historical Resources need to fill the gap in the PEIR and identify these communities in their narrative.

C13-8 Lambda Archives, of which I am a Board Member, is a rich depository of material on our LGBTQ community and is available for historical researchers to examine the happenings and places in both North Park and Golden Hill.

Charles Kaminski
Lambda Archives

www.lambdaarchives.org Tax ID # 33-0402620
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619-260-1522

C13-5 Comment noted. This comment is not related to the adequacy of the Draft PEIR.

C13-6 Comment noted. This comment is not related to the adequacy of the Draft PEIR.

C13-7 See response to comment C13-2.

C13-8 Comment noted. This comment is not related to the adequacy of the Draft PEIR. The City appreciates the information provided by the commenter.

Letter C14

To
Kurtis Steinert, AICP
Senior Planner, Environmental and Policy Analysis
City of San Diego
Planning Department
1010 Second Ave, Ste 1200 , MS 413, San Diego, CA 92101

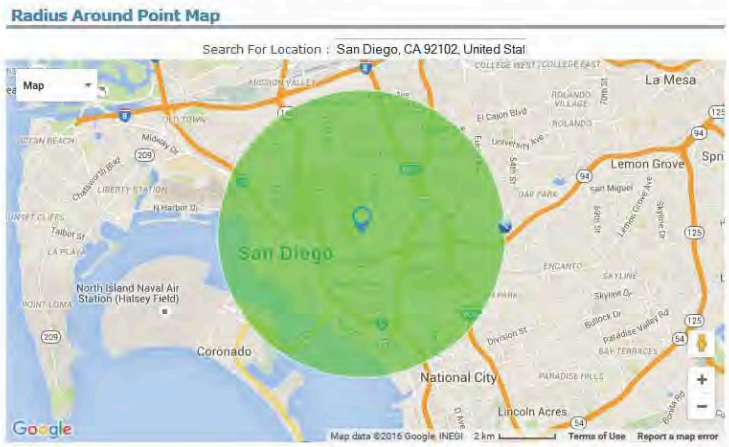
Mr. Steinert,

C14-1 Thank you for the opportunity to provide feedback regarding the Draft Program Environmental Impact Report for the North Park and Golden Hill Community Plan Updates. Included are my concerns regarding the Greater Golden Hill portion.

Sincerely,
Melissa Serocki

C14-2 FIGURES 7.1.1 "Land Uses under Adopted Community Plan – Golden Hill" & 7.1-2 "Commercial Districts – Golden Hill"
3045 Hawthorn St. appears to be designated as commercial, but it is a Single Family Residence and is currently zoned "GHPD-GH-3000" and should remain "low medium" residential.

C14-3 Regarding community plan goals and commercial designations: If goals of the commercial districts are to serve the Greater Golden Hill residents, a designation of "Neighborhood Commercial" would be more compatible as a 3 mile radius extends far beyond the community. Below is an image of a 3 mile radius around Greater Golden Hill highlighted.



C14-1 This introductory comment is noted.

C14-2 This comment does not raise an issue with regard to the adequacy of the Draft PEIR; however, the following response is provided for informational purposes. The referenced property is designated for commercial use yet zoned residential by the adopted 1988 Golden Hill Community Plan and zoning program. The property is located within the Fern Street Commercial District similarly identified in the proposed Golden Hill CPU (see Figure 2-2) as Community Commercial which allows residential density of 0-29 dwelling units per acre as part of a mixed-use development. The proposed CPU does not include a change to the existing adopted commercial land use, which provides flexibility for potential future commercial uses within this commercial district, while allowing the continued residential use.

C14-3 Comment noted. This comment does not raise an issue with regard to the adequacy of the Draft PEIR.

LETTER		RESPONSE	
C14-4	FIGURE 7.2-1 "Block Patterns – Golden Hill" The following blocks should be identified as "Canyon Blocks" as they dead-end, have irregular lot sizes and lines, or are cul-de-sacs due to "Juniper Canyon": Ivy, Hawthorn, and the alley between them between 31st and 32nd Streets	C14-4	This comment does not raise an issue with regard to the adequacy of the Draft PEIR; however, the following response is provided for informational purposes. The referenced figure is provided for context and is not the basis for proposed policies; thus no revision is warranted.
C14-5	Page 7.3-3 30th Street "Angle parking is available on the west side of the street between… Grape Street and Hawthorn" should be corrected to "Grape Street and Juniper Street" and the section of road should also be classified as a 2-lane collector in FIGURE 7.3-1 "Existing Functional Street Classifications – Golden Hill". In the same figure, 31st Street between Grape Street and Cedar Street should be shown as a 1-lane collector (one-way Southbound)	C14-5	This comment does not raise an issue with regard to the adequacy of the Draft PEIR; however, the following response is provided for informational purposes. The description of 30th Street on page 7.3-3 of the proposed CPU has been modified.
C14-6	Page 7.3-7 There is no mention of the poor traffic conditions at the intersection of 30th Street and C Street. During the morning peak travel time, it is not uncommon for Southbound traffic on 30th Street not be able to proceed through a green signal at C Street because "arrival rates exceed the capacity of the intersection".	C14-6	The intersection of 30th Street and C Street did not meet the criteria for inclusion in the study area. Factors used to determine study intersections are listed in Section 2.1 of the Traffic Impact Study (Appendix B). Section 7.3.1.2 of the PEIR identifies the segment of 30th Street between A Street and Broadway as currently operating at a Level of Service (LOS) F. This segment includes the intersection of 30th and C Street. The Draft PEIR also identifies that the proposed CPU would result in a cumulative impact to this roadway segment (Impact 7.3-9).
C14-7	FIGURE 7.3-6 "Build-out Proposed Land Use Roadway Segment ADT Volumes – Golden Hill" 30th Street between Grape Street and Juniper Street is not included even though it is a higher traveled section of road, a commercial district, and is part of the bus route	C14-7	30th Street between Grape Street and Juniper Street is not a classified roadway and, therefore, is not included in the study area. Traffic along 30th Street flows directly onto Fern Street accessing the various commercial uses along this segment, making Fern Street the primary travel route between Grape Street and Juniper Street.
C14-8	Table 7.3-8 30th Street Should include Juniper St to Ash St, instead of Grape St to Ash St	C14-8	Refer to response to comment C14-7.
C14-9	FIGURE 7.6-2 and 7.6-3 & Tables 7.6-2 and 7.6.3 Again, 30th Street between Grape Street & Juniper Street are not included even though it is a commercial district and bus route (and part of the "Potential Streetcar Line").	C14-9	Refer to response to comments C14-7 and C14-8.

Letter C15

From: PJ Sevier <pjs05@sbcglobal.net>
Sent: Thursday, July 14, 2016 3:19 PM
To: PLN_PlanningCEQA
Subject: re: University Heights high density plan

C15-1 As an almost 30 year-proud owner of a Craftsman home in University Heights, now in the sights of North Park Planning/San Diego City's HIGH DENSITY "plot", I am appealing to you for help to stop this! I am an EXTREMELY CONCERNED homeowner and we have been encouraged to write in hopes you might help us as no others have!

C15-2 The following text is being copied from a letter I wrote in February to Mr Todd Gloria, Mr Chris Ward and a Mr Horan. I never did receive a reply from any of them, but I am hopeful this time, someone might read my letter and be supportive.

C15-3 I attended the North Park Planning Meeting held on February 17, 2016, publicized to address the "University Heights High Density Proposal". This was my first witness to the present Board and I was utterly dismayed (and disgusted) by their, seemingly, distain to the many homeowners in attendance. We were there in numbers, but right from the beginning, the president ("Vicky" with the lower case intended) told us that each person who wished to speak had to be on her list of speakers and would be given ONE MINUTE to state their case. In this minute, one had to say their name (often asked to repeat it) and their home address ---leaving that speaker no time for any kind of dialog. Almost every homeowner was cut off mid opening statements leaving next to no time for a sentiment to be stated. We felt truly unfairly treated!!!

C15-4 "Vicky" (NOT impressed with her AT ALL) had introduced herself to me directly when I was signing in, as I was asking some questions. In our brief encounter, she stated that she lived in BURLINGAME ,as did "many" of her colleagues on the panel!!! No wonder they could care less about what happens here in the area they are claiming to represent!!!! At one point, a different member of the panel BERATED us, in a disgusted tone, for "CHOOSING TO LIVE IN "THAT" PART OF THE CITY"!!! Twenty-eight years ago to this present day, I CHOSE to live here due to the charm of this part of the city for the very same bungalows and Craftsman homes they are intent on negatively impacting!

C15-5 The representative for the City, Lara Gates (possibly another resident of Burlingame) told us "none of the100 yr old homes would be destroyed", as in torn down, but if the High Density Plan goes through in our historic neighborhoods, they will do permanent damage! The new builders buying properties next door to our bungalow or Craftsman home, "Destroy" it would! Present views, light/shade, increased activities/noise created by multitude neighbors on one lot would definitely negatively impact on a constant basis, any form of peace we presently enjoy!!! Not to mention the quality of the neighborhood!!!! The current single lane streets will not be able to handle the increase in cars, Ms Gates' new bus lines, including foot traffic going to the

C15-6 restaurants/shops on the bottom floors of these multistory complexes!! In my mind, this is akin to tearing down the Western Metal Building at Petco and putting in a 5 story, 24 hour Target, with bus service, in its place!! Ms Gates and I met again at one of her "coffees" at the Lafayette Hotel, on a

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C15-1 Comment noted. The comment does not raise a specific issue with regard to the adequacy of the Draft PEIR.

C15-2 The comment is noted.

C15-3 Comment noted, the comment is not related to the adequacy of the Draft PEIR; thus, a detailed response is not required under CEQA.

C15-4 Comment noted. The comment is not related to the adequacy of the Draft PEIR; thus, a detailed response is not required under CEQA.

C15-5 The comment expresses concern about damage to historic neighborhoods resulting from the Plan. Potential impacts to historic resources are addressed in Sections 6.7 (North Park) and 7.7 (Golden Hill) of the Draft PEIR. The analysis in these sections concludes that impacts to historical resources would be significant and unavoidable Impacts related to views and lighting are addressed in Section 6.2 (North Park) and 7.2 (Golden Hill) of the PEIR and noise impacts are addressed in Sections 6.6 (North Park) and 7.6 (Golden Hill) of the Draft PEIR. The PEIR found impacts related to views and lighting would be less than significant and noise impacts (ambient noise, traffic noise, and construction-vibration) would be significant and unavoidable. Regarding impacts to streets, the Draft PEIR traffic analysis in Sections 6.3 (North Park) and 7.3 (Golden Hill) found significant and unavoidable impacts to several street segments within the CPU areas would occur. Since the comment does not raise a specific issue with regard to any of these impacts disclosed in the Draft PEIR, a more detailed response cannot be provided.

C15-6 The comment is not related to the adequacy of the Draft PEIR; thus, a detailed response is not required under CEQA.

weekday/workday for most homeowners. Yet again, it was very obvious that her mind was made up that her plan is going to happen. She "listened"/let us speak, but again, we were talking to deaf ears. I felt I had, once again, wasted my time in attending a meeting to seek support.

C15-7 I hope this time, the concerned (and scared) homeowners in the area south of El Cajon Blvd, north of University Avenue, west of Texas Street and east of Park Blvd can get some HELPFUL support!!!

Thank you,

Paula Sevier (4206 Florida Street, 92104)

C15-7 The comment is not related to the adequacy of the Draft PEIR; thus, a detailed response is not required under CEQA.

Letter C16

From: Ethel Sims <simset1@cox.net>
Sent: Wednesday, July 13, 2016 3:53 PM
To: Steinert, Kurtis
Cc: Turgeon, Bernard; 'Thomas Simms'
Subject: SIMS Alternative EIR Community Plan Golden Hill Land Use
Attachments: Alternative Density Request EIR Community Plan Golden Hill Community Plan.pdf

C16-1

Hello Kurtis,
We discussed the PEIR for the North Park and Golden Hill's review. I have attached some comments
For the EIR that pertains to Land Use for the Community Plan for Golden Hill. I am not concerned about environemental issues but focusing on the opportunity for alternative MAP GRID 15 to be changed from GH-1500 at certain boundaries along
The 30th Street Corridor with implications addressed in the City of Village Concept for TOD and related logistics for like properties,

Please advise upon receipt and feel free to contact me for any reason.

Thank you!

Ethel Sims (619) 871-5585; simset1@cox.net
REAM TEAM BROKER SERVICES
Real Estate Ambassador & Partners
SOW with SIMS – REAP Home BLESSSINGS

C16-1 The first part of this comment is not directed at the content of the Draft PEIR, rather is a question regarding the proposed Plan that does not require a specific response under CEQA. The second part of this comment is introductory in nature and does not require a response under CEQA.

PROJECT 380611Z EIR COMMUNITY PLAN GOLDEN HILL 30TH STREET CORRIDOR LAND USE

July 13, 2016

PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT No. 380611 / SCH No. 2013121076
COMMUNITY AREA: North Park and Golden Hill
COUNCIL DISTRICT: 3

OWNER: APPLICANT: Thomas L. Sims 1144 30TH STREET SAN DIEGO, CA 92102 APN 539-531-29-00
REQUEST FOR Alternative Consideration to EIR GOLDEN HILL COMMUNITY PLAN

Golden Hill Community Plan Update – Response to the PEIR July 1, 2016
The Golden Hill Community Plan area is an urbanized community consisting of approximately 750 acres. It is located in the central portion of the City of San Diego. Golden Hill abuts the community planning areas of Downtown San Diego on the west, City Heights on the east, North Park on the north, Southeastern San Diego on the south, and Balboa Park on the west and north. The majority of Golden Hill is gently sloping with pronounced hillside areas located in the eastern boundary of the community adjacent to City Heights and North Park.
BACKGROUND

C16-2 The subject discussion uses an example optimistic appeal to the project site currently located between the A Street to Broadway Boundaries along the South 30th Street Corridor n the Golden Hill Community's Map - Grid 15.

The Community Land Use Goals for the June 2016 Community Plan, specific to Golden Hill, consists of the following excerpts to *present the cause for this request for alternative, increased density for the 30th Street Corridor.*

The requested, suggested alternative density of RM 3-7 or RM 3-8 aligns with housing improvement and community development opportunities desired by a much-needed improved, esthetic and infrastructure revitalization that is futuristic and appropriate for the trending market conditions.

C16-3 The 30th Street Corridor sits in the midst of the desired improvement zone, the future Transit Development Orientation for The City of Villages concepts. The area also is an example that is being reviewed by Reinvestment Improvement Act – Tax Force 2011-13 to advocate for affordable housing and economic development programs on behalf of those not adequately served. The area is comprised of disenfranchised opportunities that could benefit from eligible City Funding as a supplemental resource for improving the infrastructure. As stakeholder advocates, the applicant proposes that attention be given to the need for neighboring changes that will appeal to consistent and equal opportunities for existing property owners. An alternative to the EIR Community Plan in the form of RM 3-7 or RM 3-8 will not only increase potential value for their investment as neighbors, citizens and vital stakeholder-developers; but will provide accessibility and equality to make a difference in the community without competing with the rising costs of property improvements. The need to enhance the community façade and give the 30th Street Corridor a more, welcoming and neighborly approach to the City of Villages' concept can be demonstrative of the change as a viable, win-win alternative the EIR-Community Plan for Greater Golden Hill.

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Prepared by Ethel E. Sims – Real Estate Ambassador & Partners – CABRE# 0932098
Contact INFORMATION – SIMSET1@COX.NET; 619-871-5585

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C16-2 This comment is noted. This comment does not raise an issue with regard to the adequacy of the Draft PEIR; thus, no response required under CEQA.

C16-3 The commenter's statements are primarily comments on the proposed Golden Hill CPU and not the Draft PEIR. The comments present an opinion about a possible alternative for increased density along the 30th Street corridor from A Street to Broadway, specifically with density of RM 3-7 or RM 3-8. The Higher Density Alternative for Golden Hill provided in Section 12.2 of the Draft PEIR provides for higher density along this segment from C Street to Broadway. As discussed in the Draft PEIR analysis for this alternative, the Higher Density Alternative would result in greater impacts related to transportation and air quality and public services and facilities. The Draft PEIR includes a reasonable range of alternatives in compliance with the CEQA Guidelines and an additional alternative is not required.

PROJECT 3806112 EIR COMMUNITY PLAN GOLDEN HILL 30TH STREET CORRIDOR LAND USE

C16-4 Although, this request for alternative density along the subject 30th Street Corridor is not designed to mirror the entire concept for 25th Street, it will mirror a somewhat interest and greater priority already given to the West side of the community. The same type of sentiment and motivation that has resulted from the Golden Hill- City of SD Renovation of 25th Street is desirable and deserves similar priority and investment funds for the 30th Street Corridor:

"I believe this project shows the City's commitment to Golden Hill"

"And we as property owners should also be behind Golden Hill to improve our properties and make this a very pedestrian friendly and easily accessible full-time use neighborhood with shops, restaurants and other types of businesses."

Hence, we propose equal investment in the disenfranchised area of the 30th Street Corridor be given attention by the City of San Diego in part as they make plans to (reinvest) and incur necessary infrastructure costs associated with curb and sidewalk that will immediately complements the existing Transit Oriented Development features discussed in the future City of Villages concept. Curbside improvement costs to the infrastructure should also be born by the City of San Diego to demonstrate consistently fair assessment and investment to the 30th Street Corridor without imposing financial burdens to existing residential homeowners and community stakeholders in the neighborhood.

This City Infrastructure commitment along with an alternative EIR Community Plan for RM 3-7 or RM 3-8 would give incentives to existing owners and neighbors to participate in urban and family development in the form mixed-use residential and light commercial amenities.

The proposed alternative to mixed family-friendly, housing that allows integrating economic feasible, light commercial use that could potentially include enhances the affordability of liveable and sizeable homes that compliment a variety of residents, homeowners and city dwellers - without excluding various types of livable spaces that offer personal services in a community that could benefit like the areas supported by Commercial at the Northward end of 30th Street for SouthPark and NorthPark neighboring sites, businesses and service providers.

Change is evident and trending in the Greater Golden Hill community like that of the other areas of Metropolitan San Diego. There is a market trend and philosophy of Place-Making and Middle Housing concepts that could enhance and further compliment the future EIR – Community Plan's concept for City of Villages along the **somewhat, neglected and underserved** 30th Street Corridor - South.

If the RM 3-7 or RM 3-8 land use increase for this significant gateway at 30th Street South considers the multiple, mutual benefits and mixed housing variety like that of the City of Villages concept, then property owners like the applicant can better plan to be advocates and partakers of scalable, affordable housing enhancements to the neighborhood.

Those who desire Urban Living but also seeks a variety of housing options with nearby amenities becoming attractive to suburban developments can find ease to transportation between the aligning Downtown, North Park, Mission Valley and Southeastern communities while engaging in small, personable and desirable features.

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C16-4 Refer to response to comment C16-3 for a response regarding the 30th Street south corridor. The comments regarding infrastructure improvements and funding are not related to the adequacy of the Draft PEIR. At a program level of analysis, the Draft PEIR does not evaluate specific infrastructure improvements. Although the proposed IFS would allow for funding of infrastructure within the Golden Hill CPU, specific funding plans for improvements such as curbside improvement costs are not addressed in the Draft PEIR. Funding for future improvements associated with development would be evaluated and determined on a project by project basis.

PROJECT 3806112 EIR COMMUNITY PLAN GOLDEN HILL 30TH STREET CORRIDOR LAND USE

C16-5 The Community Plan features that promote the needed revision and feasibility in land use that consists of the following excerpts from the June 2016 Golden Hill Community Plan

- A variety of housing types for all age, income, and social groups.
- Historic character and scale of single-family and lower density residential neighborhoods retained.
- Multifamily development that enhances its surrounding neighborhood and is sensitive to historic character and scale where present.

One example of a subject property aligning the 30th Street Corridor is personally owned and operated as a church Single Family Residence by the applicant. It contains desirable, urban infill land features that complement the City of Villages concept. It is currently known as 1144 30th Street, San Diego - 92102. It has four existing lots and situated between the south alley and corner of B Street. It would benefit from the proposed alternative revision from its current Planned District – 1500 to accommodate such a prototype of the City of Villages that reflects the same Medium Density but increases the dwelling units with limited commercial uses such as RM 3-7 or RM 3-8.

The project example for this particular location is comprised of 4 continuous lots at the 1144 30th Street features 14,200 sf; which is quite sizeable in comparison to other original lots (merged into one) along the Corridor. It boasts .32 of an acre. It abuts to the alley at the South and sits at the corner of B Street where housing development is also underway.

The alternative to the current RM 2-5 medium density could compliment the need for ***both revitalization and economic upgrades*** for the community to allow a small commercial mixed use property upgrade at the suggested RM 3-7 or RM 3-8 density for the EIR-Community Plan for Golden Hill's 30th Street-South Corridor.

"Well-designed 'Missing Middle' buildings unify the walkable streetscape as they greatly diversify the choices available for households of different age, size, and income."

This request for the RM 3-7 or RM 3-8 alternative is not to be confused with the latest Amendment for Affordable Housing Density. Caution is to be taken by arbitrarily expecting the appeal of the community to fit into tradition Affordable Housing Units or For Sale Properties that require San Housing Commission's approval and a certain calculation of economies of scale that hinder a private owner's best use and mutual appeal for the other community residents and potential family dwellers. This Bonus Density is also more appealing to big time development partners whose interest to invest in the community poses competition to current owners and current gentrification that often misplace current residents.

The RM-3-7 or RM 3-8 alternative would increase the potential livable size and varied designs for single family and multi-family dwellers that is both economically and aesthetically, ***currently challenging by the limited FAR of .60***. This EIR Density alternative with consideration given to other existing home owners, community stake-owners, entrepreneurs and longstanding Golden Hill property owners will

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C16-5 Refer to response to comment C16-3.

provide more attractive opportunities to build multi-dwelling units with limited commercial activities It would also allow for flexibility and sensitivity that fosters a variety of urban design projects without forcing the property to integrate several cookie cutter box-designs that may are not favorable for the appealing characteristic styles and enhancement corridor's desired goals.

With the RM 3-7 or RM 3-8 alternative, the small variation in the FAR serves as a realistic approach to a small scale project with a variety of mixed-housing that better appeals to both average working families with children and youth who are vital to the sustainability of surrounding schools, recreation centers and family-centered amenities throughout the city.

The overall community smart growth for Uptown San Diego is trending into revitalization by investors but also needs to appeal to much-needed new development projects along the 30th Street Transit Oriented Corridor. The property is in close proximity to a combination of commercial and residential development dwellings. Over the past two years, the community properties have been upgraded in the form of rental duplexes, bungalows, Condos, Single Family Homes, etc. Current building projects along Broadway and C Street corridors, including areas West of the Existing 30th Street Corridor to include 27th, 28th and 29th Street projects are reflective of increased housing units for the area. Many of these projects consisted of combining and merging adjacent lots to obtain increased square footage.

- Development Review is underway for Project 30th and C St – SDP. This property boasts commercial plus continuous lots of GH-1000 that could positively support the City of Village and Middle Housing concepts.
- 1021 30th Street is a development partnership between two non-dwelling entities being developed using the best, existing density of 600 along Broadway. The property features provide similar characteristics like that of the 30th/B location but lacks the commitment to the community and the existing stakeholder design for local citizens in the area. It may attract new residents which is appealing but it lacks the history, commitment and investment of the community demonstrated by the long-term presence that represents the existing applicant.
- Another example is the property located at 1102 30th Street property that would greatly benefit from a façade face lift and added attraction to the Corridor, with potential improvement and increased housing varieties being given to its limited density for adequate and affordable incentives to revitalize its location on the #0th Street Corridor, too.

C16-6

SUMMARY for ALTERNATIVE EIR – Golden Hill Community Plan

If the entire view of the 30th Street Corridor between A Street and Broadway would be viewed for this discussion, it would reflect the potential and the trending urban design concept of what is known as Middle Housing. See Table 1 and Table 2 along with Exhibit A on page 8 of this document.

If the entire view of the 30th Street Corridor between A Street and Broadway would be viewed for this discussion, it would reflect the potential and the trending urban design concept of what is known as Middle Housing. See Exhibit A Below.

"Property owners often perceive that the value of their asset is confined within their property line boundaries'.

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C16-6 Refer to response to comment C16-3.

If this is true, then the value of the property should be able to support the overall future community revitalization, reinvestment act initiatives and the curbside and Corridor Improvements that can appeal to the increased desire and much-needed overlooked infrastructure consisting of realistic approaches to mixed housing that conveniently, without added cost burdens, zoning permits and laborious process planning reviews.

The recommended solution is increased density of RM 3-8 with cited examples using a base of RM 3-7 as a middle ground approach serves as win-win mutual opportunity for the community, city and residents. Either one of these alternatives are intended to better enhance and mutually support the feasibility of property ownership and realistic land use for the overall well-being and safety of the 30th Street Corridor in the Greater Golden Hill Community, as indicated on the EIR Map GRID 15 that pertains to land use – highest and best that requires changes as indicated and justified below:

Overall Benefit for RM 3-7 or RM 3-8: This alternative is a scalable logic provides for a different yet reasonable and affordable dwelling units. Community, Development and Broader Affordability opportunities for a greater variety of housing that **revitalizes the 30th Corridor and offers the City of San Diego a win-win approach to co-invest, reinvest and improve the future infrastructure** and appeal to local residents and those who frequent and commute along the 30th Street Corridor on a daily basis.

Mutual future Benefit to property owners who offer a neighborhood focus into the existing 30th Commercial at the North would compliment a better appeal and center of pedestrian and ground floor activity for market place, café and personal services.

City of Villages for the future plan of transit on the 30th Corridor presents residents that will also utilize the pedestrian –friendly and character of existing mixed use neighborhood variety of housing.

Change is desirable and beneficial that is not just density focused but it designed to not overload the community with commercial only designations but enhances the 30th Stret Corridor by allowing for economically impact housing and limited commercial uses to support the future Community Plan and City of Villages concepts already underway.

The FAR increases to a realistic formula for family units for 1.38 for 30-44 units per acre that is intended to accommodate a better appeal that is scaleable to the community.

Example 1:

The alternative land use would remedy the restriction of new home development to only 8520 sf based on the current FAR of .60 for the 14,200 subject property example. The FAR at .60 limit would restrict dwelling units to 5-6 for average 2-3 Bedrooms featuring 1600 sf dwelling. This small scale of 6 units is not economically sound with current costs that drive the planning process within the City of San Diego. It is counter-productive and eliminates the potential for providing a variety of dwelling for residents and homeowners. It further hinders the pricing of the units for rent or purchase and drives a wedge between the haves and the have-nots due to socio-economic disparities and characteristics that result in gentrification with negative indicators.

Requested Alternative: The height limitations for the alternative density of at least 1000 would support the increase of largeable family-type homes and allow for a mix of small units without being restricted to only box-cutter constraints for potential urban designs.

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PROJECT 3806112 EIR COMMUNITY PLAN GOLDEN HILL 30TH STREET CORRIDOR LAND USE

The alternative, RM 3-7 or RM 3-8 better supports flexibility and affordability in building and offering more affordable rental and/or purchase units using a more doable FAR. This alternative can consider how vital the growth of children in the community positively impacts the use and access to schools, parks, and family friendly places to attract tourists and to increase community populations that can thrive as sustainable communities with smart growth incentives that mutually benefit all.

C16-7

SUMMARY:

The applicant-owner, Pastor Thomas L. Sims and his wife-Licensed Real Estate Broker-Consultant have been organizing, serving and advocating for quality life and healthy development in the community for over 16 years. The operations as Community Advocates and Church Ministry Developers under the supplemental auspices as a church facility is to improve and offer assets to the community that enlarges the mission of the church and engages in the overall quality enhancements to the 30th Street Corridor. They would like the opportunity to support the revitalization of the 30th Street Corridor, with its prime location on the corner with access to the alley and both 30th and B Streets by serving as stakeholders to the Community Plan with a conceptual improvement to the overall Greater Golden Hill community.

The 30th Street Corridor is undergoing the development of 15 new multi-family townhomes at the corner of Broadway and may soon boasts of a mixed-used commercial project at C Street as well as upgrades to existing multi-family units under development at the Southwest and Northwest boundaries to the subject property. The community boasts convenience for both pedestrian, biking and automobile traffic and benefits from the Transit Orientation that further compliments a major entrance into Golden Hill Community. Hence, the 30th Street Corridor and additional revitalization would support what is known as City of Villages, Place Making and Middle Housing trends across the Housing and Urban Industry. The urbanized 30th Street Corridor is currently undergoing improvements to the surrounding properties that help attract residents into Golden Hill-North Park-South Park and other Neighborhood Gateways. The following precedence justifies the applicant's concern for equal opportunity to promote like property development that compliments and further supports the Community Map for both the neighborhood corridor and the city, at large.

1) There is an existing 15 Unit new townhomes development underway at 1021 30th Street which supports an infill of two combined parcel-addresses *with a density of 600*. This property serves as a sample of what other development enhancements are available on the 30th Street Corridor. That project known as the Guild at 30th Street boasts new market rate dwelling units and has been embraced by the Planning Committee.
2) There is a Notice of Application for an upcoming public hearing for 30th and C St – SDP to demolish and construct a mixed unit Commercial Store (Miller's Market) and addresses known as 1048 30th , zoned and 2957-2979, *with a density of 1000*. This project proposes to build 37 units on .83 acre. The applicant feels that such opportunity along with the current request for alternative to the EIR will bridge the 30th Street corridor and enhance curb appeal by owners.

The entitlement property at 2731 B Street had to combine two parcels with the GH-1500 density to better accommodate their raw land for 11 new multi-family units. This property is down the street from the subject project but is a sister property to the 20 rental dwelling units, currently for sale at C Street. Investors are building the project that is along the B Street area, too. The property sits at the corner of Thomas L. Sims 1144 30th Street San Diego CA 92102 Golden Hill 539-531-29-00
Prepared by Ethel E. Sims – Real Estate Ambassador & Partners – CABRE# 0932098
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C16-7 Refer to response to comment C16-3.

30th Street and B Street where revitalization and property upgrades have been trending as a benefit to the community by providing beauty and increased rental and sales inventory to the community residents and potential homeowners.

30th Street Corridor serves as a major transit hub and gateway for travel by pedestrians, bikers and automobile frequency from SouthEast San Diego to University Heights and North Park communities.

B Street serves as the city's skyline and bridge between Golden Hill and Downtown aligning City College and popular tourist attractions like Balboa Park, Little Italy and East Village. The B Street improvements further promote desired accessible to the south and east, with multi-family residential to the west and north.

C16-8

FINAL DISCUSSION –

In Comparison to similar examples of like infill properties, the applicant is suggesting consideration be given to the lack of response for the changing of the density to the subject property. The subject property at 1144 30th Street would better reflect the Community Plan by providing a local owner who has served in the community for over 16 years to ad in providing various housing options to accommodate all age, income and social groups for the up and coming popularity of Golden Hill.

Although the recent amendment to the Density Bonus for Affordable Housing provides incentives to outside investors who are savvy in Affordable Housing Development, it is the applicant's opinion that the property be given not only the highest best use - but given consideration that supports a variety of housing appeals using the best density for the area to better design and reflect the character of the community and to also benefit as a local ownership and stakeholder in the Golden Hill Community. The applicant, Pastor Thomas L. Sims has served and volunteered on several community groups and committees, and local non-profit Boards to help serve and support the goodwill of the Golden Hill Community.

Having the opportunity to make good on the assets in the community, the density change would enable the owner to make better choices and help perhaps promote the Affordable Housing opportunities as a model for other local congregations, pastorates and non-profit organizations desiring to revitalize and expand economic development opportunities for local citizens and Housing Advocates across the City of San Diego.

Affordability that involves the applicant's input and personal investment opportunity to the community serves as a global approach to mutual benefactors who are advocates to enhancements if given equal access to develop like-character property on the same Corridor. The project would also complement itself as part of the 30th Street Revitalization upgrades allowable to the North end of 30th Street Corridor's Revitalization and serve as model community models to market the City of Villages and Middle Housing 21st Century development for small scale community attractions.

Thomas L. Sims 1144 30th Street San Diego CA 92102 Golden Hill 539-531-29-00
Prepared by Ethel E. Sims – Real Estate Ambassador & Partners – CABRE# 0932098
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C16-8 Refer to response to comment C16-3.

PROJECT 3806112 EIR COMMUNITY PLAN GOLDEN HILL 30TH STREET CORRIDOR LAND USE

Table 1

Ch. Art. Div. 15 8 3

Table 158-03K
Maximum Number of Dwelling Units
Zone Maximum Units

GH-600 40
GH-1000 24
GH-1250 16
GH-1500 14
GH-2500 5
GH-3000 4
GH-CN and GH-CC 14

Ch. Art. Div. 13 1 4

The following zones permit medium density multiple dwelling units:

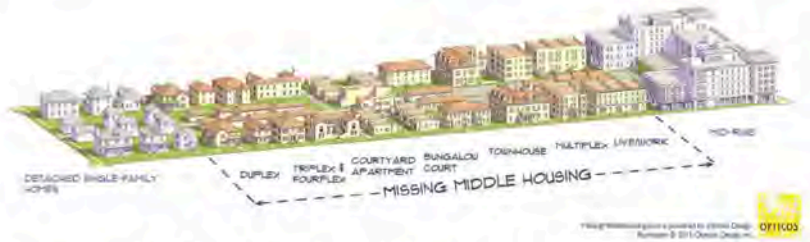
- RM-2-5 permits a maximum density of 1 dwelling unit for each 1,500 square feet of lot area
- RM-2-6 permits a maximum density of 1 dwelling unit for each 1,250 square feet of lot area.

As a suggested alternative:

The following zones permit medium density multiple dwelling units *with limited commercial uses:*

- RM-3-7 permits a maximum density of 1 dwelling unit for each 1,000 square feet of lot area.

Exhibit A



THIS IMAGE MAY ONLY BE USED WITH ACCOMPANYING ILLUSTRATION ATTRIBUTION TO OPTICOS DESIGN, INC

NOTE:

Developing improved housing options for everyone, however, is passing from the realm of "nice to do" to "must do." That's going to be shaping the housing trends going forward.

Source: U.S. Census Bureau, Table 19: Homeownership Rates by Age of Householder: 1994 to Present.

12 Emerging Trends in Real Estate® 2016

Being able to offer a blend of property opportunities, the appeal for lower density for the subject property offers an innovative addition to what is known as Middle Housing units.

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Letter C17

PROJECT NAME: North Park and Golden Hill Community Plan Updates
PROJECT No. 380611 / SCH No. 2013121076

To Kurtis Steinert, Senior Environmental Planner, City of San Diego
Planning Department, 1010 Second Avenue, MS 413, San Diego, CA 92101

C17-1 Thank you for the opportunity to comment on the Draft PEIR for the Community Plan updates for the North Park and (Greater) Golden Hill communities.

I will restrict my comments to the Golden Hill portion of the document, although some comments may apply equally to both communities covered by the review.

C17-2 The title of the document should match that of the project, and should read "Greater Golden Hill" rather than simply "Golden Hill." The short version would be understandable within the body of the text, but the PEIR title should correspond to that of the project. Please correct in the final document.

C17-3 I concur with the determination on page 2 that this plan update, while offering improvements in a number of areas, may well have significant adverse impacts on our Greater Golden Hill community. But I believe there are deficiencies in the analysis, which should be corrected to more accurately consider these impacts.

Following are several of these deficiencies.

C17-4 Page 7.12-5
Recreation Element.
As the document correctly recognizes, Golden Hill currently has no parks or recreation facilities (67 acres are required by City standards) to serve its present, or future population. The plan essentially designates portions of Balboa Park ("park equivalencies") and the development of paths and portions of open space as parks.

C17-5 However, the plan fails to specify uses beneficial to the community as opposed to the entire San Diego Region (other than a multi-modal path on Golf Course Drive currently being "studied").

C17-6 The "park equivalencies" proposed generally serve a the larger community, and do not serve residents of Golden Hill the way a community park would, and they are not easily accessible to some portions of our community.

C17-7 While the adverse impacts (of limited planning for park and rec facilities in the community) may be minimized, this reliance on "park equivalencies" has significant impacts on quality of life for those Golden Hill neighborhoods that have the least access to these resources.

C17-1 This is an introductory comment. The City appreciates your participation in the public review comment process.

C17-2 Comment noted. The project and title are "North Park and Golden Hill Community Plan Updates." The environmental analysis for the North Park Community Plan and Golden Hill Community Plan is located in Chapter 6 and 7 of the Draft Program Environmental Impact Report (PEIR). The PEIR title correctly corresponds to the project. The community name per the General Plan is Greater Golden Hill; however, the Community Plan document title is Golden Hill Community Plan.

C17-3 This is an introductory comment that makes a general statement that the updated plan has deficiencies that would result in adverse impacts; but does not cite any specific inadequacies, thus a specific response cannot be provided. The City does not agree that the analysis in the referenced plan has deficiencies. The more detailed comments that follow are addressed in the following responses.

C17-4 This comment makes reference to the Impact Analysis of Public Services and Facilities of the PEIR, Section 7.12.3b (Parks and Recreation). The PEIR acknowledges the deficiency in park space within the Golden Hill community and that buildout of the proposed Golden Hill CPU would add additional population to the area, continuing the deficit of population-based parks. The City recognizes the need for population-based parks serving the Golden Hill community; however, where vacant land is limited, unavoidable or is cost-prohibitive, the General Plan allows for the application of park equivalencies as determined by a set of guidelines in the General Plan. As detailed in the proposed Golden Hill CPU, opportunities for new park land and recreation facilities are anticipated to come primarily through redevelopment of private and public properties and through the application of park equivalencies.

C17-5 This comment does not relate to the adequacy of the analysis presented in the Draft PEIR; therefore, a detailed response is not warranted. However, the proposed Golden Hill CPU Recreation Element provides policy framework that supports acquisition and development of new public parks and park equivalencies and encourages new private development to include recreational facilities that would benefit the

C17-5 (cont.)

Golden Hill community. Currently the Golden Hill community has no park land. Once implemented, the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage to an amount of 48.57 acres of identified park land and park equivalency sites within and adjacent to the Golden Hill community.

C17-6 This comment does not raise a specific issue with regard to the adequacy of the Draft PEIR, rather is stating information about park equivalencies. The City recognizes the need for population-based parks serving the Golden Hill community; however, where vacant land is limited, unavoidable or is cost-prohibitive, the General Plan allows for the application of park equivalencies as determined by a set of guidelines in the General Plan. As detailed in the proposed Golden Hill CPU, opportunities for new park land and recreation facilities are anticipated to come primarily through redevelopment of private and public properties and through the application of park equivalencies.

C17-7 This comment does not raise a specific issue with regard to the adequacy of the Draft PEIR, thus a detailed response is not required. The comment expresses an opinion about the impact of park equivalencies on the quality of life for Golden Hill neighborhoods. Refer also to response to comment C17-6. The City recognizes that there is an existing and projected deficit in population-based parks; however, the proposed Golden Hill CPU includes policies that would support creation of park land and common recreational amenities. At a program level of analysis, implementation of the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage of population-based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact related to parks and recreation, and no mitigation is required.

C17-8 Plan proposals would not result in "conventional" active or passive park facilities, especially for the underserved residents in the neighborhoods of the southeastern portion of our GH community. "Community Parks," even those provided as "equivalencies," should be easily accessible to residents in all parts of the community by non-motorized transport (e.g. walking, wheel-chair, bikes, etc.)

C17-9 The impact on the City Climate Action Plan (CAP), carbon footprint, air quality, etc., of motor vehicle trips required to access these basic facilities should be addressed in the PEIR, but has not been considered.

C17-10 The plan should be revised to incorporate the development of conventional park facilities, per City standards, dispersed within the GH Community, and respectful of wild spaces and canyon lands, and should recognize the impact of a failure to achieve this goal.

Please incorporate a discussion of these adverse environmental impacts in the final document.

C17-11 Historic Preservation Element. (7.7)

Adverse impacts of the CPU on historic resources in the Greater Golden Hill Community would be, as the document recognizes, "significant and unavoidable" (page 7.7-1, 7.7-13, 7.7-14), and the proposed "interim protection" measures and existing 45-year review program would neither mitigate nor avoid these impacts, especially on contributors to proposed potential historic districts or the "multiple property listings (MPL)" recognized in the Community Plan.

This is the case for both North Park as well as Greater Golden Hill.

C17-12 The discussion of proposed MPL for residential courts ("bungalow courts") in North Park (6.7-14 d.) and Greater Golden Hill (7.7-11 d.) should be cross-referenced and linked in some manner.

C17-13 Planning group boundaries are arbitrary applied constructs, and the historical development patterns often cross these artificial lines. While these (MPLs) are being considered in the same PEIR, the separated discussion gets close to project segmentation, contrary to the goals of CEQA.

C17-14 The consideration of these MPLs should be connected, and that oversight should be corrected in the final document.

C17-15 The description of existing conditions and context (7.7-1, and following) for this section is generally well done, but missed discussion of historic narratives of our more recent past.

C17-8 The City acknowledges this comment about the need for park space within the Golden Hill community; however, this comment does not relate to the adequacy of the analysis presented in the Draft PEIR and thus, a detailed response is not provided. However, once implemented, the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage to an amount of 48.57 acres of identified park land and park equivalency sites within and adjacent to the Golden Hill community, including a neighborhood park identified on vacant land within the southeastern portion of the community. Complimentary mobility element policies would support improvements to non-motorized transport that would make it more accessible for all residents regardless of their mode of transport.

C17-9 The City acknowledges this comment and the need for park space within the Golden Hill community. Currently the Golden Hill community has no park land. Thus, in the existing condition, residents are already required to drive to access recreational facilities and the proposed CPU would not result in a change to this existing condition. Thus, the Draft PEIR is not deficient in terms of addressing impacts related to vehicle trips to community parks.

C17-10 The City recognizes that there is an existing and projected deficit in population-based parks, which is an adverse impact, but it is not considered significant at this program level of analysis. Implementation of the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage of population based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact related to parks and recreation, and no mitigation is required. The Draft PEIR already includes a discussion of the availability of park facilities in the community in Section 7.12.1.2 and the existing deficit is acknowledged in Section 7.12.3.

C17-11 This comment does not raise a specific issue with regard to the adequacy of the Draft PEIR; thus, a detailed response cannot be provided. The City acknowledges that the Draft PEIR includes a number of significant and unavoidable impacts that at a program level of analysis could not be fully mitigated to less than significant. Future projects implemented in

C17-11 (cont.)

accordance with the proposed North Park and Golden Hill CPU would require a subsequent environmental analysis to identify the site-specific impacts and mitigation measures that are not possible to identify at a program level of analysis. For example, Multiple Property Listings (MPLs) would be protected through current regulations requiring evaluation of resources 45 years old or older.

C17-12 This comment is referencing Section 6.7-14d and 7.7-11d in the Draft PEIR. The discussion of MPLs for each community is intended to be separate. The analysis for each community is based on individual Historic Resources Surveys for each community included as Appendices G-2 and M-2 to the Draft PEIR as cited in the introductory paragraphs on pages 6.7-1 and 7.7-1. This comment does not raise an issue with regard to the adequacy of the Draft PEIR.

C17-13 The project for purposes of the Draft PEIR is the North Park and Golden Hill CPUs and associated discretionary actions as described in Chapter 3 of the Draft PEIR. As described in the Draft PEIR (Section 1.3.2), the analysis for each community is included into two separate chapters, Chapter 6 for North Park and Chapter 7 for Golden Hill. The presentation of impacts in separate chapters is intended to make the document more user friendly for reviewers by providing analysis of impacts specific to the community of interest. Additionally, the cumulative impacts of build-out of all pending CPU updates are address for each issue area. Thus, the project is not segmented and no revisions are required.

C17-14 Refer to response to comment C17-12.

C17-15 This comment is referencing the Existing Conditions in Section 7.7-1, which provides a discussion of the Golden Hill community's past. The theme of GLBTQ history is not included within the Draft PEIR because the City is still in the process of obtaining information about this important part of San Diego history. The City commissioned preparation of a San Diego LGBTQ Historic Context Statement in October 2015, long after the completion of the Golden Hill and North Park Context Statements and Surveys (Appendices G-2 and M-2). The San Diego LGBTQ Context

C17-15 (cont.)

Statement will not be finalized until September 30, 2016. The San Diego LGBTQ Historic Context Statement will identify the themes significant to the LGBTQ community throughout San Diego – including North Park and Golden Hill. Once finalized, the San Diego LGBTQ Historic Context Statement will be used as a resource to provide background information about this part of the area's history.

One significant theme, which should be acknowledged here, is GLBTQ history, specifically the founding of the San Diego's first GLBT "Center," located in Golden Hill (at 2250 B Street). Please incorporate this theme in the overview of Golden Hill's history.

C17-16 While land use intensities supported by zoning recommendations may not be changing, and are in some cases relaxing, they are still often much higher than that of the historic built environment (at twice or greater density).

C17-17 Coupled with land use overlays, such as the "City of Villages" which encourage a more intensive development in the historic core of the proposed Historic Districts (e.g. 30th and Beech), the plan update brings new pressures on historic and cultural resources in the area.

These nodes often occur in the historic commercial areas of early development of the "street car suburbs," at the places where the streetcar stops were located. And these places continue to provide a neighborhood center and hub of economic and social activity, as they were originally designed to do.

They are an important element of the historic districts. As such they should not be targeted for redevelopment as the plan update seems to do, but rather for preservation.

And these commercial areas have been specifically exempted from all versions of "interim protective" strategies.

This three-part threat to the core of historic communities should be formally addressed in the PEIR.

Lack of any interim protection, more intensive zoning, and active incentives encouraging intensity (i.e. City of Villages) are a "one, two, three strikes and you're out" for these historic community centers, and the draft PEIR avoids any analysis of this.

Please correct the draft to include a discussion of this multiplier effect which promotes adverse impacts.

C17-18 Protection and preservation of this community character is one of the central stated goals of the current plan as well as this update.

Throughout the update process the concept of tailored zoning, including concepts such as "conservation districts," historic districts, and planned district ordinances (PDO), have been at the core of the of public discussions.

The removal of the PDO, rather than expansion or retention, and the substitution of Citywide zoning, creates an additional impact that must be considered by the DPEIR review.

C17-15 (cont.)

Statement will not be finalized until September 30, 2016. The San Diego LGBTQ Historic Context Statement will identify the themes significant to the LGBTQ community throughout San Diego – including North Park and Golden Hill. Once finalized, the San Diego LGBTQ Historic Context Statement will be used as a resource to provide background information about this part of the area's history.

C17-16 This comment is referencing land use zone recommendations and is a general introductory comment. That does not relate to the adequacy of the analysis presented in the Draft PEIR; therefore, a detailed response is not warranted. However, the City acknowledges that the planned residential densities are generally higher when compared to the adopted densities. In comparison to the existing Community Plan, proposed densities are only slightly greater, with a reduction in the amount of commercially designated lands.

C17-17 The City does not agree that the changes in land use will create pressure on the historic and cultural resources in the area. Within all areas of the CPU, the existing Historical Resources Regulations of the San Diego Municipal Code (Chapter 14, Article 3, Division 2) would apply. The regulations require applicants to prepare a historic property (built environment) survey for proposed development on properties with structures over 45 years old that appear to meet one or more of the City's designation criteria and retain integrity of setting, design, materials, workmanship, feeling, and/or association.

The City acknowledges the importance of the historical streetcar routes as it is presented in the Draft PEIR. The City of San Diego's General Plan, combined with federal, state, and local regulations, provide a regulatory framework for project-level historical resources evaluation/analysis criteria, and when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources—such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the

C17-17 (cont.)

subsequent project review process. The proposed mitigation measures (MM-HIST-1 and MM-HIST-2) provide a framework that would be required of future development projects with the potential to impact significant historical resources.

The proposed supplemental development regulations would provide protection for the proposed South Park and Culverwell and Taggart's Addition potential historic districts by protecting contributing resources from alteration that could affect the district's potential eligibility. It is correct that commercial areas would not be subject to the proposed supplemental development regulations; however, the existing Historical Resources Regulations would apply to potentially historic commercial properties. The potential threat to the integrity of potential historic districts is addressed within the Draft PEIR in Section 7.7.4. In addition to the proposed supplemental development regulations that would provide protections for Potential Historic Districts, a mitigation framework for protecting historic buildings, structures and objects is provided in Section 7.7.6 of the Draft PEIR. Nonetheless, the analysis concludes that because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this time, the impact on historic resources of the built environment would remain significant and unavoidable.

C17-18 Neighborhood character impacts for the Golden Hill community are addressed in Section 7.2.3, Issue 2 of the Draft PEIR. The analysis specifically addresses the repeal of the Golden Hill Planned district Ordinance and the rezone of parcels using existing citywide zoning. As discussed in that section, citywide zones would apply similar development controls to those currently in place under the Golden Hill Planned District Ordinance. These include land use typologies (e.g., neighborhood commercial, multi-family residential etc.), residential density and major components of the building envelope such as floor area ratios, heights, and setbacks. Additionally, the proposed Golden Hill CPU provides design guidelines in the Urban Design Element that would guide development during discretionary review to ensure neighborhood character is maintained and enhanced.

LETTER		RESPONSE	
C17-19	In spite of some very strong language in various sections as goals or policies (e.g. LU-25 LU.2.7 and UD-63 UD-2.6, et al) the plan update creates or maintains approaches which may have significant and unavoidable negative, and unmitigated, impacts on the character and quality of our neighborhoods of the Greater Golden Hill community.	C17-19	Comment noted. This comment makes a general statement about the significant impacts that will result from proposed Golden Hill CPU policies; however, it does not provide any reasoning as to why those significant impacts would occur. The referenced policies are all supportive of protecting the character of the community.
C17-20	In the "last" round of CPUs in the 1980's, an interim protective measure, in the form of an emergency ordinance was adopted during the plan update process in the Southeastern community, for the Sherman Heights Historic District. And that district, which was an element of the CPU, was brought on line essentially concurrently with the Community Plan adoption, to minimize adverse impacts and to implement the plan. Such an approach would still be the most effective way to minimize adverse impacts and mitigate the adoption of the CPU. A strict timetable and concurrent adoption of historic districts, with a program with community participation and direction, would go a long way to meet the needs of the community, and minimize adverse impacts of the CPU. The proposed South Park Historic District has been in play now for twenty years, since the 1996 mid city survey, and the credibility of any "interim" period has been stretched pretty thin.	C17-20	This comment is suggesting that a Historic District should be implemented concurrently with adoption of the CPU. However, at this time, adequate surveys have not been completed to allow the Potential Historic Districts to be adopted as Historic Districts. Thus, the City has proposed identification of Potential Historic Districts that would be protected by amendments to the Historical Resources Regulations that would provide supplemental development regulations protecting modifications of potentially contributing resources in order to maintain the integrity of the Potential Historic District until such a time that it can be intensively surveyed, verified, and brought forward for designation consistent with City regulations and procedures.
C17-21	Concurrent adoption of the proposed Historic Districts, "Culverwell & Taggart's Addition" and "South Park" was the unanimous recommendation of the Greater Golden Hill Community Planning Committee, the community planning group for the Golden Hill area.	C17-21	Comment noted. The City acknowledges the stated recommendation and support for the Culverwell & Taggart's Addition and South Park Historic Districts.
C17-22	Project alternatives.12.2.2 (g) Review of the impact of the "higher density alternative" impact on historic/cultural resources is inadequate (12-13). Reliance on the proposed "interim protection" measures under the "preferred project" is questionable at best and, as acknowledged, potential impacts would be significant and unavoidable. This option would intensify those threats, and the analysis should reflect this, rather than suggesting a similar adverse impact for this alternative. Please correct.	C17-22	The City does not agree that the analysis is inadequate. Under both the proposed project and the Higher Density Alternative, impacts to Potential Historic Districts would be protected by implementation of amendments to the Historical Resources Regulations that would provide supplemental development regulations for contributing resources within the Potential Historic District. The analysis of the Higher Density Alternative already concludes that the impact would be significant and unavoidable, similar to the proposed project. Proposed policies (e.g., LU-2.4 through LU-2.7), and existing development regulations would ensure development, including higher density development, is designed to be consistent with community character. Thus, no change is required to the Draft PEIR.
C17-23	Both the analysis in that section, and in discussion of the "lower density" alternative (12.3.2 (g)) describe adverse impacts to historic resources, but fail to discuss impacts to identified historic districts by the loss of "contributors." This discussion does appear, somewhat, in the discussion of the preferred project alternative, but is lacking in review of these alternatives. These sections should be corrected to include a discussion of this impact on historic districts, as well as on the goals of the community plan update of preserving historic resources and community character. Yours, David Swarens.	C17-23	The focus of the alternatives analysis is on how the alternative would reduce potentially significant impacts of the project. Thus, where an impact would be greater or lesser than the project, this is described. Under both the Higher Density and Lower Density Alternatives, the

C17-23 (cont.)

Potential Historic Districts and associated supplemental development regulations would be retained. Thus, the impact associated with the loss of contributing resources would be similar to the project because these resources would be subject to the same protections through the amendments to the Historic Resources Regulations. Similarly, the goals of the CPU for preserving historic resources and community character for these two alternatives would be the same as the project as described in the descriptions to the alternatives (Sections 12.2.1 and 12.3.1). No changes to the Draft PEIR are warranted.

Letter C18

From: Randi Vita <rvita@lji.org>
Sent: Wednesday, June 08, 2016 6:01 PM
To: PLN_PlanningCEQA
Subject: PROJECT NAME: North Park and Golden Hill Community Plan Updates PROJECT No. 380611 / SCH No. 2013121076

C18-1 Hi, I am writing to voice opposition to this plan. The people who are affected by these changes to our neighborhood are very upset and feel ignored.

We are opposed to the Pedestrian-Oriented Density Bonus area because it
a) Unfairly targets the most affordable housing in North Park for elimination. This results in selectively driving out the middle and lower class people from North Park. This is blatant discrimination as this plan was devised by people who do not live in the Pedestrian-Oriented Density Bonus area, while the people who do live in this zone have repeatedly voiced their concerns and opposition to this plan. The Pedestrian-Oriented Density Bonus area specifically encourages the redevelopment of some of the most affordable housing in all of San Diego (per craigslist.org). When this housing is redeveloped, it is replaced with housing that is 2-4 times more expensive than what is on the ground now (per craigslist.org). This displaces the middle and lower classes out of North Park as they cannot afford the new housing being built. It eliminates affordable units, for example, when 10-12 currently occupied affordable units are replaced with 38 new very expensive units and 2 affordable units. But
C18-2 developers do not even have to include the 2 affordable units, instead they can pay a fee or install a new public bench instead. This is an option they often take. The people who live in these existing affordable units are in the process of meeting with the ACLU to address this discrimination.

C18-3 b) This plan does not reflect the current character of the areas included in the Pedestrian-Oriented Density Bonus area. The plan characterizes this area as "non traditional" meaning that it no longer predominantly contains pre-1960 housing. This characterization is simply not true. Several streets included in this plan are entirely traditional pre-1960 housing (Polk and Lincoln are 100% original housing, Howard is 95% original housing). There are hundreds of pre-1930 original single family homes in the Pedestrian-Oriented Density Bonus area. There are hundreds of pre-1920s homes in this area, as much of it was built prior to the later boom that created the areas that this plan does protect. There are dozens of charming bungalow courts and several Victorian houses. We, my neighbors and I, counted and dated these homes and provided this information to the
C18-4 planners. This plan is simply not protecting a very large number of historic single family homes. It only protects the more affluent homes located where the people who developed this plan live. When a multi-story apartment building is built right beside a single family home, following the revised guidelines that require essentially no setbacks, the tiny single story original craftsman bungalow is left unlivable and easy picking for developers to destroy. Developers can and have easily obtained permits to destroy these homes, despite the review process. They even destroy them without permits in this part of town because there are no repercussions. In order to be fair, the same basis used to protect historic homes outside of the Pedestrian-Oriented Density Bonus area must be used to protect the historic homes in all of North Park, not just the homes in the more affluent areas. It seems that the planners can only acknowledge large numbers of historic homes when they are located in their neighborhoods, while ours are seemingly invisible to them. The developers of this plan have zoned their areas to match what is currently built, while they zoned our area drastically different from what is currently built. Again this is unfair and discriminatory.

C18-5 We oppose the massive density changes as part of both the Transit-Oriented Density Bonus area and the Pedestrian-Oriented Density Bonus area because
a) The majority of people who live in North Park commute out of North Park using San Diego's most congested transit corridors of the 805 North, 163 North, and 5 North to get to their jobs (dot.gov). This is already San Diego's worst traffic as people living south of I-8 try to get to their jobs, primarily located North of the 52

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C18-1 The City acknowledges your opposition to the plan and specifically to the discretionary Pedestrian-Oriented Infill Development Enhancement Program. Since the nature of this comment is not related to the adequacy of the Draft PEIR, a detailed response is not required under CEQA; however, the following response is provided for informational purposes. The intent of the Pedestrian-Oriented Infill Development Enhancement Program is to provide an incentive to redevelop auto-centric residential projects that detract from the character of the community while providing new residential units that meet California Title 24 requirements, fulfill the urban forestry and complete streets objectives for walkable communities that are contained in the community plan. The City's intent is not to discriminate against residents living in these areas, rather to provide opportunities for future development that would help the City implement the City of Villages Strategy laid out in the General Plan. The current adopted community plan allows for up to 44 dwelling units per acre which is consistent with the maximum base density in the proposed CPU which is 44 du/acre. Since the Pedestrian-Oriented Infill Development Enhancement Program is discretionary, any new development would be subject to public and environmental review. All new development is subject to the City of San Diego's Inclusionary Affordable Housing Ordinance, which requires all new residential development of two or more units to set aside 10 percent of the number of for-sale dwelling units to be affordable or to pay an inclusionary affordable housing fee subject to agreements with the San Diego Housing Commission. The City does not agree that the proposed Pedestrian-Oriented Infill Development Enhancement Program discriminates against residents living in these areas. The proposed Pedestrian-Oriented Infill Development Enhancement Program provides an incentive to developers to provide higher density housing within these areas that are in close proximity to transit. The program satisfies the goals and intent of the General Plan's City of Villages strategy and the City's CAP. While redevelopment of existing residential land uses, by its nature, causes a temporary displacement of residents, redevelopment with higher density housing increases the housing stock available to residences and helps the City meet its housing goals.

C18-2 Refer to response to comment B2-6.

C18-3 The North Park CPU characterizes the areas within the proposed Pedestrian-Oriented Infill Development Enhancement Program area as primarily "multi-character areas" (versus traditional character areas), which recognizes there are a variety of housing types including traditional housing as indicated by the commenter.

As indicated within Chapter 4 of the CPU, the vision for Multi-Character Neighborhoods is to preserve and enhance traditional architectural and design themes, and to redesign or replace buildings from the 1960s to 1980s with buildings that are consistent with the pedestrian orientation that was originally developed when the streets and sidewalks were built. The Community Plan envisions design flexibility and innovation while ensuring compatibility with the traditional character buildings.

C18-4 The City does not agree that the Plan does not adequately protect historic homes. Within all areas of the proposed North Park CPU, including within the discretionary Pedestrian-Oriented Infill Development Enhancement Program area, the existing Historical Resources Regulations of the San Diego Municipal Code (Chapter 14, Article 3, Division 2) would apply. The regulations require applicants to prepare a historic property (built environment) survey for proposed development on properties with structures over 45 years old that appear to have integrity of setting, design, materials, workmanship, feeling, and association.

C18-5 The City acknowledges the commenters opposition to the discretionary Pedestrian-Oriented Infill Development Enhancement Program and the discretionary Transit-Oriented Development Enhancement Program (Community Plan Enhancement Program Areas). These programs are intended to facilitate transit-oriented development and pedestrian-oriented development, by increasing density near transit and commercial services by processing a planned development permit.

The Draft PEIR addresses the traffic conditions on the major roads and freeways surrounding the CPU areas and acknowledges that the existing freeway level of service in the area includes segments that operate at LOS E and F (refer to Tables 6.3-4 and 7.3-4 of the Draft PEIR). The Draft PEIR acknowledges significant and unavoidable impacts to roadway segments, intersections, and freeway segments and ramps would occur as a result of implementation of the proposed North Park CPU.

C18-5 (cont.)

However, the City does not agree that it is irresponsible development to add density within the proposed Community Plan Enhancement Program Areas because contrary to the comment, allowing higher density within these areas that are close to employment and commercial centers (e.g., Downtown, Mission Valley) would work to achieve the City's City of Villages Strategy by locating residences within proximity to transit to encourage multi-modal transportation and reduce greenhouse gas emissions. These concepts form the foundation of the City's General Plan and is the basis for the recommendation to locate density in these areas.

LETTER

C18-6

freeway (per dot.gov). It is a well known fact that commuting out of North Park is already miserable. Adding so much more density south of I-8 is irresponsible development. It is bad for the environment to encourage new commuters to move to what is already one of the most congested areas in San Diego. Responsible development must consider where people work in order to shorten commute times and lessen green house effects and this plan does the opposite. All of the middle and lower class people that will be forced out of North Park will have to move even further from their jobs. These are the people who are currently most utilizing the public transportation and they will be forced out to live in areas where public transportation is not available to get them to their jobs. I personally know of 12 cases of this already happening as a result of new development. The people forced out had to move from North Park to Escondido, Tijuana, Santee, La Mesa, and Vista in order to find equally affordable housing as to what they previously had in North Park (pre-redevelopment). All of these people still commute into San Diego for work and all of them now have longer commutes and none of them utilize public transportation since their moves b/c it is no longer practical.The new people who will move into the new luxury housing that is to come, according to this plan, will have to be wealthy in order to afford the new units and they will be less likely to use public transportation. This plan lengthens commute times, increases traffic problems, calls for no infrastructure changes to offset these problems, and increases pollution and green house effects as it results in more people living further from their jobs and less people utilizing public transportation.

C18-7

b) It is unwarranted. The Sandag projected need for our area can be easily met without upzoning. New housing and much more affordable housing are desperately needed closer to the Golden Triangle where large numbers of people commute to everyday (dot.gov). In North Park, we already have zoning that is more than sufficient to meet our growth needs without any destruction of historic properties or displacement of the middle class according to Sandag projections. If many of the commuters currently living in North Park could find more affordable housing closer to where they work, they could afford to move out of North Park and closer to their jobs. If that could happen, then North Park would not have to be one of the few remaining affordable housing locations left in San Diego. But to push these people out now, long before any other affordable housing exists is unwarranted and unfair. There is no data to support the need for upzoning any part of North Park. Upzoning selectively the least affluent parts of North Park is blatantly discriminatory. Additionally, we already have surpassed the density required for "Transit-Oriented Density" at our current population. Replacing a population that currently does utilize public transportation with a more affluent population will result in lower ridership and increase pollution as less people utilize public transportation.

C18-8

Here are the names of some of the opposed residents:
Janice Banales 4169 Alabama St 92104 retired Garland Merfeld 4091 Alabama St 92104 web designer Alicia Winquist 4205 Alabama St 92104 scientist Philip Ells 4211 Alabama St 92104 Rebecca Ford 4176 Florida St 92104 nurse Jessica Block 4170 Florida St 92104 geologist Elizabeth Shea 4169 Florida St 92104 writer Murakami Hideyuki 4170 Florida St 92104 scientist Paula Sevier 4206 Florida St 92104 retired Jennifer Verruto 4065 Georgia St 92103 interior designer Joshua Cole 4222 Georgia St 92103 realtor John Verruto 4065 Georgia St 92103 musician Chris Parkes 4075 Georgia St Business Consultant Mark Koopman 2019 Howard Ave 92104 programmer Randi Vita 2019 Howard Ave 92104 scientist Billy Matthews 1826 Howard Ave 92103 programmer Eric Cathcart 2025 Howard Ave 92104 geologist Jennifer Cathcart 2025 Howard Ave 92104 programmer Nicky Gladwin 2002 Lincoln Ave 92104 Richard Walters 2002 Lincoln Ave 92104 accountant Candice Pierson 4148 Lousiana St 92104 nurse Evone Starks 3996 Lousiana St 92104 clergy Mrs Saint Pierre 4137 Lousiana St 92104 small business owner Jason Saint Pierre 4137 Lousiana St 92104 small business owner Liz Flynn 4053 Mississippi St 92104 teacher Joseph Paskevich 4104 Mississippi St 92104 programmer Larry Vincent 4104 Mississippi St 92104 navy Stephanie Gaudreau 4061 Park Blvd 92103 author, trainer Cheree McMahon 4033 1/2 Park Blvd 92103 retired Mark Jatezak 4037 Park Blvd 92103 retired Vickie Lee 2212 Polk Ave 92104 therapist Rose Dutra 1834 Polk Ave 92103 flight attendant anonymous 92104 Logan Five 1915 Polk Ave 92104 interior designer Pavel Romanenko 2013 Lincoln Ave 92104 financial services Matthew Merrow 2337 Lincoln Ave 92104 Savannah McCoy 2337 Lincoln Ave 92104 biotechnology Christine Kuglen 4050 Mississippi St 92104 educator Rafter Roberts 1919 Howard Ave 92104 musician Lizeth Santos-Roberts

2

RESPONSE

C18-6 The City acknowledges the concern of the commenter that new development would be less affordable, that the existing residents will be forced out of the area, and the new, more affluent residents would be less likely to use public transit. Despite the examples cited by the commenter, broad application of these assumptions to the analysis conducted within the Draft PEIR would not be consistent with typical modeling assumptions used by traffic engineers and would be considered speculative. Transportation assumptions used in the Draft PEIR are based on established transportation modeling methods. Specifically, as set forth in the Traffic Impact Analysis (Appendix B of the Draft PEIR), the Synchro 8.0 (Trafficware) model was used for the analysis which uses the methodologies outlined in the 2000 Highway Capacity Manual (HCM) published by the Transportation Research Board. Thus, while the Draft PEIR acknowledges that implementation of the North Park CPU would result in significant transportation impacts, the City does not agree that implementation of density within the Community Plan Enhancement Program Areas would lengthen commute times and increase greenhouse gas emissions.

Regarding the comment that there are no proposed infrastructure changes to offset these problems, the City has developed a Development Impact Fee (DIF) that would address the need for public facilities associated with the identified needs of the North Park and Golden Hill CPU areas. As a planning document, the CPUs do not propose specific roadway or infrastructure improvements; rather, they provide a framework to guide future growth within the community.

C18-7 The comment is not related to the adequacy of the Draft PEIR; thus, a detailed response is not required under CEQA. The reference about the SANDAG projected need for the area is unclear. The purpose of the 2050 Regional Growth Forecast is to provide a starting point for regional planning. The forecast is not intended to be a prescription for future growth. Rather, the forecast is intended to show possible future development patterns based upon the current adopted land use plans. The Land Use element of the General Plan summarizes the role and responsibility of the General Plan and community plans. It states: “As community plans designate land uses and assign densities, they must preserve or increase planned capacity of residential land uses to ensure

C18-7 (cont.)

compliance with the City's regional share goal" (pLU-22). Therefore, implementation of community plans should maintain or increase overall housing capacity. The proposed land uses and zoning in North Park is provided consistent with the City of Villages strategy. The focus of the North Park and Golden Hill CPUs is to guide land use within these communities. The need for housing near the Golden Triangle, as suggested by the commenter, is not within the scope of the current effort, but will be considered when community plan updates proceed for those areas. The City does not agree that the proposed densities in North Park would be discriminatory. Refer also to response to comments C17-3 and B2-6.

C18-8 Comment noted.

1919 Howard Ave 92104 musician Keith Bullion 2012 Lincoln Ave 92104 biotechnology Eddie Turnbull 2006 Lincoln Ave 92104 retired Helene Goodman 4183 #2 Florida Ave 92104 teacher Al Notargiacomo 4183 Florida Ave 92104 business management Maren Costaneda Mississippi St Troy & Patty Lousiana St

--

Randi Vita, M.D.
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Letter C19

DELANO & DELANO

July 28, 2016

VIA E-MAIL & U.S. MAIL

Kurtis Steinert
Senior Environmental Planner
City of San Diego
1010 Second Ave., MS 413
San Diego, CA 92101

Re: North Park Community Plan and Draft EIR

Dear City of San Diego:

This letter is submitted on behalf of Randi Vita in connection with the proposed North Park Community Plan ("Project") and related Draft Environmental Impact Report ("EIR").

The California Environmental Quality Act ("CEQA"), Pub. Res. Code §§ 21000 – 21177, must be interpreted "so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency's decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. An EIR is "aptly described as the 'heart of CEQA'"; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

The Project would result in an increase of over 11,500 residential units and a population increase of almost 40 percent. Community Plan at 14. Additionally, the Community Plan Enhancement Program would allow substantial increases in density beyond the maximum allowed density in certain areas. *Id.* at 30. These represent substantial changes to the North Park community; unfortunately, the EIR fails to adequately analyze the impacts associated with these substantial changes.

The EIR fails to adequately analyze land use impacts. Indeed, a goal of the City's Climate Action Plan ("CAP") – "Promote effective land use to reduce vehicle miles traveled" – is implemented by Action 3.6: "Implement transit-oriented development within Transit Priority Areas." CAP at 39. Furthermore, the General Plan's Strategic

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Please refer to response to comment letter B2.

Framework Element provides: "By directing growth primarily toward village centers, the strategy works to preserve established residential neighborhoods and open space, and to manage the City's continued growth over the long term." General Plan at SF-6. In other words, both the CAP and General Plan acknowledge the appropriateness of encouraging development in areas of employment and transit simultaneously preserves existing neighborhoods and open space while reducing greenhouse gas emissions. Yet the Community Plan does not guarantee such growth and development. Section 2.3 of the Community Plan does reference "key corridors," but there is no reference to Transit Priority Areas. *Id.* at LU-38 – 39. Nor is any consideration given to the fact that several areas currently do not have transit meeting the definition of a Transit Priority Area (a copy of an April 11, 2016 letter from Dave Potter on this issue is attached and hereby incorporated by reference). The EIR fails to acknowledge the impacts associated with development that is inconsistent with the CAP and General Plan requirements.

Also, the EIR fails to consider shade and shadow impacts, despite the fact that it would result in an increase in multi-family residential units of over 12,000 units. Community Plan at 14.

The EIR fails to adequately analyze Environmental Justice impacts. The Project would lead to the displacement of substantial numbers of low-income populations and communities of color. The increases in residential units and the Community Plan Enhancement Program would eliminate existing affordable housing.

The EIR fails to adequately analyze historic resources impacts. The increases in residential units and the Community Plan Enhancement Program would eliminate existing historic housing.

The EIR fails to adequately analyze traffic impacts. The EIR acknowledges that the Project would result in significant impacts. EIR at 6.3-48. Indeed, many intersections, roadway segments and ramps are operating at LOS E or worse. SB743 will soon be a requirement for California. The study does not provide for a Vehicle Miles Traveled ("VMT") analysis. A project of this size should include a VMT calculation at a minimum.

The EIR notes that the traffic study recommended 33 "improvements that would mitigate or reduce roadway segment and intersection impacts." EIR at 6.3-44. And the traffic study notes (p. 6-1) that the recommended mitigation "would restore operations to LOS D or better at all locations." However, the EIR notes that only three mitigation measures were adopted, but there is no showing that such mitigation is infeasible. And it further notes that "the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring." EIR at 6.3-48. CEQA's "substantive mandate" requires agencies to refrain from approving projects with significant effects where there are feasible mitigation measures or alternatives that can lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4th 105, 134. "[T]he Legislature has

[] declared it to be the policy of the state 'that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects ….'" *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 597 – 98 (citations omitted).

The EIR and traffic study fail to analyze impacts after mitigation for freeway segments and ramp meters. However, the traffic study (p. 6-1) acknowledges that "none of the freeway impacts would be fully mitigated by the" Project. Again, there is no analysis of feasible mitigation to address these impacts.

The EIR acknowledges significant air quality impacts. EIR at 6.4-4. But it fails to consider mitigation that would reduce these impacts below significance, such as consideration of alternative strategies to reduce air pollution. EIR at 6.4-16.

Additionally, the EIR acknowledges "an adverse impact because of the population-base park land deficit," but claims "impacts to land use would be less than significant." EIR at 6.12-12. However, the Community Plan acknowledges the "General Plan standard is to provide a minimum of 2.8 usable acres of public park land per 1,000 residents." Community Plan at 119. It states that existing parks and "park equivalencies" constitute 16.37 acres. *Id.* The Community Plan projects additional park land and "park equivalencies" of 104.82 acres, but the Project still results in a shortage of over 100 acres. *Id.* In other words, at build-out, the Project would result in slightly less than one-half of the General Plan minimum standard for park land. There is no legitimate way to characterize this as anything other than a significant impact. Indeed, where on-the-ground conditions are severe, the "relevant question" is whether the project's additional impacts will be significant "in light of the serious nature" of the existing problems. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718.

And the EIR fails to consider adequate and feasible mitigation for such impacts. In fact, it specifically acknowledges that "proposed fees are not designed to fully fund and address the parkland deficit." EIR at 6.12-12.

The EIR's discussion of impacts to public services and facilities is likewise flawed, as it fails to acknowledge the significant impacts associated with failing to meet the minimum park land standard.

The EIR fails to adequately analyze greenhouse gas emission impacts. On April 29, 2015, Governor Brown issued Executive Order B-30-15, which establishes a "new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 …." The EIR does not address compliance with Executive Order B-30-15. *See also Center for Biological Diversity v. Dept. of Fish and Wildlife* (2015) 62 Cal.4th 204, 229.

The EIR fails to adequately analyze water supply impacts. There is an inadequate showing of water supply for the Project. The California Supreme Court recently identified three "principles for analytical adequacy under CEQA": (1) "CEQA's informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to a problem of supplying water to a proposed land use project"; (2) "an adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years"; and (3) "the future water supplies identified and analyzed must bear a likelihood of actually proving available …. An EIR for a land use project must address the impacts of likely future water sources, and the EIR's discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability." *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 430 – 32 (emphasis in original) (citations omitted). The EIR fails to comply with these mandates.

The EIR fails to adequately analyze growth inducement impacts. The EIR claims the Project would not result in growth inducement because "the proposed CPU areas will grow whether or not the proposed" Project is adopted. EIR at 9-3. But this statement conflicts with the analysis of alternatives, which specifically acknowledges that the Lower-Density Alternative would "result in approximately 1,700 fewer units and a population decrease of approximately 3,150 compared to the proposed" Project. *Id.* at 11-18.

CEQA requires that an EIR "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750 – 51. "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." CEQA Guidelines § 15126.6(b). "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 404. The EIR fails to comply.

CEQA contains a "substantive mandate" that agencies refrain from approving a project with significant environmental effects if "there are feasible alternatives or mitigation measures" that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4th 105, 134; Pub. Res. Code § 21002. It "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects." *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. Here, the EIR claims the Lower-Density Alternative meets most of the Project objectives while being the environmentally superior alternative. EIR at 11-25.

However, the Environmental Justice Alternative would accomplish far more and create even less negative environmental impacts.

The EIR fails to propose feasible mitigation and alternatives that can lessen or avoid the significant Project impacts. *City of Marina v. Board of Trustees of the California State Univ.* (2006) 2006 39 Cal.4th 341, 360; *see also* CEQA Guidelines § 15126.6(b). For example, the EIR acknowledges significant traffic impacts because the timing of traffic improvements is unknown. EIR at 6.3-48. But the EIR fails to consider requiring the timing of aspects of Project development to await the construction of necessary traffic improvements.

Furthermore, the Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Project. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455.

The EIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

For the foregoing reasons, Ms. Vita urges you to reject the Project and EIR as drafted. Thank you for your consideration of these concerns.

Sincerely,

Everett DeLano

Enc.

Attachments to Letter C19

Everett DeLano

From: NOTICE <davidapott@aol.com>
Sent: Monday, April 11, 2016 11:59 AM
To: kevinfaulconer@sandiego.gov; davidalvarez@sandiego.gov
Cc: sherrilightner@sandiego.gov; ToddGloria@sandiego.gov.; loriezapf@sandiego.gov; myrtlecole@sandiego.gov.; MarkKersey@sandiego.gov; ChrisCate@sandiego.gov; scottsherman@sandiego.gov; martiemerald@sandiego.gov; joe.lacava@gmail.com; murphyj@sandiego.gov; nsbragado@sandiego.gov
Subject: Climate Action Plan Transit Priority Area Map
Attachments: LTR TPA.pdf; _Certification_.htm

Dear Mayor Faulconer and Councilmember Alvarez:

As a planning consultant (and former Deputy Planning Director) in San Diego since 1968 and as a resident, I strongly support the strategies to achieve attainable greenhouse gas reduction targets established by the adopted Climate Action Plan (CAP) and the creation of the CAP implementation Working Group. I also support the adopted Strategic Framework Element of the General Plan. These two documents together will guide San Diego's growth in the future.

Of prime interest was the Transit Priority Area (TPA) Map included as Attachment B in the CAP. This map, along with the Strategic Framework Element, will serve during the initial phase of locating villages with high-density housing and mixed use.

A cursory review of the TPA Map, however, identified areas that do not comply with Section 21099 and 21064.3 of the California Public Resources Code; these sections were established as the basis for the Transit Priority Area Map.

Based on my finding during the cursory review, I undertook a more detailed evaluation of a number of other Transit Priority Areas.

The results of that evaluation are included in the attached letter. Please review and contact me if you have any questions.

Thank you for your courteous attention.

Sincerely,

David A. Potter
4975 Milton Street
San Diego, CA 92110
(619) 275-5120

1

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VIA E-MAIL

April 11, 2016

Mayor Kevin L. Faulconer
City of San Diego
City Administration Building
202 C Street, 11th Floor
San Diego, CA 92101

Councilmember David Alvarez, District 8
Chair, CAP Implementation Working Group
City of San Diego
City Administration Building
202 C Street, 10th Floor
San Diego, CA 92101

Re: Climate Action Plan Transit Priority Area Map

Dear Mayor Faulconer and Councilmember Alvarez:

As a planning consultant (and former Deputy Planning Director) in San Diego since 1968 and as a resident, I strongly support the strategies to achieve attainable greenhouse gas reduction targets established by the adopted Climate Action Plan (CAP) and the creation of the CAP implementation Working Group. I also support the adopted Strategic Framework Element of the General Plan. These two documents together will guide San Diego's growth in the future.

Of prime interest was the Transit Priority Area (TPA) Map included as Attachment B in the CAP. This map, along with the Strategic Framework Element, will serve during the initial phase of locating villages with high-density housing and mixed use.

A cursory review of the TPA Map, however, identified areas that do not comply with Section 21099 and 21064.3 of the California Public Resources Code; these sections were established as the basis for the Transit Priority Area Map.

Based on my finding during the cursory review, I undertook a more detailed evaluation of a number of other Transit Priority Areas.

Basis for the Transit Priority Area Map

A key land use strategy of the CAP is to reduce vehicle miles traveled by locating a majority of all new residential development within Transit Priority Areas. The CAP defines Transit Priority Area and Major Transit Stop as follows:

> SB 743 established Section 21099 of the California Public Resources Code (CPRC), which states: "Transit priority area" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."
>
> Major Transit Stop, as defined in CPRC Section 21064.3, means: a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes each having a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods.

According to the CAP the Transit Priority Area (TPA) Map included as Appendix B is based on the adopted SANDAG 2050 Regional Transportation Plan (RTP).

Resources Consulted

In reviewing the Transit Priority Area Map, the following resources were consulted:

Existing Transit

- Existing Bus Routes: http://www.sdmts.com/schedules-real-time-maps-and-routes/bus-routes
- Existing Trolley: http://www.sdmts.com/schedules-real-time-maps-and-routes/trolley

Planned Transit

- Future Transit: SANDAG 2050 Regional Transportation, Figure 1.1 2050 Revenue Constrained Transit Network, page 2-7
- Future High Frequency Bus Service: SANDAG 2050 Regional Transportation Plan, Figure A.7 2035 High Frequency Local Bus Routes, page A-45.

Areas Not Qualifying for Transit Priority Area

A review of the areas shown in Attachment B revealed a number of areas around intersecting bus routes that do not qualify as a Transit Priority Area. The primary reason these areas do not qualify is because one or both bus routes do not have a frequency of service of 15 minutes or less

during the morning and afternoon peak commute periods. These areas should not be identified as a Transit Priority Area and should be deleted from Attachment B. See areas enclosed in red on the attached map and identified by the corresponding number.

Non-qualifying areas are discussed below.

- # 1 - *Route 50 / 105 Intersect (Clairemont Drive and Burgener Boulevard)*

  The Transit Priority Area Map designates the area around Clairemont Drive and Burgener Boulevard as a Transit Priority Area. However, under current conditions neither Route 50 nor the intersecting Route 105 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have a high frequency of service in the future.

- # 2 - *Route 105 / Route "Not Numbered" Intersect (Clairemont Mesa Boulevard and Moraga Avenue)*

  The Transit Priority Area Map designates the area around Clairemont Mesa Boulevard and Moraga Avenue as a Transit Priority Area. Under current conditions the "Not Numbered" Route on Moraga does not exist and the intersecting Route 105 does not have a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," the "Not Numbered" Route on Moraga Avenue is slated to have a high frequency of service in the future; however, Route 105 is not slated to have a high frequency of service in the future.

- # 3 - *Route 41 / Route 105 Intersect (Governor Drive and Genesee Avenue)*

  The Transit Priority Area Map designates the area around Governor Drive and Genesee Avenue as a Transit Priority Area. However, under current conditions neither Route 41 nor the intersecting Route 105 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have a high frequency of service in the future.

- # 3.1 - *Genesee Avenue Between Rose Canyon and South of Route 52*

  There are no qualifying areas along Genesee Avenue between Rose Canyon on the north and ½ mile north of Clairemont Mesa Boulevard on the south. Furthermore, this area encompasses Rose Canyon and San Clemente Canyon (Marian Bear Park), which are preserved as dedicated open space where no residential uses are permitted.

- # 4 - *Route 83 / Route 10 Intersect (Washington Street and Hawk Street)*

  The Transit Priority Area Map designates the area around Washington Street and Hawk Street as a Transit Priority Area. Under current conditions Route 10 does have a frequency of service of 15 minutes during the morning and afternoon peak commute periods and will continue to do so in the future. However, Route 83 has a frequency of service of one hour during the morning and afternoon peak commute periods, and according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," the route is not slated to have a high frequency of service in the future.

- # 5 - *Route 854 / Route 115 Intersect (Lake Murray Boulevard and Jackson Drive)*

  The Transit Priority Area Map designates the area around Lake Murray Boulevard and Jackson Drive as a Transit Priority Area. However, under current conditions neither Route 854 nor the intersecting Route 115 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have a high frequency of service in the future.

- # 6 - *Route 854 / Route 115 Intersect (Lake Murray Boulevard and Navajo Road)*

  The Transit Priority Area Map designates the area around Lake Murray Boulevard and Navajo Road as a Transit Priority Area. However, under current conditions neither Route 854 nor the intersecting Route 115 have a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. And according to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," neither route is slated to have high frequency of service in the future.

- # 7 - *Route 35 / Route 923 Intersect (Cable Street and Voltaire Street)*

  The Transit Priority Area Map designates the area around Cable Street and Voltaire Street as a Transit Priority Area. Under current conditions Route 35 has a frequency of service of 15 minutes during the afternoon peak commute period but not during the morning peak commute period. The intersecting Route 115 does not have a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," Route 35 is slated to have a high frequency of service in the future; however, Route 923 is not slated to have a high frequency of service in the future.

- # 8 - *Route 28 / Route 84 Intersect (Rosecrans Street and Canon Street)*

  The Transit Priority Area Map designates the area around Rosecrans Street and Canon Street as a Transit Priority Area. Under current conditions neither Route 28 nor the

intersecting Route 84 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," Route 28 is slated to have high frequency of service in the future; however, Route 84 is not slated to have a high frequency of service in the future.

- # 9 - *Route 28 / Route 923 Intersect (Rosecrans Street and Nimitz Boulevard)*

  The Transit Priority Area Map designates the area around Rosecrans Street and Nimitz Boulevard as a Transit Priority Area. Under current conditions neither Route 28 nor the intersecting Route 923 has a frequency of service of 15 minutes or less during the morning or afternoon peak commute periods. According to the 2050 RTP, and specifically Figure A.7 "2035 High Frequency Local Bus Routes," Route 28 is slated to have a high frequency of service in the future; however, Route 923 is not slated to have a high frequency of service in the future.

- # 10 - *Rosecrans Street Between Canon Street and Midway Drive*

  Based on the determination that Route 28 / Route 84 Intersect and Route 28 / Route 923 Intersect are not Major Transit Stops, there should be no designation of Transit Priority Area on Rosecrans Street between ½ mile southwest of Canon Street and ½ mile southwest of Midway Drive.

This was not a comprehensive evaluation of all of the Transit Priority Areas; hence, there may also be other non-qualifying areas.

Other Areas Not Qualifying for Transit Priority Area by Virtue of Their Location

There are intersecting bus lines and transit stops that meet the technical definition of a Major Transit Stop; however, they do not further the cause of reducing greenhouse gas emissions because of their inability to support housing at that particular location. These areas should not be identified as a Transit Priority Area and should be deleted from Attachment B. See areas enclosed in red on the attached map and identified by the corresponding letter.

Areas not qualifying by virtue of location are discussed below.

- A - *Route 8 / Route 9 Intersect (Ingraham Street and West Mission Bay Drive/Sea World Drive)*

  This Major Transit Stop is located with Mission Bay Park where housing is neither proposed nor permitted.

- B - *Transit Stop #1 in Balboa Park*

  This Major Transit Stop is located on Park Boulevard at President's Way in Balboa Park where housing is neither proposed nor permitted.

- C - *Transit Stop #2 in Balboa Park*

  This Major Transit Stop is located on Park Boulevard at the Zoo in Balboa Park where housing is neither proposed nor permitted.

- D – *Harbor Drive Between Pacific Highway and Harbor Island Drive*

  San Diego International Airport is on the north side of Harbor Drive, and port lands are on the south side of Harbor Drive. Housing is neither permitted nor proposed in either area.

- E – *Old Town San Diego State Historic Park*

  Although located adjacent to the Old Town Transit Center, the State Historic Park is intended to preserve and recreate the Mexican and early American periods. High-density housing is not compatible with the historic character of the Park.

- F – *East Side of Sixth Avenue between Upas Street and I-5*

  This area is located in Balboa Park where housing is neither proposed nor permitted.

Consequences of Including Non-qualifying Transit Priority Areas

Increasing density in areas that are not consistent with the definition of transit priority area and major transit stop would be contrary to the CAP goal, which is to promote effective land use to reduce vehicle miles traveled for the purpose of reducing greenhouse gas emissions. In fact, it would have just the opposite effect by promoting growth and increased auto use in areas not sufficiently served by transit. Furthermore, land use planning under the Strategic Framework Element would be faulty if transit is inaccurately characterized.

Showing Transit Priority Areas in areas where housing is either not proposed or permitted creates a distorted view of where growth should occur.

Recommendations

The following measures are recommended to update the Transit Priority Area Map.

- Reevaluate each and every Transit Priority Area as shown on the map in Appendix B, correct the errors, and publish a revised version.
- Include the following notation on the revised version of the Transit Priority Area Map in Appendix B:

  "See larger scale, community-specific Transit Priority Areas in updated community plans."
- Work with community planning staff and prepare larger scale community-specific Transit Priority Area Map to be included in each updated community plan.

In practice, of course, it will be necessary to do more that just identify the "availability" of transit. Truly assessing a reduction in vehicle miles traveled would include (among other things): assessing when and how transit is actually used, whether there are practical incentives to encourage transit usage, and whether the land uses that are proposed for a particular area provide an appropriate mix of uses that would allow transit to be truly effective.

I hope this letter serves to improve the effectiveness of the Climate Action Plan. Please contact me if you have any questions.

Thank you, and I look forward to hearing about efforts undertaken to update the Transit Priority Area Map.

Sincerely,

David A. Potter, AICP

cc: Council President Sherri Lightner (D1)
Councilmembers Zapf (D2), Gloria (D3), Cole (D4), Kersey (D5), Cate (D6), Sherman (D7), and Emerald (D9)
Jeff Murphy, Planning Director
Nancy Bragado, Deputy Director
Joe LaCava, Community Advocate, CAP Implementation Working Group

Attachment: Transit Priority Area Map with Non-Qualifying Areas Enclosed in Red



TRANSIT PRIORITY AREA MAP - Unqualified Areas Enclosed in Red

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A: Notice of Preparation and Comment Letters
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B-2: North Park & Uptown Updated Residential Densities Traffic Evaluation Summary of Findings for the Cluster Community Plan Update
C: Uptown, North Park, and Golden Hill Community Plan Update Mobility Study for Future (2035) Conditions
D: Air Quality Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates
E-1: Greenhouse Gas Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates
E-2 Supplemental Analysis to the Greenhouse Gas Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates
F: Noise Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates
G-1: Community Plan Update for the Community of Greater North Park Prehistoric Cultural Resources
G-2: North Park Community Plan Area Historic Resources Survey
H: Biological Resources Report for the Uptown, North Park, and Golden Hill Community Plan Updates
I: Program EIR-Level Geotechnical Report – Uptown, North Park, and Greater Golden Hill Planning Areas
J: Correspondence with Public Service Providers
K-1: Water Supply Assessment – North Park
K-2: Water Supply Assessment – Golden Hill
L: Geotracker Report
M-1: Community Plan Update for the Community of Greater Golden Hill Prehistoric Cultural Resources
M-2: Golden Hill Community Plan Area Historic Resources Survey

List of Abbreviated Terms

°F	degrees Fahrenheit
µg/m3	micrograms per cubic meter
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACOE	U.S. Army Corps of Engineers
ADA	Americans with Disabilities Act
ADT	average daily traffic
AFY	acre-feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
APCD	Air Pollution Control District
APS	Alternative Planning Strategy
~~ART~~	~~Arterial Rapid Transit~~
Basin Plan	Water Quality Control Plan for the San Diego Basin
BAU	business as usual
BMP	best management practice
~~B~~BRT	~~bus~~ rapid transit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
Cal EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire
CalARP	California Accidental Releases
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CASAC	Clean Air Scientific Advisory Committee
CBC	California Building Code
CCAP	U.S. Climate Change Action Plan

CCC	California Coastal Commission
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CH_4	Methane
CIP	Capital Improvement Project
City	City of San Diego
City BMP	City of San Diego Bicycle Master Plan
CNDDB	California Natural Diversity Data Base
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CO_2	Carbon dioxide
CPU	Community Plan Update
CPUAC	Community Plan Update Advisory Committee
CPUC	California Public Utilities Commission
CRC	California Residential Code
CRHR	California Register of Historic Resources
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dB(A)	A-weighted decibels
DIF	Development Impact Fees
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
du/ac	dwelling units per acre
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning Community Right-to-Know Act
ESA	Endangered Species Act
ESA	Environmental Site Assessment
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration

GHC	Geologic Hazard Category
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
gdp	gallons per day
H&SC	California Health and Safety Code
HAs	Hydrologic Areas
HAZMIT	2010 San Diego County Multi-Jurisdictional Hazard Mitigation Plan
HCH	hexachlorocyclohexane
HFC	hydrofluorocarbons
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
HMTA	Hazardous Materials Transportation Act
HOV	High Occupancy Vehicle
HRB	Historical Resources Board
HSAs	Hydrologic Subareas
HUs	Hydrologic Units
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I-5	Interstate 5
I-8	Interstate 8
I-805	Interstate 805
ICLEI	International Council for Local Environmental Initiatives
IFS	Impact Fee Studies
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
ITS	Intelligent Transportation Systems
IWRP	Integrated Water Resources Plan
IWRP	Integrated Water Resources Plan
JRMP	Jurisdictional Runoff Management Plan
JURMP	Jurisdictional Urban Runoff Management Program
kHz	kilo-Hertz
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Plan
LCPA	Local Coastal Plan Amendment
LCS	lead-containing surfaces
LDC	Land Development Code
LDM	Land Development Manual
L_{dn}	day-night equivalent level
L_{eq}	Average sound level
LEV III	Low Emission Vehicle III
LID	Low Impact Development

LOS	Level of Service
Lpw	sound power
LRA	Local Responsibility Area
LRT	light rail transit
LUE	Land Use Element
LUP	Land Use Plan
LUST	leaking underground storage tanks
MBTA	Migratory Bird Treaty Act
MHCP	Multiple Habitat Conservation Program
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MMRP	Mitigation Monitoring and Reporting Program
MMT CO_2E	million metric tons of CO_2 equivalent
MOE	measurement of effectiveness
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organizations
MSCP	Multiple Species Conservation Program
MSL	mean sea level
MS4	Municipal Separate Storm Sewer System
MT CO_2E	metric tons of CO_2 equivalent
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWh	megawatt hour
N_2O	Nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCHRP	National Cooperative Highway Research
NCP	National Contingency Plan
NCWRP	North City Water Reclamation Plant
NDP	Neighborhood Development Permit
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHTSA	National Highway Traffic and Safety Administration
NMFS	National Marine Fisheries Service
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRC	Nuclear Regulatory Commission
NRHP	National Register of Historic Places
O_3	ozone

OES	Office of Emergency Services
OES	Office of Emergency Services
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PAHS	polynuclear aromatic hydrocarbons
pb	lead
PCB	polychlorinated biphenyls
PCBs	polychlorinated biphenyls
PCE	Tetrachloroethylene
PDO	Planned District Ordinance
PDP	Planned Development Permit
PEIR	Program Environmental Impact Report
PFC	perfluorocarbons
PLWTP	Point Loma Wastewater Treatment Plan
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
pphm	parts per hundred million
ppm	parts per million
PPV	peak particle velocity
PRD	planned residential developments
PSE	Public Safety Element
PUD	Public Utilities Department
PWD	Public Works Department
RAC	Regional Advisory Committee
RAQS	Regional Air Quality Strategy
RBP	Regional Bicycle Plan
RCP	Regional Comprehensive Plan
RCRA	Federal Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RM	Ready Made
RME	Resource Management Element
ROG	Reactive organic gas
RPS	Renewable Portfolio Standard
R~~T~~TP	Regional ~~Transportation~~ Plan
RT	rapid transit
RUWMP	Regional Urban Water Management Plan
RWMG	Regional Water Management Group
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Mitigation
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act

SB	Senate Bill
SBWRP	South Bay Water Reclamation Plant
SCAB	South Coast Air Basin
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SDPL	San Diego Public Library
sec/veh	seconds per vehicle
sf	square feet
SF_6	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SNPMS	Sustainable North Park Main Street
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SOI	Sphere of Influence
SR-15	State Route 15
SR-163	State Route 163
SR-94	State Route 94
SSMP	Sewer System Management Plan
SSO	Sanitary Sewer Overflows
STAA	Surface Transportation Assistance Act
STC	sound transmission class
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	storm water pollution prevention plan
SWRCB	State Water Resources Control Board
T&SW	Transportation and Storm Water Department
TAC	toxic air contaminants
TAIC	Technology Associates International Corporation
TCM	transportation control measures
TDM	Transportation Demand Management
TDS	total dissolved solid
TDS	total dissolved solids
TERPS	Terminal Instrument Procedures
TMDL	total maximum daily loads
TPA	Transit Priority Area
TSS	Threshold Siting Surface
U.S. DOT	U.S. Department of Transportation

U.S.C.	United States Code
UDC	Unified Disaster Control
URMP	Urban Runoff Management Plan
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
v/c	volume to capacity
VMT	vehicle miles travelled
VOC	volatile organic compounds
WMP	Waste Management Plan
WQIP	Water Quality Improvement Plans
WRCC	Western Regional Climate Center
WSA	Water Supply Assessment



Executive Summary

S.1 Proposed Project

Project Location and Setting

The North Park and Golden Hill Community Plan Update (CPU) areas are centrally located to the north and east of Downtown San Diego and south of the Mission Valley community. The North Park Community Plan area forms a portion of the northern and eastern boundaries of Balboa Park; while the Golden Hill Community Plan area forms portions of the Park's eastern and southern boundaries.

The North Park Community Plan area (North Park community or North Park) comprises approximately 2,300 acres (approximately 3.6 square miles) and is located in the central portion of the City of San Diego and is in close proximity to Downtown San Diego. North Park abuts the community planning areas of Uptown on the west, Mission Valley on the north, Mid-City on the east, and Golden Hill and Balboa Park on the south. North Park is defined by its mesa tops with canyon and hillside areas. The majority of North Park is relatively flat or gently sloping with pronounced hillside areas located in the northern boundary of the community adjacent to Mission Valley and the southeastern portion of the community adjacent to Golden Hill. North Park contains the neighborhoods of Altadena, Burlingame, Montclair, North Park, and University Heights.

The Golden Hill Community Plan area (Golden Hill community or Golden Hill) is an urbanized community consisting of approximately 750 acres (approximately 1.2 square miles), located east of downtown San Diego and adjacent to Balboa Park. It comprises the Golden Hill and South Park neighborhoods. The Golden Hill community boundary is Balboa Park and Juniper Street on the north, 32nd Street between Juniper Street and Hawthorn Street, then along Marlton Drive to the 34th Street canyon to Beech Street on the east, State Route (SR) 94 on the south and I-5 on the west.

Project Description

The projects analyzed in this Draft Program EIR include the North Park and Golden Hill Community Plan Updates (CPUs). The existing North Park and Golden Hill Community Plans were last updated in 1986 and 1988, respectively. The proposed updates will ensure consistency of the CPUs with and incorporate relevant policies from the City of San Diego General Plan (General Plan), as well as provide a long-range, comprehensive policy framework and vision for growth and development in the two communities through 2035.

Included in each CPU are village districts; amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; amendments to the Land Development Code and maps; and comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new impact fee study for each CPU. The CPUs and associated regulatory documents form the "project" for this PEIR.

Taken together, the overall vision of the North Park and Golden Hill Community Plans is to guide, over the next 20 to 30 years, future infill development that is transit supportive per the General Plan and is also protective of desired community character and resources. The proposed land use plans locate the highest intensity land uses within each community along transit corridors where existing and future commercial, residential and mixed-use development can support existing and planned transit investments. Residential density is proposed to be increased from the adopted plans in some areas and, within Golden Hill, reduced in some areas to help achieve these objectives.

The Land Use Elements define Village Districts and key corridors where future growth is targeted within both communities in order to fulfill the General Plan's City of Villages strategy. While the proposed CPUs set forth procedures for implementation, they do not on their own establish regulations or legislation, nor do they, on their own, rezone property. Controls on development and use of public and private property including zoning, development regulations, and implementation of transportation improvements are included as part of the CPUs.

The Golden Hill Community Plan contains nine elements and an Introduction and Implementation section, and includes the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation, and Historic Preservation.

The North Park Community Plan contains ten elements and an Introduction and Implementation chapter, and includes the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Sustainability and Conservation, Noise and Light, Historic Preservation; and Arts and Culture.

Technical and planning studies have been prepared and considered in the development of the CPUs, including planning and land use documents, master plans, and technical documents addressing a range of issues. The CPUs are also intended to ensure consistency with the overall guiding principles, land use policies, and other goals found in the City's General Plan. The CPUs' process requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; adoption of a Land Development Code ordinance that would repeal the Golden Hill Planned District Ordinance (GHPDO) zoning; amend the

Mid-City Planned District Ordinance (MCPDO) to remove North Park from the regulations; and replace rezone areas within the CPUs with Citywide zones contained within the Land Development Code (LDC); adopt land development code amendments to allow for conformance with the community plan policies; and a comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new impact fee study for each community.

S.2 Project Objectives

In accordance with CEQA Guidelines Section 15124, the following objectives were identified to outline the underlying purpose for the project. These objectives will be used to assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this PEIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. The primary objectives for the project are:

- Develop a Multi-Modal Transportation Strategy to include walkable and bicycle friendly streets, and accessible and enhanced transit options.
- Maintain or increase the housing supply through the designation of higher residential densities focusing along major transit corridors.
- Provide for increased economic diversification through land use to increase employment and economic growth opportunities.
- Preserve the neighborhood character and design relationships between neighborhoods within each community through the development of transitions and design policies.
- Identify significant historic and cultural resources within each community and provide for their preservation, protection and enhancement.
- Provide increased recreation opportunities and new public open spaces.
- Preserve, protect and enhance each community's natural landforms, including canyons and environmentally sensitive lands.
- Include financing strategies that can secure infrastructure improvements concurrent with development.

S.3 Areas of Controversy

The community has voiced concerns with the CPUs, particularly regarding the North Park CPU's provision of higher density zoning within the Pedestrian Oriented Infill Development Enhancement Program area, and the potential for higher density housing to affect historical resources and the historic quality of neighborhoods, as well as local traffic congestion and safety. ~~Although there are no clear-cut areas of controversy, e~~Environmental impacts classified as significant and unavoidable that may generate controversy have been identified in the resource topics of traffic and transportation, air quality (North Park only), noise, historical resources, and paleontological

resources services, which are described in Chapters 6.3 and 7.3, 6.4, 6.6 and 7.6, 6.7 and 7.7, and 6.10 and 7.10, respectively.

S.4 Project Alternatives

In order to fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the state CEQA Guidelines requires the discussion of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project," even if these alternatives would impede to some degree the attainment of the project objectives.

Alternatives to the proposed CPUs are evaluated in Chapters 11 and 12 of this PEIR for the North Park and Golden Hill CPUs, respectively. The evaluations analyze the ability of each alternative to further reduce or avoid significant environmental effects of the proposed CPU. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis. This PEIR evaluates three alternatives to the North Park CPU and three alternatives to the Golden Hill CPU. The North Park community plan update considers: (1) No Project Alternative (continuation of the Adopted Community Plan); (2) Higher Density Alternative; and (3) Lower Density Alternative. The Golden Hill community plan update considers: (1) No Project Alternative; (2) Higher Density Alternative; and (3) Lower Density Alternative.

North Park CPU

No Project Alternative (Adopted Community Plan)

Under the No Project Alternative, the adopted North Park Community Plan would continue to guide development. Last updated in 1986, the adopted Community Plan identifies the following issues that are the most important to be addressed in the community plan through policies and regulations:

- Neighborhood conservation and preservation of existing single-family housing stock.
- Housing rehabilitation.
- Revitalization and consolidation of the retail commercial areas.
- Preservation of open space.
- Expansion and enhancement of public transit opportunities through the establishment of strong public transit links with downtown and adjacent communities.
- Improvement in recreational opportunities for the residents of the community.

- Establishment of urban design standards and criteria for the entire community to guide future development.

- Establishment of a canyon and hillside fire prevention program.

- Establishment of mixed land uses in appropriate areas to improve land utilization and encourage redevelopment.

- Preservation of community character and historical, architectural and cultural resources.

- Establishment of consistency between zoning, land use recommendations and adequacy of public facilities.

- Enhancement of school facilities.

- Ability of the community to accommodate new development based upon zoning, the availability of public facilities and growth management policies.

- Establishment of a comprehensive community plan implementation program which will be undertaken concurrently with or subsequent to the adoption of the community plan.

The adopted Community Plan land use designations seek to promote a balance of land uses. The objectives are to preserve the single family areas and allow for multi-family developments in particular areas and require high-quality development to address scale and character changes and create a vital and attractive center. In North Park, the main corridors, El Cajon Boulevard and University Avenue, are identified for the highest intensity within the adopted community plan. Institutional, Education, Park and Recreation are designated for City-owned and other public/quasi-public facilities. The proposed Community Plan would maintain land use designations generally consistent with the adopted Community Plan.

Areas of proposed land use change are concentrated along Park and El Cajon Boulevards which are identified as part of the Transit-Oriented Development Enhancement Program area. ~~Where t~~The proposed Plan would generally facilitate higher intensity mixed-use development compared to the existing Community Plan. The Enhancement Area would permit with the use of the PDP Process 4 higher building heights and densities than those in the adopted Community Plan. The proposed Plan would also include policies to develop additional commercial development along University Avenue and 30th Street which are also served by transit. In addition, the proposed Pedestrian-Oriented Infill Development Enhancement Program would allow applicants with existing development projects of six units or more in applicable multi-family residential areas between Lincoln Avenue and Howard Avenue to request a density bonus. Although the number of single family residents and multi-family development would remain similar to that of the adopted Community Plan with the use of mixed-use developments within the ~~Transit Oriented~~ Enhancement Program Areas and other corridors, the anticipated population at buildout of the Proposed Community Plan would be approximately 4,600 persons more than the population of the adopted Community Plan.

Higher-Density Alternative

The Higher-Density Alternative utilizes the proposed North Park CPU and increases intensity within specific commercial nodes. The node locations and associated density increases beyond the proposed North Park CPU are:

1) Along 30th North Park Way to Upas (up to 44 du/ac)
2) Meade to Madison (up to 109 du/ac)
3) Along 30th Madison to Adams (up to 73 du/ac)
4) Along Adams between Kansas and Hamilton (up to 44 du/ac)
5) Along 30th at Thorn, Redwood, and Jupiter (up to 44 du/ac)
6) University between Mississippi and Louisiana (up to 44 du/ac)

The Higher-Density Alternative goes further than the proposed North Park CPU in supporting the goal of facilitating transit-oriented development and mixed use development. It expands residential capacity in select mixed-use areas near and along transit corridors. The modest increase would accommodate approximately 384 additional multi-family units in areas where residents would have convenient access to transit and commercial services.

In this Alternative, the land use designations would be the same as in the proposed North Park CPU and would also feature all the same policies as the proposed North Park CPU.

Lower-Density Alternative

The Lower-Density Alternative uses the proposed North Park CPU land uses, would not include the PDP density increase mechanism, and decreases intensity in the central multi-family area. This Alternative maintains the proposed North Park CPUs focus to create walkable areas with mixed use development along transit corridors and within commercial nodes. However, the density of future development would be lower under this alternative, resulting in less overall development near these facilities. The Lower Density Alternative would result in approximately 1700 fewer units than the proposed North Park CPU.

The Community Plan Enhancement Program, which allows development projects to request increased densities in specific areas, would not be included with this alternative. The main reduction in density would occur in the residential neighborhood between El Cajon Blvd and University Avenue. Residential densities would be designated for 16-29 du/ac in the central residential area and 30-44 du/ac for properties abutting the commercial corridors. The other intensity reductions would occur with the removal of the discretionary process 4 PDP density increase tool proposed with the proposed plan. The Medium High Residential zone would not be allowed to increase from a maximum 44 du/ac to 73 du/ac and within commercial areas along Park Blvd from 73 du/ac to 145 du/ac and El Cajon Blvd. from 109 du/ac to 145 du/ac.

The Lower Density Alternative would scale back the allowed density in both the central residential and mixed use areas of the community. The rest of the community would mirror the proposed

North Park CPU and the Lower-Density Alternative would also feature all the same policies as the proposed North Park CPU.

Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the proposed North Park CPU goals and objectives, the Lower-Density Alternative ~~re~~ is ~~no~~ the environmentally superior alternative as compared to the proposed North Park CPU for this Program EIR. While the Lower-Density Alternative does reduce impacts to Visual Effects, Transportation and Traffic, Air Quality, Noise, Historical Resources, and Paleontological Resources as compared to the North Park Community Plan, the Lower-Density Alternative would still result in significant and unavoidable impacts to Transportation and Traffic, Noise, Historical Resources and Paleontological Resources. Furthermore, the Lower-Density Alternative does not support the full implementation of the General Plan's City of Villages Strategy of developing multi-modal centers that encourage walking, bicycling, and taking transit and contain a mixture of commercial and residential development. The Lower-Density Alternative would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be potentially significant for the Lower-Density Alternative.

Golden Hill CPU

No Project Alternative (Adopted Community Plan)

Under the No Project Alternative, the adopted Golden Hill Community Plan would continue to guide development. Last updated in 1988, the adopted Community Plan identifies the following issues that are the most important to be addressed in the community plan through policies and regulations:

- Achieving conformance between zoning and community plan land use designations.
- Preservation of community scale, character/ historical and architectural resources.
- Preservation of single-family and low-density neighborhoods.
- Clustering of high density residential development along transit corridors.
- Revitalization of commercial areas.
- Preservation of open space.
- Elimination of land use conflicts.
- Adoption of urban design standards for compatible housing design, streetscape improvements and commercial revitalization.

The No Project Alternative would consist of the adopted Golden Hill Community Plan land use designations as they apply today. There have been no amendments to the adopted Golden Hill Community Plan since adoption.

The majority of Golden Hill is designated for residential uses. South of A Street is primarily designated for Medium density (15-29du/ac) with higher density centering around Broadway at 29-44 and 44-73 du/ac. North of A Street is composed of Low density residential at 1-9 du/ac with modest increases in density along 30th (15-29 du/ac) and in the northeast corner of the community (10-15 du/ac).

In Golden Hill, 25th Street and 30th Street contain the community's commercial centers allowing mixed use development up to 29 du/ac. 25th Street is a four block commercial area from the 94 Freeway to B Street and 30th Street, the community's main north south corridor, contains commercial areas defined by Cedar and Beech Streets, Grape and Juniper Streets, and small neighborhood commercial lots south of A Street. A Neighborhood Commercial center is also located at 28th and B Street.

The proposed Golden Hill CPU would maintain land use designations generally consistent with the adopted Golden Hill Community Plan. There are a few areas where the proposed land uses are changing from the adopted Community Plan to reflect existing conditions such as the Neighborhood Commercial designations at 20th Street and Broadway; and 30th Street and Broadway and a reduced Community Commercial area between Beech and Cedar along 30th Street where Low Medium residential uses exist.

The residential area centered along the Broadway corridor between 26th Street and 31st Street from C Street to as far south as the 94 Freeway is proposed for Lower-Density residential uses. The proposed Golden Hill CPU increases density and allows for limited commercial at the City's operation yard located at the northwestern edge of the community and is the community's largest opportunity area. Institutional uses are identified in the proposed Golden Hill CPU. The proposed Golden Hill CPU expands the institutional uses including the fire station and Golden Hill Elementary School. The open space network is more clearly defined in the proposed plan and shows a network of canyons along the eastern side of Golden Hill.

Higher-Density Alternative

The Higher-Density Alternative utilizes the existing proposed Golden Hill CPU and increases density along the 25th Street commercial corridor and the City's Operation Yard to 44 du/ac. This Alternative goes further than the proposed Golden Hill CPU in supporting the goal of facilitating transit-oriented development and a range of housing types.

Both the Higher-Density Alternative and the proposed Golden Hill CPU allows for 44 du/ac and limited commercial at the City's operation yard located at the northwestern edge of the community. This site is the community's largest opportunity area. The proposed Golden Hill CPU expands the institutional uses including the fire station and Golden Hill Elementary School. The open space network is more clearly defined in the proposed Golden Hill and shows a network of canyons along the eastern side of Golden Hill.

Lower-Density Alternative

The Lower-Density Alternative maintains land uses which are similar to the proposed Golden Hill CPU except in two areas. The Lower-Density Alternative further lowers density along the Broadway Corridor from 30-44 du/ac to 16-29 du/ac, maintains the City's Operation Yard to 29 du/ac and does not specify limited commercial in the City's Operation Yard could be included. The proposed Community Plan focuses on creating walkable areas with mixed use development along the transit corridors and within commercial nodes. However, the density of future development would be lower under this alternative, resulting in less overall development.

Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, than another environmentally superior alternative must be identified.

Based on a comparison of the Alternatives' overall environmental impacts and their compatibility with the proposed Golden Hill CPU's goals and objectives, there is no environmentally superior alternative as compared to the proposed Golden Hill CPU for this Program EIR. While the Lower-Density Alternative does reduce impacts to Visual Effects, Transportation and Traffic, Noise, Historical Resources, and Paleontological Resources as compared to the proposed Golden Hill CPU, the Lower-Density Alternative would still result in significant and unavoidable impacts to Transportation and Traffic, Noise, Historical Resources and Paleontological Resources. Furthermore, the Lower-Density Alternative does not support the full implementation of the General Plan's City of Villages Strategy of developing multi-modal centers that encourage walking, bicycling, and taking transit and contain a mixture of commercial and residential development. The Lower-Density Alternative would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP and thus, impacts associated with GHG emissions would be potentially significant for the Lower-Density Alternative.

S.5 Summary of Significant Impacts and Mitigation Measures

Table S-1 summarizes the potentially significant environmental impacts of the proposed CPUs and proposed mitigation measures to reduce or avoid these impacts. Impacts, including analysis of cumulative impacts, and mitigation measures are organized by issue, as analyzed in Chapters 6 and 7, Environmental Analysis of North Park and Golden Hill Community Plan Updates, respectively. Detailed discussions of the impacts and proposed policies that would reduce impacts are located in those chapters of this PEIR.

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
North Park CPU and Associated Discretionary Actions			
Land Use			
Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?	The proposed North Park CPU and associated discretionary actions are consistent with the General Plan and the City of Villages strategy. Furthermore, the policies developed for the proposed North Park CPU associated with each of the elements were drafted in a manner that is consistent with the General Plan and San Diego Forward – the Regional Plan. Proposed amendments to the Land Development Code and zoning amendments would implement the proposed CPU and would be consistent with applicable environmental goals, objectives and guidelines of the General Plan. The proposed change from the PDO to Citywide zone would not create any conflicts or inconsistencies with the adopted Land Development Code. Future development in accordance with the proposed North Park CPU would be required to comply with ESL regulations. As the proposed North Park CPU and associated discretionary actions would be consistent with applicable environmental goals, objectives, or guidelines of a General Plan, no indirect or secondary environmental impact would result and impacts would be less than significant. No mitigation is required.	None Required	Less than Significant
Would the proposed project lead to the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	The proposed North Park CPU and associated discretionary actions would not result in the conversion of open space or physically divide an established community. Community connectivity would be enhanced by provisions in the proposed North Park CPU that improve pedestrian and transit amenities. Impacts would be less than significant; therefore, no mitigation would be required.	None Required	Less than Significant
Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or	Implementation of the proposed North Park CPU and associated discretionary actions would not have significant impacts on the MHPA because ESL Regulations would limit development encroachment into sensitive biological resources. and would be consistent with the MSCP. Therefore, impacts related to conflicts	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
state habitat conservation plan?	with the MSCP Subarea Plan would be less than significant and no mitigation is required.		
Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	Although the North Park community is within the SDIA AIA, the proposed North Park CPU and associated discretionary actions would not result in conflicts with the adopted ALUCP. Future projects would be required to receive Airport Land Use Commission consistency determinations, as necessary which would ensure future projects are reviewed for consistency with the SDIA ALUCP. As a result, the proposed North Park CPU and associated discretionary actions would not result in land uses that are incompatible with an adopted Airport Land Use Compatibility Plan. Impacts would be less than significant and no mitigation is required.	None Required	Less than Significant
Visual Effects and Neighborhood Character			
Would the project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?	The implementation of the proposed North Park CPU and associated discretionary actions would not result in substantial obstruction of public views from view corridors, designated open space areas, public roads, or public parks. New development within the community would take place within the constraints of the existing urban framework and development pattern, thereby not impacting view corridors. The policies of the proposed North Park CPU and associated discretionary actions would enhance public view corridors through use of setbacks and design improvements along major roadways within the plan CPU area. Therefore, public view impacts would be less than significant, and no mitigation would be required.	None Required	Less than Significant
Would the project result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area?	While implementation of the proposed North Park CPU and associated discretionary actions would result in intensification of the CPU area, the proposed North Park CPU includes a number of policies that would ensure development is context sensitive and enhances the character of the surrounding area. Where there are transitions between residential and mixed-use or commercial areas, specific transition standards would be applied to minimize	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	adverse impacts. Thus, neighborhood character impacts would be less than significant, and no mitigation would be required.		
Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees identified in the community plan?	The implementation of the proposed North Park CPU and associated discretionary actions would not result in the loss of any distinctive or landmark trees or any stand of mature trees; therefore no impacts would result.	None Required	Less than Significant
Would the project result in a substantial change in the existing landform?	Implementation of the proposed North Park CPU and associated discretionary actions would not result in significant landform alteration impacts based on the developed nature of the plan CPU area and compliance with existing regulations in place that would protect steep slope and canyon areas from development. The proposed North Park CPU includes policies that would protect and preserve existing landforms (i.e., canyons and open space areas). In addition, future development would be evaluated to ensure compliance with the City's grading ordinance and significance thresholds related to grading quantities. Therefore, impacts would be less than significant and no mitigation would be required.	None Required	Less than Significant
Would the project create substantial light or glare which would adversely affect daytime and nighttime views in the area?	Impacts relative to lighting and glare would be less than significant. No mitigation would be required.	None Required	Less than Significant
Transportation			
Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?	The North Park CPU would result in the following cumulative impacts to intersections, roadway segments, freeway segments and ramp meters: **a. Intersections** • Madison Avenue & Texas Street (Impact 6.3-1) • El Cajon Boulevard & 30th Street (Impact 6.3-2) • El Cajon Boulevard & I-805 SB Ramps (Impact 6.3-3) • University Avenue & 30th Street (Impact 6.3-4)	The following mitigation measures were identified to reduce significant impacts; however as discussed in Chapter 6.3 of this PEIR, not all measures would be feasible and only specified measures are included in the proposed IFS, as indicated below. Measures TRANS 6.3-5, TRANS 6.3-7, TRANS 6.3-13, and TRANS 6.3-18 are included in the proposed IFS.	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	• University Avenue & Boundary Street (Impact 6.3-5) • University Avenue & I-805 NB Ramps (Impact 6.3-6) • North Park Way/ I-805 SB Ramps & Boundary Street/33rd Street (Impact 6.3-7) • Upas Street & 30th Street (Impact 6.3-8) **b. Roadway Segments** • 30th Street: Meade Avenue to University Avenue (Impact 6.3-9) • 30th Street: North Park Way to Juniper Street (Impact 6.3-10) • 32nd Street: University Avenue to Upas Street (Impact 6.3-11) • Adams Avenue: Texas Street to 30th Street (Impact 6.3-12) • Boundary Street: University Avenue to North Park Way (Impact 6.3-13) • El Cajon Boulevard: Oregon Street to Utah Street (Impact 6.3-14) • El Cajon Boulevard: 30th Street to I-805 Ramps (Impact 6.3-15) • Florida Street: El Cajon Boulevard to Upas Street (Impact 6.3-16) • Howard Avenue: Texas Street to 32nd Street (Impact 6.3-17) • Madison Avenue: Texas Street to Ohio Street (Impact 6.3-18) • Meade Avenue: Park Boulevard to Iowa Street (Impact 6.3-19) • Redwood Street: 28th Street to 30th Street (Impact 6.3-20) • Texas Street: Adams Avenue to University Avenue (Impact 6.3-21) • University Avenue: Park Boulevard to Florida Street (Impact 6.3-22)	**Intersections** **TRANS 6.3-1** Madison Avenue & Texas Street (Impact 6.3-1): Widen Texas Street in the northbound direction to add a second through lane. Widen Madison Avenue in the westbound direction to add a second right-turn lane. This cannot be accomplished with restriping of the roadway **TRANS 6.3-2** El Cajon Boulevard & 30th Street (Impact 6.3-2): Restripe 30th Street in the southbound direction to add a second left-turn lane and remove parking. Restripe El Cajon Boulevard in the westbound direction to add a second WB left-turn lane and remove parking. **TRANS 6.3-3** El Cajon Boulevard & I-805 SB Ramps (Impact 6.3-3): Widen the I-805 SB off-ramp to add a second right-turn lane. **TRANS 6.3-4** University Avenue & 30th Street (Impact 6.3-4): Restripe 30th street in the southbound direction to add a second through lane and remove parking. **TRANS 6.3-5** University Avenue & Boundary Street (Impact 6.3-5): Modify signal and restripe southbound approach to provide exclusive right-turn, through, and left-turn lanes on Boundary Street. This improvement project is identified in the North Park IFS. **TRANS 6.3-6** University Avenue & I-805 NB Ramps (Impact 6.3-6): Widen University Avenue in the eastbound direction to add an exclusive right-turn lane. Widen University	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	• University Avenue: Texas Street to Boundary Street (Impact 6.3-23) • Upas Street: Alabama Street to 30th Street (Impact 6.3-24) • Utah Street: Howard Avenue to Lincoln Avenue (Impact 6.3-25) • Utah Street: North Park Way to Upas Street (Impact 6.3-26) **c. Freeway Segments** • I-5 from Old Town Avenue to Imperial Avenue (Impact 6.3-27) • I-8 from Hotel Circle West to SR-15 (Impact 6.3-28) • SR-15 from I-805 to SR-94 (Impact 6.3-29) • I-805 from I-8 to SR-15 (Impact 6.3-30) • SR-94 from 25th Street to SR-15 (Impact 6.3-31) • SR-163 from I-8 to I-5 (Impact 6.3-32) **d. Ramp Meters** • Hancock Street to I-5 southbound on-ramp in the PM peak period (6.3-33) • Kettner Boulevard to I-5 southbound on-ramp in the PM peak period (6.3-34) • Fifth Ave to I-5 southbound on-ramp in the PM peak period (6.3-35)	Avenue in the westbound direction to add a shared through right-turn lane. Restripe and reconstruct medians on the I-805 north-bound ramps to have dual left-turn lanes and an exclusive through lane and right-turn lane. **TRANS 6.3-7** North Park Way/ I-805 SB Ramps & Boundary Street/33rd Street (Impact 6.3-7): Signalize intersection and add a second left-turn lane in the southbound direction on Boundary Street and widen the I-805 southbound on-ramp to add an additional receiving lane. <u>An additional lane may be required by Caltrans on the SB I-805 off-ramp.</u> This improvement project is identified in the North Park IFS. **TRANS 6.3-8** Upas Street & 30th Street (Impact 6.3-8): Restripe Upas Street in the westbound direction to add an exclusive right-turn lane. **Roadway Segments** **TRANS 6.3-9** 30th Street from Meade Avenue to University Avenue (Impact 6.3-9): Widen the roadway to a 4 lane collector. **TRANS 6.3-10** 30th Street <u>from North Park Way to Juniper Street</u> (Impact 6.3-10) a. North Park Way to Upas Street: Widen the roadway to a 4 lane collector. b. Upas Street to Juniper Street: Restripe the roadway to a 2 lane collector with continuous left-turn lane.	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		TRANS 6.3-11 32nd Street from University Avenue to Upas Street (Impact 6.3-11): Restripe the roadway to a 2 lane collector with continuous left-turn lane. **TRANS 6.3-12**Adams Avenue from Texas Street to 30th Street (Impact 6.3-12): Widen the roadway to a 4 lane collector. **TRANS 6.3-13** Boundary Street from University Avenue to North Park Way (Impact 6.3-13): Widen the roadway to a 4 lane collector with a continuous left turn lane. This improvement project is identified in the North Park IFS. **TRANS 6.3-14** El Cajon Boulevard from Oregon Street to Utah Street (Impact 6.3-14): Widen the roadway to an 8 lane major arterial. **TRANS 6.3-15** El Cajon Boulevard from 30th Street to I-805 Ramps (Impact 6.3-15): Widen the roadway to an 8 lane major arterial. **TRANS 6.3-16** Florida Street from El Cajon Boulevard to Upas Street (Impact 6.3-16): Restripe the roadway to a 2 lane collector with continuous left-turn lane. **TRANS 6.3-17** Howard Avenue from Texas Street to 32nd Street (Impact 6.3-17): Remove the bicycle boulevard and restore the roadway configuration to a 2 lane collector with continuous left-turn lane. **TRANS 6.3-18** Madison Avenue from Texas Street to Ohio Street (Impact 6.3-18): Restripe the roadway to a 2 lane collector with	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		continuous left-turn lane. This improvement project is identified in the North Park IFS. **TRANS 6.3-19** Meade Avenue from Park Boulevard to Iowa Street (Impact 6.3-19): Remove the bicycle boulevard and restore the roadway configuration to a 2 lane collector with continuous left-turn lane. **TRANS 6.3-20** Redwood Street from 28th Street to 30th Street (Impact 6.3-20): Restripe the roadway to a 2 lane collector with continuous left-turn lane. **TRANS 6.3-21** Texas Street (Impact 6.3-21): a. Adams Avenue to El Cajon Boulevard: Widen the roadway to a 6 lane major arterial. From Adams Avenue to Mission Avenue, construction of a retaining wall would be required along the east side of Texas Street to attenuate noise. Additionally, widening the Adams Avenue Bridge under path would be required. b. El Cajon Boulevard to University Avenue: Widen the roadway to a 4 lane collector. **TRANS 6.3-22** University Avenue from Park Boulevard to Florida Street (Impact 6.3-22): Widen the roadway to a 4 lane collector. **TRANS 6.3-23** University Avenue (Impact 6.3-23): a. Texas Street to 32nd Street: Widen the roadway to a 4 lane collector. b. 32nd Street to Boundary Street:	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Widen the roadway to a 4 lane major arterial and add a raised median. **TRANS 6.3-24** Upas Street (Impact 6.3-24) a. Alabama Street to Pershing Road: Restripe the roadway to a 2 lane collector with continuous left-turn lane. b. Pershing Road to 30th Street: Widen the roadway to a 4 lane collector. **TRANS 6.3-25** Utah Street from Howard Avenue to Lincoln Avenue (Impact 6.3-25): Restripe the roadway to a 2 lane collector with continuous left-turn lane. **TRANS 6.3-26** Utah Street from North Park Way to Upas Street (Impact 6.3-26): Restripe the roadway to a 2 lane collector with continuous left-turn lane. **Freeway Segments** **TRANS 6.3-27** I-5 northbound and southbound from Old Town Avenue to Imperial Avenue: No improvements are identified for this segment in SANDAG's RP. ~~SANDAG's 2050 Revenue Constrained RTP includes operational improvements along I-5 between Old Town Avenue and Imperial Avenue. This project is expected to be constructed by year 2050. This measure provides partial mitigation, since it improves freeway operation in the vicinity of the project.~~ **TRANS 6.3-28** I-8 eastbound and westbound from Hotel Circle (W) to SR-15: SANDAG's	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		~~2050 Revenue Constrained~~ RT~~T~~P includes operational improvements along I-8 between I-5 and SR 125 (expected to be constructed by 2040) and between I-5 and I-15 (expected to be constructed by 2050)~~Hotel Circle (W) and SR-15~~. This project is expected to be constructed by year 2050. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project. **TRANS 6.3-29** SR-15 northbound and southbound from I-805 to SR-94: SANDAG's ~~2050 Revenue Constrained~~ RT~~T~~P proposes the construction of managed lanes along SR-15 from I-5 to I-805 and from I-8 to SR-163~~between I-805 and SR-94. This project is expected to be constructed by year 2035~~2050. This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane. **TRANS 6.3-30** I-805 northbound and southbound from I-8 to SR-15: SANDAG's ~~2050 Revenue Constrained~~ RT~~T~~P proposes the construction of managed lanes along I-805 between ~~I-8 and~~ SR-15 and SR-52~~-163~~. This project is expected to be constructed by year 203~~5~~0. This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane. **TRANS 6.3-31** SR-94 eastbound and westbound from 25th Street to SR-15: SANDAG's ~~2050 Revenue Constrained~~ RT~~T~~P	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		proposes the construction of managed lanes along SR-94 between ~~25th Street and SR-15~~I-5 and SR-125~~to I-805~~. ~~This project is expected to be constructed by year 2020.~~ Caltrans is evaluating alternatives to this measure as part of the environmental analysis for the SR-94 Express Lanes Project, including bus on shoulders and other multi-modal projects outlined in the Community Based Alternatives of the SR-94 Express Lanes Project. This measure (or an alternative measure) would~~This measure~~ provide~~s~~ partial mitigation, since it reduces the traffic demand on the freeway general purpose lanes. **TRANS 6.3-32** SR-163 northbound from I-8 to Robinson Avenue and SR-163 southbound from I-8 to I-5: No improvements are identified for this state route segment in SANDAG's ~~2050 R~~TP. **Ramp Meters** **TRANS 6.3-33** The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations. Improvements could include additional lanes, interchange reconfiguration, etc.; however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. At the project level, significant	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of fair-share contribution or TDM measures that encourage carpooling and other alternative means of transportation consistent with proposed CPU policies. Fair-share contributions may be provided at the project level for impacted ramps where the impacted facility is included in the SANDAG RP; however, at this time none of the impacted ramps are included in the SANDAG RP.	
Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?	The proposed North Park CPU and associated discretionary actions would be consistent with adopted policies, plans, or programs supporting alternative transportation. Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans or programs supporting alternative transportation.	None Required	Less than Significant
Air Quality			
Would the project conflict or obstruct implementation of the applicable air quality plan?	Future operational emissions associated with the proposed North Park CPU would be greater than anticipated for future operational emissions under the adopted Community Plan. Therefore, emissions of ozone precursors (ROG and NOx) would be greater than what is accounted for in the RAQS. Thus, the proposed North Park CPU would conflict with implementation of the RAQS, and could have a potentially significant impact on regional air quality (Impact 6.4-1). Because the significant air impact stems from an inconsistency between the proposed North Park CPU and the adopted land use plans upon which the RAQS was based, the only measure that can lessen this effect is the revision of the RAQS and SIP based on the revised proposed North Park CPU.	**AQ 6.4-1** Prior to the next update of the RAQS and within six months of the certification of the Final PEIR, the City shall provide a revised land use map for the North Park CPU area to SANDAG to ensure that any revisions to the population and employment projections used by APCD in updating the RAQS and the SIP will accurately reflect anticipated growth due to the proposed North Park CPU.	**Significant and Unavoidable**
Would the project result in a violation of any air quality	Operational emissions associated with the proposed North Park CPU would be greater for all pollutants when compared to the	**AQ 6.4-2** Development that would significantly impact air quality, either	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
standard or contribute substantially to an existing or projected air quality violation?	adopted Community Plan. Additionally, the proposed North Park CPU would result in emissions in excess of project-level thresholds. Thus, the proposed North Park CPU would have a potentially significant impact on regional air quality (Impact 6.4-2).	individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact.	
Would the project expose sensitive receptors to substantial pollutant concentrations, including toxins?	Impacts to sensitive receptors would be less than significant because increases in CO at affected intersections would be below the federal and state 1-hour and 8-hour standards. Additionally, carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than the applicable threshold, and non-carcinogenic risks from diesel particulate matter would be below the maximum chronic hazard index. Thus, impacts would be less than significant and no mitigation is required.	None Required	Less than Significant
Would the project create objectionable odors affecting a substantial number of people?	Odor impacts would be less than significant as the proposed North Park CPU and associated discretionary actions do not propose land uses associated with generation of adverse odors. No mitigation is required	None Required	Less than Significant
Greenhouse Gas			
Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	The proposed North Park CPU and associated discretionary actions would increase GHG emissions over those of the adopted Community Plan; however, this increase in GHG is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be less than significant.	None Required	Less than Significant
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?	The proposed North Park CPU and associated discretionary actions would implement the General Plan's City of Villages Strategy and include policies for the promotion of walkability and bicycle use, polices promoting transit-supportive development, and thus, would be consistent with the CAP and the General Plan. Impacts would be less than significant.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Noise			
Would the project result in or create a significant increase in the existing ambient noise levels?	An increase in ambient vehicular traffic noise in the North Park CPU area would result from continued build-out of the proposed North Park CPU and increases in traffic due to regional growth. A significant increase would occur adjacent to several street segments in the North Park CPU area. The increase in ambient noise levels could result in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan. Thus, impacts to existing noise sensitive land uses would be significant (Impact 6.6-1). For new discretionary development, there is an existing regulatory framework in place that would ensure future projects implemented in accordance with the proposed North Park CPU and associated discretionary actions would not be exposed to ambient noise levels in excess of the compatibility levels in the General Plan. Thus, noise impacts to new discretionary projects would be less than significant. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 6.6-2).	No feasible mitigation has been identified at the program level to reduce impacts 6.6-1 and 6.6-2 to less than significant.	**Significant and Unavoidable**
Would the project result in an exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?	In the North Park CPU area, noise levels for all land uses would be incompatible (i.e., greater than 75 dB(A) CNEL) closest to the freeways. These areas are currently developed and the proposed North Park CPU and associated discretionary actions would not change the land use in these area. Thus, while land uses in these areas would be exposed to noise levels that exceed General Plan standards, this noise exposure would not be a significant noise impact resulting from implementation of the proposed North Park CPU and associated discretionary actions. No mitigation is required at the program level.	No feasible mitigation has been identified at the program level to reduce impact 6.6-3 to less than significant as there is no mechanism to require exterior noise analysis and attenuation for these ministerial projects.	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	A mitigation framework exists for new discretionary development in areas exposed to high levels of vehicle traffic noise. Individual projects would be required to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with the proposed North Park CPU and associated discretionary actions would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 6.6-3).		
Would the project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?	Mixed-use areas would contain residential and commercial interfaces. Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise. Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial uses, City policies and regulations would control noise and reduce noise impacts between various land uses. In addition, enforcement of the federal, state, and local noise regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts would be less than significant and no mitigation is required at the program level.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in the exposure of people to significant temporary construction noise?	**a. Construction Noise** Construction activities related to implementation of the proposed North Park CPU and associated discretionary actions would potentially generate short- term noise levels in excess of 75 dB(A) Leq at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the North Park CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land use to significant noise levels. While future development projects will be required to incorporate feasible mitigation measures, due to the close proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise would remain significant and unavoidable.	**NOISE 6.6-1** At the project level, ~~future~~ discretionary development projects will be required to incorporate feasible mitigation measures. Typically, noise can be reduced to comply with City standards when standard construction noise control measures are enforced at the project site and when the duration of the noise-generating construction period is limited to one construction season (typically one year) or less. • Construction activities shall be limited to the hours between 7:00 A.M. and 7:00 P.M. Construction is not allowed 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. (Consistent with Section 59.5.0404 of the San Diego Municipal Code). • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers. • Acoustically shield stationary equipment located near residential receivers with temporary noise barriers. • Utilize "quiet" air compressors and other stationary noise sources where technology exists.	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		• The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.	
Would the project result in the exposure of people to significant temporary construction noise? (cont.)	**b. Vibration – Construction** By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and as such would result in a less than significant impact with respect to perception. However, pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second, and would be potentially significant.	**NOISE 6.6-2** For discretionary projects where construction would include vibration-generating activities, such as pile driving, within 95 feet of existing structures, site-specific vibration studies shall be conducted to ~~determine the area of impact and to present appropriate mitigation measures that may~~ensure the development project would not adversely affect adjacent properties to the satisfaction of the Chief Building Official. Such efforts shall be conducted by a qualified structural engineer and could include the following: • Identify sites that would include vibration compaction activities such as pile driving and have the potential to generate	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		groundborne vibration and the sensitivity of nearby structures to groundborne vibration. ~~This task shall be conducted by a qualified structural engineer.~~ • Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approach the limits. • ~~At a minimum,~~M ~~m~~onitor vibration during initial demolition activities and during pile-driving activities. Monitoring results may indicate the need for more or less intensive measurements. • When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures. • Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.	
Would the project result in the exposure of people to significant temporary construction noise?	**c. Vibration – Operation** Post-construction operational vibration impacts could occur as a result of future commercial operations that are implemented in	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
(cont.)	accordance with the proposed North Park CPU and associated discretionary actions. The commercial uses that would be constructed under the proposed North Park CPU and associated discretionary actions would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the proposed North Park CPU implementation and associated discretionary actions would be less than significant. No mitigation is required.		
Historical Resources			
Would implementation of the proposed North Park CPU and associated discretionary actions result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?	Implementation of the proposed North Park CPU and associated discretionary actions could result in an alteration of a historic building, structure, object, or site. This impact would be potentially significant.	**HIST 6.7-1** Historic Buildings, Structures, and Objects Prior to issuance of any permit for a development project implemented in accordance with the proposed North Park CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines. Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		project impacts, measures shall include, but are not limited to: • Preparing a historic resource management plan; • Adding new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric); • Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation; • Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource; and • Shielding historic properties from noise generators through the use of sound walls, double glazing and air conditioning. Specific types of historical resource reports, outlined in Section III of the Historical Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report. To further increase protection of potential resources – specifically potential historic districts – the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation.	
Would implementation of the proposed North Park CPU and associated discretionary actions result in a substantial adverse change in the significance of a prehistoric archeological resource, a religious or sacred use site, or disturbance of any human remains, including those interred outside of formal cemeteries?	Implementation of the proposed North Park CPU and associated discretionary actions could adversely impact ~~a~~ prehistoric archeological or tribal cultural resources including religious or sacred use sites and human remains. This impact would be potentially significant.	**HIST-6.7-2** Archaeological and Tribal Cultural Resources Prior to issuance of any permit for a ~~future~~ development project implemented in accordance with the proposed North Park CPU that could directly affect an archaeo-logical or tribal cultural resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, 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	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		resources associated with prehistoric Native American activities. Initial Determination The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines. Step 1: Based on the results of the Initial Determination, if there is evidence that the site contains a historical resource, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeologicaly Center and any tribal repositories or museums. In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report. Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City Guidelines, must be performed by a qualified archaeologist. Step 2 Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2., in accordance with Assembly Bill 52. It should be noted that during the consultation process tribal representative(s) will be directly involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required ~~will~~shall include evaluating the horizontal and vertical	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project. The results from the testing program shall be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. 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. Resources found to be non-significant as a result of a survey and/or	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates 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. Step 3: Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable or project specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation. A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American ~~Traditional Cultural Property~~tribal cultural resource or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in a subsequent	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored. Step 4: Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required. Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and tribal cultural resources containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Form) may be used when no archaeological resources were identified within the project boundaries. Step 5: For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards, unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act[U.S.C. 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		origin shall be turned over to the appropriate Native American group for repatriation. Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources area suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations, Part 79 ~~of the Federal Register~~. Additional information regarding curation is provided in Section II of the Guidelines.	
Biological Resources			
Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or	Implementation of the proposed North Park CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. Thus, impacts to sensitive species would not be anticipated to occur since any sensitive species that could occur within the CPU area are likely to occupy canyon bottoms that would not be subject to development due to their designation as Open Space and/or MHPA. Additionally, any impact to sensitive vegetation communities would be subject to	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	the City's ESL regulations, which would ensure any impacts to vegetation communities and potential sensitive species that may occupy those communities would addressed. Thus, based on the lack of sensitive species anticipated to occur in the developable areas of the CPU area in addition to the regulatory framework in place that protects sensitive species, impacts to wildlife species would be less than significant and no mitigation would be required.		
Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	Implementation of the proposed North Park CPU and associated discretionary actions has a low potential to impact any of the six sensitive plant species previously recorded in the North Park community. As described previously, implementation of the proposed North Park CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. The potential for sensitive plant species to occur within the developed areas of the CPU is low due to the extent of development that has taken place within the CPU area and along the urban- canyon interface. Impacts to sensitive plant species would be less than significant and no mitigation would be required.	None Required	Less than Significant
Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?	No wetland habitats have been identified within the North Park CPU area. Thus, impacts to wetlands would be less than significant and no mitigation would be required.	None Required	Less than Significant
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages	The proposed MHPA boundary line correction would increase the amount of protected open space in canyons, which would be beneficial for wildlife movement in canyon areas. Thus, no impact to wildlife corridors would occur. Impacts to wildlife nursery sites, particularly migratory birds, would be avoided through compliance with the MBTA in addition	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
identified in the MSCP Plan, or impede the use of native wildlife nursery sites?	to compliance with protections afforded to lands within and adjacent to MHPA lands. Development on lands adjacent to MHPA lands would be required to avoid impacts to wildlife nursery sites in adjacent habitat areas as detailed further under Issue 5 below. Thus, with the existing regulatory framework in place, potential impacts to wildlife nursery sites would be less than significant.		
Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan or local policy protecting biological resources, either within the MSCP plan area or in the surrounding region?	The proposed North Park CPU and associated discretionary actions would be consistent with the City's MHPA Land Use Adjacency Guidelines and Municipal Code (Section 142.0740) requirements relative to lighting adjacent to the MHPA. Additionally, in complying with the MHPA Land Use Adjacency Guidelines requirements, landscape plans for future projects would require that grading would not impact environmental sensitive land, that potential runoff would not drain into MHPA land, require that toxic materials used on a development do impact adjacency sensitive land, that development includes barriers that would reduce predation by domestic animals, that landscaping does not contain exotic plants/invasive species. In addition, the MHPA Land Use Adjacency Guidelines direct development so that any brush management activities are minimized within the MHPA and contains requirements to reduce potential noise impacts to listed avian species. Compliance with the City's MHPA Land Adjacency Guidelines and adherence to the policies in the Conservation Element of the North Park CPU would reduce potential impacts of the proposed CPU to less than significant. Additionally, the proposed MHPA boundary line correction would be consistent with the goals of the MSCP to conserve biological resources and to exclude legally developed and required uses open space, MHPA and developed areas. Thus the proposed North Park CPU and associated discretionary actions would not result in any conflicts with the City's MSCP.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Geologic Conditions			
Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: o Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, o Strong seismic ground shaking, o Seismic-related ground failure, including liquefaction, or o Landslides?	Based on the Geotechnical Report prepared by GEOCON, Inc., the proposed North Park CPU and associated discretionary actions would not have direct or indirect significant environmental impacts with respect to geologic hazards, because future development would be required to occur in accordance with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geologic investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Thus, impacts would be less than significant and no mitigation is required.	None Required	Less than Significant
Would the project result in substantial soil erosion or the loss of topsoil?	Adherence to the SDMC grading regulations and construction requirements and implementation of the recommendations and standards of the City's Geotechnical Study Requirements would preclude significant impacts related to erosion or loss of topsoil. Thus, impacts would be less than significant and no mitigation is required.	None Required	Less than Significant
Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or	Future development within the North Park CPU area would be subject to requirements of the CBC and SDMC, which include preparation of a site-specific geotechnical investigation and implementation of any geotechnical recommendations to ensure geologic instability hazards are avoided. Thus, with compliance	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	with the CBC and SDMC, geologic instability impacts associated with future development within the North Park CPU area would be less than significant.		
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	A site-specific Geotechnical Investigation required for future projects within the CPU area would be required to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure potential hazards associated with expansive soils are minimized. Thus, with implementation of the recommendations included in site-specific geotechnical investigations required under the CBC and SDMC, potential impacts associated with expansive soils would be less than significant.	None Required	Less than Significant
Paleontological Resources			
Would the project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?	Because of high sensitivity for paleontological resources within the San Diego and Mission Valley Formations, grading into these formations could potentially destroy fossil resources. Therefore, implementation of future discretionary and ministerial projects within the proposed North Park CPU area within these formations has the potential to result in significant impacts to paleontological resources.	**PALEO 6.10** Prior to the approval of subsequent discretionary development projects implemented in accordance with the proposed North Park CPU, the City shall determine the potential for impacts to paleontological resources within a high sensitivity formation based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to	<u>Discretionary Projects</u> Less than Significant with Mitigation <u>Ministerial Projects</u> **Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		environmental review. I. Prior to Project Approval A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable United States Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would: • Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resources potential geologic deposit/formation/ rock unit. • Require over 2,000 cubic yards of excavation and/or 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit. • Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix. B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required. • Monitoring is always required when grading on a fossil recovery site or a known fossil location.	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		• Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum). • Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded, and/or unweathered geologic deposits/formations/rock units are present at the surface. • Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological Mitigation Monitoring and Report Program shall be implemented during construction grading activities.	
Hydrology and Water Quality			
Would the project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?	All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed North Park CPU and associated discretionary actions would either remain the same as the existing condition or would be reduced when compared to the existing condition. Impacts would be less than significant and mitigation is not required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?	New development under the proposed North Park CPU and associated discretionary actions would be required to implement LID and storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from North Park to receiving waters. Impacts would be less than significant and no mitigation would be required. Future development would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual which would protect~~, water quality conditions,~~ both surface and groundwater~~, are not expected to have an adverse effect on water.~~ quality. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. Impacts would be less than significant, and no mitigation would be required.	None Required	Less than Significant
Would the project deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge?	Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use and does not support municipal and domestic supply. Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in a less than significant impact on groundwater supply and quality.	None Required	Less than Significant
Public Services and Facilities			
Would the project promote growth patterns resulting in the	**Police Protection** Regarding police protection, the proposed North Park CPU and	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?	associated discretionary actions do not include construction of new police facilities. As population growth occurs and the need for new facilities is identified, any future construction of police facilities would be subject to a separate environmental review at the time design plans are available. Therefore, implementation of the proposed North Park CPU and associated discretionary actions would result in less than significant environmental impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services, and no mitigation is required. **Park and Recreation** Regarding park and recreational facilities, there is an existing and projected deficit in population-based parks, which is an adverse impact, but not considered significant at the program level. Implementation of the proposed North Park CPU and associated discretionary actions would provide policy support for increasing the acreage of population based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in a less than significant impact related to parks and recreation, and no mitigation is required. **Fire/Life Safety Protection** Regarding fire/life safety protection, implementation of the proposed North Park CPU and associated discretionary actions would result in an increase in overall population which could result in a change in fire-rescue response times and a demand for new or expanded facilities. However, any expansion construction of existing facilities or the development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, at the impacts associated with police/life safety facilities would be less than significant, and no mitigation is required.		

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives? (cont.)	**Libraries** Although a new library is planned for the North Park CPU area, the proposed North Park CPU and associated discretionary actions does not include construction of library facilities. Development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, impacts related to library facilities would be less than significant, and no mitigation is required. **Schools** Regarding school facilities, future residential development that occurs in accordance with the proposed North Park CPU and associated discretionary actions would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill 50 to mitigate any potential impact on district schools. The City is legally prohibited from imposing any additional mitigation related to school facilities through implementation of Senate Bill 50, and the school district would be responsible for potential expansion or development of new facilities. Therefore, impacts to schools would be less than significant, and no mitigation is required. The proposed North Park CPU contains policies to address the maintenance and improvement of public facilities. Impacts would therefore be less than significant, and no mitigation is required.	None Required	Less than Significant
Public Utilities			
Would the project use excessive amounts of water beyond projected available supplies?	There is sufficient water supply to serve existing and projected demands of the NPCPU. Future water demands within the PUD's service area would be accounted for in subsequent UWMPs. Therefore, impacts of the proposed NPCPU on water supply would be less than significant.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?	**Storm Water** Future projects would be required to exercise strict adherence to existing storm water regulations and conformance with General Plan and proposed North Park CPU policies. Project-specific review under CEQA would assure that significant adverse effects to the City's storm water system, as well as significant impacts associated with the installation of new storm water infrastructure, would be avoided. **Sewer and Water Distribution** The proposed North Park CPU acknowledges that upgrades to sewer lines are an ongoing process. Because future development of properties with the proposed North Park CPU and associated discretionary actions will likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. The proposed North Park CPU takes into consideration the existing patterns of development and the update is a response to the community's needs and goals for the future. The necessary infrastructure improvements to storm water, wastewater, and water infrastructure would be standard practice for new development to maintain or improve the existing system in adherence to sewer and water regulations and conformance with General Plan and proposed North Park CPU policies. Additionally, future projects would be required to undergo project-specific review under CEQA that would assure that impacts associated with the installation of storm water infrastructure would be reduced to below a level of significance. Therefore, impacts to sewer and water utilities would be less than significant. **Communications** Given the number of private utility providers available to serve the proposed North Park CPU area there is capacity to serve the area. Impacts would be less than significant.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan?	To ensure waste diversion and recycling efforts during construction and post-construction future land use occupancy and operation (i.e., residential, commercial, industrial, mixed-use, etc.) are addressed, a WMP shall be prepared for any discretionary project proposed under the proposed North Park CPU exceeding the threshold of 40,000 square. Implementation of these WMPs would ensure that future development project impacts would be considered less than significant. Non-discretionary projects proposed under the proposed North Park CPU, and discretionary projects that fall below the 60 ton threshold, would be required to comply with applicable SDMC sections addressing construction and demolition debris, waste a recyclable materials storage, and recyclable materials (and, in the future, organic materials) collection. Therefore, at this program-level of review, the NPCPU would not require increased landfill capacity, and impacts associated with solid waste would be less than significant.	None Required	Less than Significant
Health and Safety			
Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and proposed North Park CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards. Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazard would be less than significant and no mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	The proposed North Park CPU and associated discretionary actions would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of and existing or proposed school. Impacts would be less than significant. No mitigation is required.	None Required	Less than Significant
Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	The proposed North Park CPU and associated discretionary actions would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts are less than significant, and no mitigation would be required.	None Required	Less than Significant
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment?	Although there are closed LUST and Cleanup Program sites and two open Cleanup Program sites within the North Park community, there are local, State, and Federal regulations and programs in places that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites and no mitigation is required.	None Required	Less than Significant
Would the project expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operational accidents?	Impacts relative to safety hazards related to being located within an airport influence area less than significant. No mitigation is required.	None Required	Less than Significant
Golden Hill CPU and Associated Discretionary Actions			
Land Use			
Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary	Each element of the proposed Golden Hill CPU would be consistent with the General Plan and the City of Villages strategy. No conflicts with ESL regulations, the Land Development Code, or the San Diego Forward – the Regional Plan have been identified. As the proposed Golden Hill CPU and associated discretionary actions would be consistent with applicable environmental goals, objectives, or guidelines of a General Plan, no indirect or	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
environmental impact?	secondary environmental impact would result and impacts would be less than significant. No mitigation is required.		
Would the proposed project lead to the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	Implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in the conversion of open space or farmland, because ESL regulations would protect open space and there is no farmland in the CPU area. Goals of the proposed Golden Hill CPU Land Use and Mobility Elements promote community connectivity. In addition, the Golden Hill Conservation Element contains polices that preserve open space within the Community Plan area. Therefore, the implementation of the proposed Golden Hill CPU, and other associated discretionary actions would not lead to the development or conversion of identified open space and would not physically divide the community. Impacts related to conversion of open space or farmland and physical division of the community would be less than significant.	None Required	Less than Significant
Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?	The proposed Golden Hill CPU with other associated discretionary actions implementation would not have significant impacts on the MHPA and the project would be consistent with the MSCP. Impacts would be less than significant and no mitigation is required.	None Required	Less than Significant
Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	Although the Golden Hill community is within the SDIA AIA, the proposed Golden Hill CPU and associated discretionary actions would not result in any conflicts with the adopted ALUCP. Future projects would be required to receive Airport Land Use Commission consistency determinations, as necessary, which would ensure future projects are consistent with the SDIA ALUCP. As a result, the proposed Golden Hill CPU and associated discretionary actions would not result in land uses that are incompatible with an adopted Airport Land Use Compatibility Plan. Impacts would be less than significant and no mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Visual Effects and Neighborhood Character			
Would the project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?	The implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in substantial obstruction of public views from view corridors, designated open space areas, public roads, or public parks. New development within the community would take place within the constraints of the existing urban framework and development pattern, thereby not impacting view corridors along transportation corridors. The policies of the proposed Golden Hill CPU and associated discretionary actions would enhance public view corridors through use of setbacks and design improvements along major roadways within the plan area. Therefore, public view impacts would be less than significant, and no mitigation would be required.	None Required	Less than Significant
Would the project result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area?	The proposed Golden Hill CPU Urban Design Element policies would encourage residential and mixed-use development and would be consistent with existing neighborhood character. Impacts would be less than significant and no mitigation would be required.	None Required	Less than Significant
Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees identified in the community plan?	The implementation of the proposed Golden Hill CPU would not result in the loss of any distinctive or landmark trees or any stand of mature trees; therefore no impacts would result. No mitigation measures would be required.	None Required	Less than Significant
Would the project result in a substantial change in the existing landform?	Implementation of the proposed Golden Hill CPU and associated discretionary actions would result in less than significant impacts related to landform alteration based on implementation of proposed Golden Hill CPU polices that require building form to be sensitive to topography and slopes and existing protections for steep slopes (environmentally sensitive lands) and grading regulations within the LDC. Thus, impacts related to landform alteration would be less than significant and no mitigation would be required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project create substantial light or glare which would adversely affect daytime and nighttime views in the area?	Impacts relative to lighting and glare would be less than significant. No mitigation would be required.	None Required	Less than Significant
Transportation			
Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?	The following cumulative impacts to intersections, roadway segments, freeway segments, and ramp meters were determined to be significant: **a. Intersections** • B Street & 17th Street/ I-5 SB Off-Ramp (Impact 7.3-1) • SR-94 WB Ramps & Broadway (Impact 7.3-2) • SR-94 WB Ramp & 28th Street (Impact 7.3-3) • SR-94 EB Ramp & 28th Street (Impact 7.3-4) • F Street & 25th Street (Impact 7.3-5) • G Street & 25th Street (Impact 7.3-6) **b. Roadway Segments** • 25th Street: Broadway to F Street (Impact 7.3-7) • 28th Street: Russ Boulevard to SR-94 (Impact 7.3-8) • 30th Street: Grape Street to SR-94 (Impact 7.3-9) • B Street: 25th Street to 28th Street (Impact 7.3-10) • C Street: 30th Street to 34th Street (Impact 7.3-11) • Fern Street: Juniper Street to A Street (Impact 7.3-12) • Grape Street: 30th Street to 31st Street (Impact 7.3-13) **c. Freeway Segments** • I-5 from Old Town Avenue to Imperial Avenue (Impact 7.3-14) • I-8 from Hotel Circle West to SR-15 (Impact 7.3-15) • SR-15 from I-805 to SR-94 (Impact 7.3-16) • I-805 from I-8 to SR-15 (Impact 7.3-17) • SR-94 from 25th Street to SR-15 (Impact 7.3-18) • SR-163 from I-8 to I-5 (Impact 7.3-19) **d. Ramp Meters** • Hancock Street to I-5 southbound on-ramp in the PM peak period (7.3-20)	The following improvements that ~~mitigation measures were identified to~~would reduce potentially significant impacts; however as discussed in Chapter ~~6~~7.3 of this PEIR, not all measures would be feasible and only specified measures are included in the proposed IFS, as indicated below. Measures TRANS 7.3-1 through TRANS 7.3-6, TRANS 7.3-8b, TRANS 7.3-9b and TRANS 7.3-9c are included in the IFS. **Intersections:** **TRANS 7.3-1** B Street & 17th Street/I-5 SB Off-Ramp (Impact 7.3-1): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS. **TRANS 7.3-2** SR-94 WB Ramps & Broadway (Impact 7.3-2): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS. **TRANS 7.3-3** SR-94 WB Ramps & 28th Street (Impact 7.3-3): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS. **TRANS 7.3-4** SR-94 EB Ramps & 28th Street (Impact 7.3-4): Install traffic signal control at the intersection. Restripe the southbound approach to have an exclusive left-turn lane	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	• Kettner Boulevard to I-5 southbound on-ramp in the PM peak period (7.3-21) • Fifth Ave to I-5 southbound on-ramp in the PM peak period (7.3-22)	and a through lane. This improvement project is identified in the Golden Hill IFS. **TRANS 7.3-5** F Street & 25th Street (Impact 7.3-5): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS. **TRANS 7.3-6** G Street & 25th Street (Impact 7.3-6): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS. **Roadway Segments** **TRANS 7.3-7** 25th Street from Broadway to F Street (Impact 7.3-7): Widen the roadway to a 4 lane collector. **TRANS 7.3-8** 28th Street (Impact 7.3-8) a. Russ Boulevard to Broadway: Restripe the roadway to have a continuous left-turn lane. b. Broadway to SR-94: Widen the roadway to a 4-lane collector. However, partial mitigation is proposed at this location with the widening of the roadway to a two-lane collector with continuous left-turn lane. This improvement project is identified on the Golden Hill IFS. **TRANS 7.3-9** 30th Street from Grape Street to SR-94 (Impact 7.3-9) a. Grape Street to Ash Street: Restripe the roadway to have a continuous left-turn lane.	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		b. A Street to Broadway: Widen the roadway to a 4 lane collector. However, partial mitigation is proposed at this location with the widening of the roadway to a two lane collector with continuous left-turn lane. This improvement project is identified on the Golden Hill IFS. c. The proposed Broadway to SR-94: Widen roadway to a 2 lane collector with continuous left-turn lane. This improvement project is identified on the Golden Hill IFS. **TRANS 7.3-10** B Street from 25th Street to 28th Street (Impact 7.3-10): Restripe the roadway to have a continuous left-turn lane. **TRANS 7.3-11** C Street from 30th Street to 34th Street (Impact 7.3-11): Restripe the roadway to have a continuous left-turn lane. **TRANS 7.3-12** Fern Street from Juniper to A Street (Impact 7.3-12) a. Juniper to Grape Street: Restripe the roadway to have a continuous left-turn lane. b. Grape Street to A Street: Widen the roadway to a 4-lane collector. **TRANS 7.3-13** Grape Street from 30th Street to 31st Street (Impact 7.3-13): Restripe the roadway to have a continuous left-turn lane.	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Freeway Segments **TRANS 7.3-14** I-5 northbound and southbound from Old Town Avenue to Imperial Avenue (Impact 7.3-14: No improvements are identified for this segment in SANDAG's RP.~~SANDAG's 2050 Revenue Constrained RTP includes operational improvements along I-5 between Old Town Avenue and Imperial Avenue. This project is expected to be constructed by year 2050. This measure provides partial mitigation, since it improves freeway operation in the vicinity of the project.~~ **TRANS 7.3-15** I-8 eastbound and westbound from Hotel Circle (W) to SR-15 (Impact 7.3-15): SANDAG's RP~~2050 Revenue Constrained RTP~~ includes operational improvements along I-8 between I-5 and SR 125 (expected to be constructed by 2040) and between I-5 and I-15 (expected to be constructed by 2050)~~Hotel Circle (W) and SR-15~~. This project is expected to be constructed by year 2050. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project. **TRANS 7.3-16** SR-15 northbound and southbound from I-805 to SR-94 (Impact 7.3-16): SANDAG's RP~~2050 Revenue Constrained RTP~~ proposes the construction of managed lanes along SR-15 ~~between I-805 and SR-94~~from I-5 to I-805 and from I-8 to SR-163. ~~This project is expected to be constructed by year 2035~~2050.~~-~~This measure provides partial mitigation, since it reduces the traffic	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		demand on the freeway general purpose lane. **TRANS 7.3-17** I-805 northbound and southbound from I-8 to SR-15 (Impact 7.3-17): SANDAG's ~~2050 Revenue Constrained~~ RTP proposes the construction of managed lanes along I-805 between ~~I-8 and~~ SR-15 to SR-52 ~~163~~. This project is expected to be constructed by year 2030. This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane. **TRANS 7.3-18** SR-94 eastbound and westbound from 25th Street to SR-15 (Impact 7.3-18): SANDAG's ~~2050 Revenue Constrained~~ RTP proposes the construction of managed lanes along SR-94 between I-5 ~~to~~and I-805~~25th Street and SR-15. This project is expected to be constructed by year 2020.~~ Caltrans is evaluating alternatives to this measure as part of the environmental analysis for the SR-94 Express Lanes Project, including bus on shoulders and other multi-modal projects outlined in the Community Based Alternatives of the SR-94 Express Lanes Project. This measure (or an alternative measure) would ~~This measure~~ provide~~s~~ partial mitigation, since it would reduce~~s~~ the traffic demand on the freeway general purpose lanes. **TRANS 7.3-19** SR-163 northbound from I-8 to Robinson Avenue and SR-163 southbound from I-8 to I-5 (Impact 7.3-19): No improvements are identified for this state route segment in SANDAG's ~~2050~~ RTP.	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Ramp Meters **TRANS 7.3-20** The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations (Impacts 7.3-20 through 7.3-22. Improvements could include additional lanes, interchange reconfiguration, etc.; however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. At the project-level, significant impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of fair-share contribution or TDM measures that encourage carpooling and other alternative means of transportation consistent with proposed CPU policies. Fair-share contributions may be provided at the project level for impacted ramps where the impacted facility is included in the SANDAG RP; however, at this time none of the impacted ramps are included in the SANDAG RP.	
Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?	The proposed Golden Hill CPU and associated discretionary actions would be consistent with adopted policies, plans, or programs supporting alternative transportation. Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans or programs supporting alternative transportation.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Air Quality			
Would the project conflict or obstruct implementation of the applicable air quality plan?	Future operational emissions from the build-out of the proposed Golden Hill CPU would be less than anticipated for future operational emissions under the adopted Community Plans. Thus, emissions associated with the proposed Golden Hill CPU are already accounted for in the RAQS, and adoption of the proposed Golden Hill CPU would not conflict with the RAQS. Thus regarding Issue 1, impacts related to conflicts with applicable air quality plans would be less than significant.	None Required	Less than Significant
Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	Regarding construction emissions, based on the hypothetical worst case construction emission analysis discussed previously, air emissions associated with build-out of individual projects under the proposed Golden Hill CPU and associated discretionary actions would be less than significant. Additionally, based on the types and scale of projects that are ministerial, air emissions associated with ministerial projects would not be of a size that would have the possibility of exceeding project-level thresholds for air quality. Thus, construction emissions would be less than significant. Regarding operational emissions, build-out of the CPU area would exceed the City's project-level thresholds for the proposed Golden Hill CPU; however, the Golden Hill CPU would emit fewer pollutants than would occur under the adopted Community Plan. Therefore, the air emissions from build-out of the proposed Golden Hill CPU would not increase air pollutants in the region, would not further increase the frequency of existing violations of federal or state AAQS, or would not result in new exceedances. Therefore, operational air quality impacts associated with the adoption of the proposed Golden Hill CPU would be less than significant.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project expose sensitive receptors to substantial pollutant concentrations, including toxins?	Regarding impacts to sensitive receptors (Issue 3), implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in any CO hot spots. Additionally, carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than the applicable threshold, and non-carcinogenic risks from diesel particulate matter would be below the maximum chronic hazard index. Thus, air quality impacts to sensitive receptors would be less than significant.	None Required	Less than Significant
Would the project create objectionable odors affecting a substantial number of people?	Odor impacts would be less than significant as the proposed Golden Hill CPU and associated discretionary actions do not propose land uses associated with generation of adverse odors.	None Required	Less than Significant
Greenhouse Gas			
Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	Potential impacts related to GHG emissions from implementation of the proposed Golden Hill CPU and associated discretionary actions would be less than significant as the GHG emissions from the Golden Hill CPU would not be greater than those assumed for the community planning area in the CAP's GHG Inventory, and the Golden Hill CPU is otherwise consistent with the CAP.	None Required	Less than Significant
Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?	The proposed Golden Hill CPU would implement the General Plan's City of Villages Strategy and include policies for the promotion of walkability and bicycle use, polices promoting transit-supportive development, and thus, is consistent with the CAP and the General Plan. Impacts related to conflicts with applicable plans and policies addressing GHG emissions would be less than significant and no mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Noise			
Would the project result in or create a significant increase in the existing ambient noise levels?	An increase in ambient vehicular traffic noise in the Golden Hill CPU area would result from continued build-out of the proposed Golden Hill CPU and increases in traffic due to regional growth. A significant increase would occur adjacent to several street segments in the Golden Hill CPU area. The increase in ambient noise levels could result in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan. Thus, impacts to existing noise sensitive land uses would be significant (Impact 7.6-1). For new discretionary development, there is an existing regulatory framework in place that would ensure future projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions would not be exposed to ambient noise levels in excess of the compatibility levels in the General Plan. Thus, noise impacts to new discretionary projects would be less than significant. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise would be adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 7.6-2).	No feasible mitigation measures have been identified to address impacts 7.6-1 and 7.6-2 because there is no mechanism or funded program in place to provide noise attenuation at existing structures that would be exposed to ambient noise increases.	**Significant and Unavoidable**
Would the project result in an exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?	In the Golden Hill CPU area, noise levels for all land uses would be incompatible [i.e., greater than 75 dB(A) CNEL] closest to the freeways and specific segments of Sixth Avenue and Grape Street. These areas are currently developed and the proposed Golden Hill CPU and associated discretionary actions would not change the land use in these areas. Thus, while land uses in these areas would be exposed to noise levels that exceed General Plan standards, this noise exposure would not be a significant noise impact resulting from implementation of the proposed Golden Hill CPU and associated discretionary actions. No mitigation is required at the program level.	No feasible mitigation has been identified at the program level to reduce impact 7.6-3 to less than significant as there is no mechanism to require exterior noise analysis and attenuation for these ministerial projects.	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	A mitigation framework exists for new discretionary development in areas exposed to high levels of vehicle traffic noise. Individual projects would be required to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with future discretionary projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 7.6-3).		
Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?	Based on the projected airport noise contours for the SDIA, there are sensitive receptors in the Golden Hill CPU area that are located where noise levels due to aircraft operations exceed 60 dB(A) CNEL. Because future development is required to provide noise attenuation consistent with the Noise Element of the General Plan and the ALUCP for the SDIA, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact from aircraft noise. At the project-level, future development must include noise attenuation consistent with the Noise Element of the General Plan and the Airport Land Use Compatibility Plan for the SDIA, therefore impacts related to airport noise would remain less than significant.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?	Mixed-use areas would contain residential and commercial interfaces. Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise. Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial uses, City policies and regulations would control noise and reduce noise impacts between various land uses. In addition, enforcement of the federal, state, and local noise regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts would be less than significant and no mitigation is required at the program level.	None Required	Less than Significant
Would the project result in the exposure of people to significant temporary construction noise?	**a. Construction Noise** Construction activities related to implementation of the proposed Golden Hill CPU and associated discretionary actions would potentially generate short- term noise levels in excess of 75 dB(A) Leq at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the Golden Hill CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land use to significant noise levels. While future development projects would be required to incorporate feasible mitigation measures, due to the close proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise would remain significant and unavoidable (Impact 7.6-4).	**NOISE 7.6-1** At the project level, ~~future~~ development projects will be required to incorporate feasible mitigation measures. Typically, noise can be reduced to comply with City standards when standard construction noise control measures are enforced at the project site and when the duration of the noise-generating construction period is limited to one construction season (typically one year) or less. • Construction activities shall be limited to the hours between 7:00 A.M. and 7:00 P.M. Construction is not allowed 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. (Consistent with Section 59.5.0404 of the San Diego Municipal Code). • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		condition and appropriate for the equipment. • Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers. • Acoustically shield stationary equipment located near residential receivers with temporary noise barriers. • Utilize "quiet" air compressors and other stationary noise sources where technology exists. • The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Result in the exposure of people to significant temporary construction noise (cont.)	**b. Vibration – Construction** By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and as such would result in a less than significant impact with respect to perception. However, pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second, and would be potentially significant (Impact 7.6-5).	**NOISE 7.6-2** For discretionary projects where construction would include vibration-generating activities, such as pile driving, within 95 feet of existing structures, site-specific vibration studies shall be conducted to ~~determine the area of impact and to present appropriate mitigation measures that may~~ensure the development project would not adversely affect adjacent properties to the satisfaction of the Chief Building Official. Such efforts shall be conducted by a qualified structural engineer and could include the following: • Identify sites that would include vibration compaction activities such as pile driving and have the potential to generate groundborne vibration and the sensitivity of nearby structures to groundborne vibration. ~~This task shall be conducted by a qualified structural engineer.~~ • Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approach the limits.	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		• ~~At a minimum,~~ Mmonitor vibration during initial demolition activities and during pile-driving activities. Monitoring results may indicate the need for more or less intensive measurements. • When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures. • Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.	
Result in the exposure of people to significant temporary construction noise (cont.)	**c. Vibration – Operation** Post-construction operational vibration impacts could occur as a result of commercial operations that are implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions. The commercial uses that would be constructed under the proposed Golden Hill CPU and associated discretionary actions would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the proposed Golden Hill CPU implementation and associated discretionary actions would be less than significant. No mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Historical Resources			
Would implementation of the proposed Golden Hill CPU and associated discretionary actions result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?	Implementation of the proposed Golden Hill CPU and associated discretionary actions could result in an alteration of a historic building, structure, object, or site. This impact would be potentially significant.	**HISTORIC BUILDINGS, STRUCTURES, AND OBJECTS** Prior to issuance of any permit for a development project implemented in accordance with the proposed North Park CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines. Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to: Preparing a historic resource management plan; Adding new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation; Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource; and Shielding historic properties from noise generators through the use of sound walls, double glazing and air conditioning. Specific types of historical resource reports, outlined in Section III of the Historical Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report. ~~To further increase protection of potential resources – specifically potential historic districts – the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation.~~	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would implementation of the proposed Golden Hill CPU and associated discretionary actions result in a substantial adverse change in the significance of a prehistoric archeological resource, a religious or sacred use site, or disturbance of any human remains, including those interred outside of formal cemeteries?	Implementation of the proposed Golden Hill CPU and associated discretionary actions could adversely impact a prehistoric archeological resource including religious or sacred use sites and human remains. This impact would be potentially significant.	**ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES** Prior to issuance of any permit for a future development project implemented in accordance with the proposed North Park CPU that could directly affect an archaeological or tribal cultural resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, 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 prehistoric Native American activities. Initial Determination The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological evaluation	**Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines. Step 1: Based on the results of the Initial Determination, if there is evidence that the site contains a historical resource, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeologicaly Center and any tribal repositories or museums. In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archeological research in similar areas,	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report. Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City Guidelines, must be performed by a qualified archaeologist. Step 2 Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		21080.3.2., in accordance with Assembly Bill 52. It should be noted that during the consultation process tribal representative(s) will be directly involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required will include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project. The results from the testing program shall be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. 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. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates 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. Step 3: Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable or project specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation. A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American ~~Traditional Cultural Property~~tribal	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		cultural resource or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored. Step 4: Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required. Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and tribal cultural resources containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries. Step 5: For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards, unless otherwise determined during the tribal	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act [U.S.C. 3001-3013) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation. Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources area suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations, Part 79 ~~of the Federal Register~~. Additional information regarding curation is provided in Section II of the Guidelines.	
Biological Resources			
Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	No sensitive wildlife species are known to occur within the Golden Hill CPU area. Additionally, if sensitive species were identified within the CPU area, they are most likely to occur within the canyon areas which are currently designated Open Space and/or MHPA and would not be subject to development. As a result, those areas likely to support habitat for sensitive wildlife species would be conserved. Indirect impacts to sensitive wildlife species would be implemented through the City's Land Use Adjacency Guidelines of the City's MSCP. Thus, impacts to sensitive wildlife species resulting from build-out the proposed Golden Hill CPU and associated discretionary actions would be less than significant.	None Required	Less than Significant
Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	Implementation of the proposed Golden Hill CPU and associated discretionary actions have a low potential to impact any of the sensitive plant species previously recorded in the Golden Hill community due to the location of these vegetation communities within protected canyon areas. Build-out of the proposed Golden Hill CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. The potential for sensitive plant species to still occur is low due to the extent of development that has taken place within the Golden Hill CPU area and along the urban-canyon interface. Though focused surveys for sensitive plant species were not conducted in support of this document, it is anticipated that these species, if they occur,	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	would be located within the canyon portions of the Golden Hill CPU area. Thus, impacts to sensitive vegetation communities and plant species due to implementation of the Golden Hill CPU and associated discretionary actions would be less than significant and no mitigation would be required.		
Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?	No wetland habitats have been identified within the Golden Hill CPU area. Thus, impacts to wetlands would be less than significant and no mitigation would be required.	None Required	Less than Significant
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?	Impacts to wildlife movement corridors and wildlife nursery sites would be less than significant with the application of the existing regulatory framework that protects the remaining habitat located within canyon areas. These remaining habitat areas are protected through the proposed open space designation, their location within the MHPA, in addition to ESL regulations. Additionally, nesting birds are protected through Federal protections of the MBTA. Thus, impacts related to wildlife corridors and nursery sites would be less than significant.	None Required	Less than Significant
Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan or local policy protecting biological resources, either within the MSCP plan area or in the surrounding region?	The proposed Golden Hill CPU and associated discretionary actions would be consistent with the MHPA Land Use Adjacency Guidelines and Municipal Code (Section 142.0740) requirements relative to lighting adjacent to the MHPA. Additionally, in complying with the MHPA Land Use Adjacency Guidelines requirements, landscape plans for future projects would be required to ensure that grading would not impact environmentally sensitive lands, potential runoff would not drain into MHPA land, toxic materials used on developments do not impact adjacent sensitive land, development includes barriers that would reduce predation by domestic animals, and landscaping does not contain exotic plants/invasive species. In	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	addition, the MHPA Land Use Adjacency Guidelines direct development so that any brush management activities are minimized within the MHPA, and contains requirements to reduce potential noise impacts to listed avian species. Compliance with the City's MHPA Land Use Adjacency Guidelines and adherence to the policies in the Conservation Element of the Golden Hill CPU would reduce potential impacts of the proposed CPU to less than significant. Additionally, the proposed MHPA boundary line correction would be consistent with the goals of the MSCP to conserve biological resources and to exclude legally developed and required uses open space, MHPA and developed areas. Thus, the proposed Golden Hill CPU and associated discretionary actions would not result in any conflicts with the City's MSCP.		
Geologic Conditions			
Would the project: 1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: o Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault,	Based on the Geotechnical Report prepared by GEOCON, Inc., the proposed Golden Hill CPU and associated discretionary actions would not have direct or indirect significant environmental impacts with respect to geologic hazards, because future development would be required to occur in accordance with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geologic investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Thus, impacts would be less than significant and no mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
o Strong seismic ground shaking, o Seismic-related ground failure, including liquefaction, o Landslides?			
Would the project result in substantial soil erosion or the loss of topsoil?	Adherence to the SDMC grading regulations and construction requirements and implementation of the recommendations and standards of the City's Geotechnical Study Requirements would preclude significant impacts related to erosion or loss of topsoil. Thus, impacts would be less than significant and no mitigation is required.	None Required	Less than Significant
Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Future development within the Golden Hill CPU area would be subject to requirements of the CBC and SDMC, which include preparation of a site-specific geotechnical investigation and implementation of any geotechnical recommendations to ensure geologic instability hazards are avoided. Thus, with compliance with the CBC and SDMC, geologic instability impacts associated with future development within the Golden Hill CPU area would be less than significant.	None Required	Less than Significant
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	A site-specific Geotechnical Investigation required for future projects within the CPU area would be required to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure potential hazards associated with expansive soils are minimized. Thus, with implementation of the recommendations included in site-specific geotechnical investigations required under the CBC and SDMC, potential impacts associated with expansive soils would be less than significant.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Paleontological Resources			
Would the project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?	Because of high sensitivity for paleontological resources within the San Diego Formation, grading into this formation could potentially destroy fossil resources. Therefore, implementation of future ministerial and discretionary projects within the proposed Golden Hill CPU area within the San Diego Formation has the potential to result in significant impacts to paleontological resources.	**PALEO 7.10** Prior to the approval of subsequent discretionary development projects implemented in accordance with the proposed North Park CPU, the City shall determine the potential for impacts to paleontological resources within a high sensitivity formation based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review. I. Prior to Project Approval A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable United States Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:	<u>Discretionary Projects</u> Less than Significant with Mitigation <u>Ministerial Projects</u> **Significant and Unavoidable**

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		• Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resources potential geologic deposit/formation/rock unit. • Require over 2,000 cubic yards of excavation and/or 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit. • Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix. B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required. • Monitoring is always required when grading on a fossil recovery site or a known fossil location. • Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).	

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		• Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded, and/or unweathered geologic deposits/formations/rock units are present at the surface. • Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological Mitigation Monitoring and Report Program shall be implemented during construction grading activities.	
Hydrology and Water Quality			
Would the project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?	All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed Golden Hill CPU and associated discretionary actions would either remain the same as the existing condition or would be reduced when compared to the existing condition. Impacts would be less than significant and mitigation is not required.	None Required	Less than Significant
Would the project result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?	New development under the proposed Golden Hill CPU and associated discretionary actions would be required to implement LID and storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from Golden Hill to receiving waters. Impacts would	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	be less than significant and no mitigation would be required. Future development would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual which would protect ~~, water quality conditions,~~ both surface and groundwater~~, are not expected to have an adverse effect on water~~ quality. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. Impacts would be less than significant, and no mitigation would be required.		
Would the project deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge?	Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use and does not support municipal and domestic supply. Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact on groundwater supply and quality.	None Required	Less than Significant
Public Services and Facilities			
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public	**Police Protection** Regarding police protection, the proposed Golden Hill CPU and associated discretionary actions does not include construction of new police facilities. As population growth occurs and the need for new facilities is identified, any future construction of police facilities would be subject to a separate environmental review at the time design plans are available. Therefore, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in less than significant environmental	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?	impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services, and no mitigation is required. **Park and Recreation** Regarding park and recreational facilities, there is an existing and projected deficit in population-based parks, which is an adverse impact, but not considered significant at the program level. Implementation of the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage of population based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact related to parks and recreation, and no mitigation is required. **Fire/Life Safety Protection** Regarding fire/life safety protection, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in an increase in overall population which could result in a change in fire-rescue response times and demand for new or expanded facilities. However, expansion of existing facilities or construction of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, impacts associated with police/life safety facilities would be less than significant, and no mitigation is required.		
	Libraries The proposed Golden Hill CPU and associated discretionary actions does not include construction of library facilities. Development of any new facility would be subject to separate environmental review at the time design plans are available. Therefore, impacts related to library facilities would be less than significant, and no mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	Schools Regarding school facilities, future residential development that occurs in accordance with the proposed Golden Hill CPU and associated discretionary actions would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill 50 to mitigate any potential impact on district schools. The City is legally prohibited from imposing any additional mitigation related to school facilities through implementation of Senate Bill 50, and the school district would be responsible for potential expansion or development of new facilities. Therefore, impacts to schools would be less than significant, and no mitigation is required. The proposed Golden Hill CPU contains policies to address the maintenance and improvement of public facilities. Impacts would therefore be less than significant, and no mitigation is required.		
Public Utilities			
Would the project use excessive amounts of water beyond projected available supplies?	Based on the findings of the WSA, there is sufficient water supply to serve existing and projected demands of the GHCPU, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Therefore, impacts of the proposed GHCPU on water supply would be less than significant.	None Required	Less than Significant
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?	**Storm Water** Future projects would be required to exercise strict adherence to existing storm water regulations and conformance with General Plan and Golden Hill CPU policies. Project-specific review under CEQA would assure that significant adverse effects to the City's storm water system, as well as significant impacts associated with the installation of new storm water infrastructure, would be avoided.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	Sewer and Water Distribution The proposed Golden Hill CPU acknowledges that upgrades to sewer lines are an ongoing process. These upgrades are administered by the PUD and are handled on project-by-project basis. Because future development of properties with the proposed Golden Hill CPU and associated discretionary actions will likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. The proposed Golden Hill CPU takes into consideration the existing patterns of development, and the update is a response to the community's needs and goals for the future. The necessary infrastructure improvements to the storm water, wastewater, and water infrastructure would be standard practice for new development to maintain or improve the existing system in adherence to sewer and water regulations and conformance with General Plan and proposed Golden Hill CPU policies. Additionally, future projects would be required to undergo project-specific review under CEQA that would assure that impacts associated with the installation of storm water infrastructure would be reduced to below a level of significance. Therefore, impacts to sewer and water utilities would be less than significant. **Communications** Given the number of private utility providers available to serve the proposed Golden Hill CPU area, there is capacity to serve the area. Impacts would be less than significant.		
3) Result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as	To ensure waste diversion and recycling efforts during construction and post-construction future land use occupancy and operation (i.e., residential, commercial, industrial, mixed-use, etc.) are addressed, a WMP shall be prepared for any discretionary project proposed under the proposed Golden Hill CPU exceeding the threshold of 40,000 square feet or more. Implementation of these WMPs would ensure that future	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
targeted in AB 341 and the City's Climate Action Plan;	development project impacts would be considered less than significant. Non-discretionary projects proposed under the proposed Golden Hill CPU, and discretionary projects that fall below the 60 ton threshold, would be required to comply with applicable SDMC sections addressing construction and demolition debris, waste and recyclable materials storage, and recyclable materials (and, in the future, organic materials) collection. Therefore, at this program-level of review, the NPCPU would not require increased landfill capacity, and impacts associated with solid waste would be less than significant.		
Health and Safety			
Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and proposed Golden Hill CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards. Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazard would be less than significant.	None Required	Less than Significant
Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	The proposed Golden Hill CPU and associated discretionary actions would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of any existing or proposed school. Impacts to schools would be less than significant. No mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	The proposed Golden Hill CPU and associated discretionary actions would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts are less than significant, and no mitigation would be required.	None Required	Less than Significant
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment?	There are no hazardous material release case sites within the Golden Hill community; therefore, no impacts would result. Should hazardous materials release sites be encountered in the future, there are local, State, and Federal regulations and programs in places that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites and no mitigation is required.	None Required	Less than Significant
Expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operational accidents.	Impacts relative to safety hazards related to being located within an airport influence area less than significant. No mitigation is required.	None Required	Less than Significant



Chapter 1
Introduction

This draft Program Environmental Impact Report (PEIR) for the proposed North Park and Golden Hill Community Plan Updates (proposed CPUs or CPU areas) and other associated approvals (collectively referred to throughout this PEIR as the project) has been prepared on behalf of the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title14, Section 15000, et seq.) and in accordance with the City's Environmental Impact Report Guidelines (EIR Guidelines; City of San Diego 2005) and the City's California Environmental Quality Act Significance Determination Thresholds (Significance Determination Thresholds) (2011).

The project analyzed within this PEIR includes a number of legislative actions to be considered by the City Council but are primarily comprehensive updates of the 1986 Greater North Park Community Plan (the North Park Community Plan), and the 1988 Greater Golden Hill Community Plan (the Golden Hill Community Plan). The updated Community Plans reflect Citywide policies and programs developed in the City of San Diego General Plan Update of 2008 (General Plan) and are consistent with the General Plan for the proposed CPU areas. The Golden Hill CPU contains nine elements, as well as an Introduction and Implementation section. The elements are as follows: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Noise; Conservation; and Historic Preservation. The proposed North Park CPU includes all of these elements, as well as an Arts and Culture Element.

Each Community Plan contains a specific vision, as well as overall or key goals. Policies to achieve the vision and goals may be shared between the plans or may be unique to a specific community where needed or desired. Each Community Plan contains development design guidelines, as well as policies related to a range of topics included in each section such as mobility options, environmental conservation, recreation opportunities, neighborhood character, and historic preservation in accordance with the general goals stated in the General Plan. The proposed CPUs serve as the basis for guiding a variety of other future implementing actions, such as parkland acquisitions and mobility options.

1.1 PEIR Purpose and Intended Uses

In accordance with the CEQA Guidelines Section 15121, the purpose of this PEIR is to provide public agency decision-makers and members of the public with detailed information about the potential significant environmental effects of the project, possible ways to minimize its significant effects, and reasonable alternatives that would reduce or avoid any identified significant effects. This PEIR is informational in nature and is intended for use by decision-makers, Responsible or Trustee Agencies as defined under CEQA, other interested agencies or jurisdictions, and the general public. The PEIR includes recommended mitigation measures, which—when implemented—would lessen project impacts and provide the City, the lead agency as defined in Article 4 of CEQA Guidelines (Sections 15050 to 15051), with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to each of the proposed CPUs are presented to evaluate alternative land use scenarios and/or policies that would further reduce or avoid significant impacts associated with each CPU.

In accordance with CEQA Guidelines Section 15168, a PEIR may serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the CPU areas, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, the City can approve the activity as being within the scope covered by this PEIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines, Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or EIR).

1.2 PEIR Legal Authority

1.2.1 Lead Agency

The City of San Diego is the lead agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The lead agency, as defined by CEQA Guidelines Section 15367, is the public agency that has the principal responsibility and authority for carrying out or approving a project. On behalf of the lead agency, the City's Development Services Department, Environmental Analysis Section, conducted a preliminary review of the project and decided that an EIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

1.2.2 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by Responsible and Trustee Agencies. A Responsible Agency, defined pursuant to State CEQA Guidelines Section 15381, includes all public agencies other than the lead agency that have discretionary approval power over the project. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over

natural resources affected by a project that are held in trust for the people of the State of California. Implementation of the project would require subsequent actions or consultation from Responsible or Trustee Agencies. A brief description of some of the primary Responsible or Trustee Agencies that may have an interest in the project is provided below.

1.2.2.1 U.S. Army Corps of Engineers (USACE)

The USACE has jurisdiction over development in or affecting the waters of the United States. All permits issued by the USACE are subject to consultation and/or review by the United States Fish and Wildlife Service (USFWS) and the United States Environmental Protection Agency (U.S. EPA). Drainages and canyons occurring in the CPU areas may contain streams and wetlands, which may be classified as jurisdictional waters of the United States. No permits from USACE are required for the proposed CPUs or other associated approvals; however, future development projects, particularly improvements to infrastructure such as water and sewer lines that could occur with implementation of the project, may require review and/or USACE permits in the future.

1.2.2.2 California Department of Transportation (CALTRANS)

The proposed CPU areas are adjacent to Caltrans' facilities, including Interstate 5 (I-5), I-15, I-805, State Route 163 (SR-163), and SR-94. No permits from Caltrans are required at this time; however, Caltrans approval would be required for any encroachments or construction of facilities in a Caltrans right-of-way associated with future projects within the CPU areas.

1.2.2.3 California Department of Fish And Wildlife (CDFW)

An Agreement Regarding Proposed Stream or Lake Alteration (Streambed Alteration Agreement) with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, is under the authority of CDFW pursuant to Section 1600 et seq. of the State Fish and Game Code. The purpose of code Sections 1600-1616 is to protect and conserve fish and wildlife resources that could be substantially adversely affected by a substantial diversion or obstruction of natural flow of, or substantial change or use of material from the bed, bank, or channel of, any river, stream, or lake. Drainages and canyons occurring in the CPU areas may contain streams and wetlands. No permits from CDFW are required at this time; however, development projects, particularly improvements to infrastructure such as water and sewer lines that could occur with implementation of the project, may require review and/or Streambed Alteration Agreements in the future.

1.2.2.4 San Diego Regional Water Quality Control Board (RWQCB)

The RWQCB regulates water quality through the Federal Clean Water Act Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0109266, which consists of wastewater discharge requirements, as well as Waste Discharge Requirements Program, which regulates point discharges not subject to the Federal Water Pollution Control Act Amendments. The RWQCB is responsible for implementing permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff,

including overseeing the development and implementation of Water Quality Improvement Plans as required by the Regional MS4 Permit for parts of the San Diego region, which includes the City, as well as ensuring that all other MS4 Permit requirements are met. No permits from RWQCB are required at this time; however, future development projects within the proposed CPU areas may require review and/or Section 401 certifications.

1.2.2.5 San Diego County Regional Airport Authority (Airport Authority)

The Airport Authority operates the San Diego International Airport (SDIA). The Airport Authority also serves as San Diego County's Airport Land Use Commission (ALUC) and is responsible for land use planning as it relates to public safety surrounding the region's airports. As a Responsible Agency, the Airport Authority, acting as the ALUC, would review future development proposals within the proposed CPU areas and make "consistency determinations" with the provisions and policies set forth in the SDIA Airport Land Use Compatibility Plan (ALUCP) up until the time the ALUC determines the CPUs and zoning consistent with the ALUCP for SDIA. Future development projects within the proposed CPU areas would be subject to the Code of Federal Regulations Part 77 requirement to provide notification to Federal Aviation Administration (FAA) as addressed in the ALUCP for SDIA.

1.3 EIR Type, Scope and Content, and Format

1.3.1 Type of EIR

This EIR has been prepared as a Program EIR, as defined in Section 15168 of the CEQA Guidelines. In accordance with CEQA, this PEIR examines the environmental impacts of the proposed CPUs, which comprise a series of actions. The combined actions can be characterized as one large project for the purpose of environmental review in this PEIR and are herein collectively referred to as the "proposed CPUs or the project". The PEIR focuses on the physical changes in the environment that would result from adoption and implementation of the proposed CPUs and other associated actions described in Chapter 3.0, Project Description, including anticipated impacts that could result during future construction and operation.

1.3.2 PEIR Scope and Content

The scope of analysis for this PEIR was determined by the City as a result of initial project review, as well as consideration of comments received in response to the Notice of Preparation (NOP) circulated December 23, 2013, and a scoping meeting held on January 9, 2014, at Balboa Park (Santa Fe Room), 2150 Pan American Road, San Diego, California 92101. The NOP for analysis of the project, related letters received, and comments made during the scoping meeting are included as Appendix A of this PEIR. Through these scoping activities, the project was determined to have the potential to result in significant environmental impacts to the following subject areas:

- Land Use
- Visual Quality and Neighborhood Character
- Transportation/Traffic Circulation/ Parking
- Air Quality
- Greenhouse Gas Emissions
- Noise
- Historical Resources
- Biological Resources
- Geologic Conditions
- Paleontological Resources
- Hydrology/Water Quality
- Public Services and Facilities
- Public Utilities
- Health and Safety

It should be noted that the NOP for the PEIR included the project as well as the proposed CPU for the Uptown community. As a result of timing related to stakeholder input, the environmental analysis for the Uptown CPU is analyzed in a separate CEQA document and is not addressed in this PEIR.

The intent of this PEIR is to determine whether implementation of the proposed project would have a significant effect on the environment through analysis of each issue identified during the scoping process. The Environmental Analysis for the North Park and Golden Hill CPUs is presented in community-specific sections in this PEIR within Chapters 6.0 and 7.0, respectively. This format is intended to allow the reader to easily select the community of interest and review the environmental impact analysis for that community in one complete chapter.

Each environmental issue area presented in Chapters 6.0 and 7.0 includes a presentation of threshold(s) of significance for the particular issue area based on the CEQA Guidelines and the City's Significance Determination Thresholds (2011); identification of an issue statement; an assessment of potential impacts associated with implementation of the project; a summary of the significance of any impacts; and recommendations for mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area.

Pursuant to CEQA Guidelines Section 15126, all phases—or, in the case of this project, discretionary actions—associated with the proposed CPUs are considered in this PEIR when evaluating potential impacts on the environment, including the construction of future development and operational phases to the extent possible at the program level. Impacts are identified as direct or indirect, and short term or long term, and are assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of each proposed CPU compared to existing ground conditions. The proposed CPU for each community is also compared with the current Community Plan for the respective community in some instances to provide context and background for the analysis.

The PEIR includes all mandatory contents of EIRs as required pursuant to CEQA Guidelines Sections 15120 to 15132. A Cumulative Impacts analysis for each CPU is presented within each of the CPU analysis chapters and is specific to each environmental issue area. Chapter 8.0, Effects Not Found to Be Significant, presents a brief discussion of environmental effects that were evaluated as part of the initial scoping and review process for the project and were found not to be potentially significant. Chapter 9.0 presents a discussion of Growth Inducement, and Chapter 10.0 presents a discussion of Significant Irreversible Environmental Changes.

Chapters 11.0 and 12.0 of this PEIR include a discussion of Alternatives that could avoid or reduce potentially significant environmental effects associated with implementation the project. Chapter 11.0 presents alternatives to the North Park CPU, while Chapter 12.0 presents alternatives to the Golden Hill CPU. Alternatives discussed in the PEIR for both the North Park and Golden Hill CPU include the No Project Alternative, Lower-Density Alternative, and a Higher-Density Alternative. For the purposes of this PEIR, the No Project Alternative would be the continued implementation of the adopted Community Plans with the same land uses as identified in them.

1.3.3 PEIR Format

The format and order of contents of this PEIR follow the direction in the City's EIR Guidelines. A brief overview of the various chapters of this PEIR is provided below.

- **Executive Summary (CEQA Guidelines Section 15123).** Provides a summary of the PEIR, a brief description of the project, identification of areas of controversy, issues to be resolved by the decision-makers, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and significance of impact after mitigation. A summary of the project alternatives and comparison of the potential impacts of the alternatives with those of the project is also provided.

- **Chapter 1.0, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content.

- **Chapter 2.0, Environmental Setting (CEQA Guidelines Section 15125).** Provides a description of the project's regional context, location, and existing physical characteristics and land use within the proposed CPU areas. An overview of available public infrastructure and services, as well as relationship to relevant plans, is also provided in this section. The Environmental Setting chapter is detailed, providing background information relevant to each environmental issue area further addressed in Chapters 6.0 and 7.0. Within the CPU impact analysis chapters (Chapters 6.0 and 7.0), the applicable environmental setting discussion contained in Chapter 2.0 is referenced to avoid repetition.

- **Chapter 3.0, Project Description (CEQA Guidelines Section 15124).** Provides a detailed discussion of the project, including background, objectives, key features, and environmental design considerations.

- **Chapter 4.0, History of Project Changes.** Provides a summary of the origin and subsequent revisions of the project throughout the life of the project.

- **Chapter 5.0, Regulatory Framework.** To reduce the amount of redundant description of the regulations associated with individual environmental topics that would be the same for each CPU area (e.g., noise regulations), the Regulatory Framework for each environmental topic is presented in this chapter. Within the CPU impact analysis chapters (Chapters 6.0 and 7.0), the applicable regulatory framework discussion contained in Chapter 5.0 is referenced.

- **Chapters 6.0 and 7.0, Environmental Analysis (CEQA Guidelines Section 15126).** These chapters provide a detailed community-specific evaluation of potential environmental

impacts associated with the project as it relates to each community considered in this PEIR for environmental issues determined through the initial review and public scoping processes to be potentially significant. Chapters 6.0 and 7.0 begin with the issue of land use, followed by the remaining issues in order of significance. This order is the same for both analysis chapters. The analysis of each issue begins with a reference to the environmental setting and regulatory framework provided in Chapters 2.0 and 5.0, respectively and a statement of specific thresholds used to determine significance of impacts, followed by an evaluation of potential impacts, including cumulative impacts. If significant impacts are identified, feasible mitigation measures to avoid or reduce any significant impacts are identified. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is provided.

- **Chapter 8.0, Effects Found Not to Be Significant.** Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant for the proposed CPUs and briefly summarizes the basis for these determinations. For the project, it was determined that environmental issues associated with Agricultural Resources, Mineral Resources, and ~~Energy~~ Population and Housing would not be significant and, therefore, are summarized in Chapter 8.0.

- **Chapter 9.0, Growth Inducement (CEQA Guidelines Section 15126.2(d)).** Evaluates the potential influence the project may have on economic or population growth within the proposed CPU areas, as well as the region, either directly or indirectly.

- **Chapter 10.0, Significant Unavoidable Environmental Effects/Significant Irreversible Environmental Changes (CEQA Guidelines Section 15126(b) and (c)).** Provides a summary of any significant and unavoidable impacts of the project as detailed in Chapters 6.0 (North Park) and 7.0 (Golden Hill). This chapter also describes the potentially significant irreversible changes that may be expected and addresses the use of nonrenewable resources during project implementation.

- **Chapter 11.0, North Park Alternatives (CEQA Guidelines Section 15126.6).** Provides a description of alternatives to the North Park CPU, including the No Project Alternative, Lower-Density Alternative, and a Higher-Density Alternative.

- **Chapter 12.0, Golden Hill Alternatives (CEQA Guidelines Section 15126.6).** Provides a description of alternatives to the Golden Hill CPU, including the No Project Alternative, Lower-Density Alternative, and a Higher-Density Alternative.

- **Chapter 13.0, Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the PEIR for the project.

- **Chapter 14.0, References.** Lists all of the reference materials cited in the PEIR.

- **Chapter 15.0, Individuals and Agencies Consulted (CEQA Guidelines Section 15129).** Identifies all of the individuals and agencies contacted during preparation of the PEIR.

- **Chapter 16.0, Certification.** Identifies all of the agencies, organizations, and individuals responsible for the preparation of the PEIR.

Technical reports, used as a basis for much of the environmental analysis in the PEIR, have been summarized in the PEIR and are included as appendices to this PEIR. The technical reports prepared for the project and their location in the PEIR are listed in the table of contents. Availability of the Draft PEIR and the technical appendices is discussed in Section 1.4.1, Draft PEIR.

1.3.4 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this PEIR, and their relationship to this PEIR is described. These documents are included in Section 14.0, References, are hereby incorporated by reference, and are available for review at the City Planning Department, located at 1010 Second Avenue, Suite 1200, San Diego, California 92101. Included within the list of materials incorporated by reference into this PEIR are the following:

- City of San Diego General Plan (City of San Diego 2008)
- City of San Diego Program Environmental Impact Report for the General Plan (Final PEIR) (City of San Diego 2007)
- City of San Diego Housing Element FY2013–FY2020 (City of San Diego 2013)
- City of San Diego Municipal Code (City of San Diego 2008)
- City of San Diego Greater North Park Community Plan, as amended (City of San Diego 1986)
- City of San Diego Golden Hill Community Plan, as amended (City of San Diego 1988)
- Greater North Park Community Plan Area Historic Resources Survey
- Greater Golden Hill Community Plan Area Historic Resources Survey

1.4 PEIR Process

The City, as lead agency, is responsible for the preparation and review of this PEIR. The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, while the second stage is the Final PEIR.

1.4.1 Draft PEIR

In accordance with the City's Municipal Code Section 128.0306 and CEQA Guidelines Section 15105, the Draft PEIR is distributed for review to the public and interested and affected agencies for a review period of 45 days. The purpose of the review period is to allow the public an opportunity to provide comments "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 and mitigated" (Section 15204, CEQA Guidelines). City Municipal Code Section 128.0307 allows the Planning Director to approve requests for additional public review time from the affected officially recognized community planning group, in this case the North Park Community Planning Group or the Golden Hill Community Planning Group. Approval of additional review time shall not exceed 14 calendar days. Both Planning Groups have requested additional review time and those

requests have been granted by the Planning Director. ~~Thus, a 59-day comment period is applicable to the North Park and Golden Hill Community Planning Groups only.~~

In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft PEIR, a Notice of Completion is filed with the State Office of Planning and Research and a Notice of Availability of the Draft PEIR issued in the Daily Transcript, a newspaper of general circulation in the area.

The Draft PEIR and all related technical studies are available for review during the public review period at the offices of the Planning Department, located at 1010 Second Avenue, Suite 1200, San Diego, California 92101, and on the Planning Department website for CEQA Policy and Review:

http://www.sandiego.gov/planning/programs/ceqa/

The North Park and Golden Hill Community Plan Updates websites are:

North Park:

http://www.sandiego.gov/planning/community/profiles/greaternorthpark/index.shtml

Golden Hill:

http://www.sandiego.gov/planning/community/profiles/greatergoldenhill/index.shtml

Copies of the Draft PEIR are also available at the following public libraries:

San Diego Central Library
330 Park Boulevard
San Diego, California 92101

University Heights Branch Library
4193 Park Boulevard
San Diego, California 92103

Mission Hills Branch Library
925 West Washington Street
San Diego, California 92103

North Park Branch Library
3795 31st Street
San Diego, California 92104

1.4.2 Final PEIR

Following the end of the public review period, the City, as lead agency, will provide written responses to comments received on the Draft PEIR per CEQA Guidelines Section 15088. All comments and responses will be considered in the review of the PEIR. Detailed responses to the comments received during public review, a Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations for any impacts identified in the PEIR as significant and unavoidable will be prepared and compiled as part of the PEIR finalization process. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR, which includes the MMRP, Findings, and Statement of Overriding Considerations, as being complete and in accordance with CEQA. The Final PEIR will be available for public review at least 14 days before the City Council public hearing in order to provide commenters the opportunity to review the written responses to their comment letters.



Chapter 2
Environmental Setting

The North Park and Golden Hill communities are located adjacent to each other, and many of the components typically discussed as part of the Environmental Setting chapter have common elements across both communities. As a result, where the environmental setting discussion would be the same for each Community Plan Update (CPU) area, this chapter provides a consolidated discussion of the existing environmental setting for both CPU areas as it related to each issue area analyzed in Chapters 6.0 and 7.0. Where CPU specific discussion of environmental setting is warranted, it is provided in the appropriate environmental analysis chapter.

2.1 Regional Location

The North Park and Golden Hill CPU areas are centrally located to the north and east of Downtown San Diego and south of the Mission Valley community (Figure 2-1 and 2-2). The North Park Community Plan area forms a portion of the northern and eastern boundaries of Balboa Park; while the Golden Hill Community Plan area forms portions of the Park's eastern and southern boundaries.

Each community is situated within the same landform that is part of a broad mesa interspersed with many natural and/or semi-developed canyons, allowing a distinctive combination of outward views and interaction with open space along most community edge points. The canyons, which geographically connect to Mission Valley to the north and interconnect the two CPU communities, are present throughout both the North Park and Golden Hill communities and simultaneously offer relief from the built environment and a barrier to connections – pedestrian, bicycle, vehicular, and intra/inter-community. The canyon landform also creates a sense of seclusion from the surrounding City not uncommon for San Diego's neighborhoods and helps support the interconnectedness between the two communities located on the broad mesa landform.

Major transportation corridors traverse the communities, connecting downtown San Diego to other communities in the City, as well as the region. As development radiated out from Downtown along streetcar lines, later forming commercial districts along arterial streets and major crossings,



Community Plan Boundaries

North Park

Golden Hill

FIGURE 2-1

Regional Location

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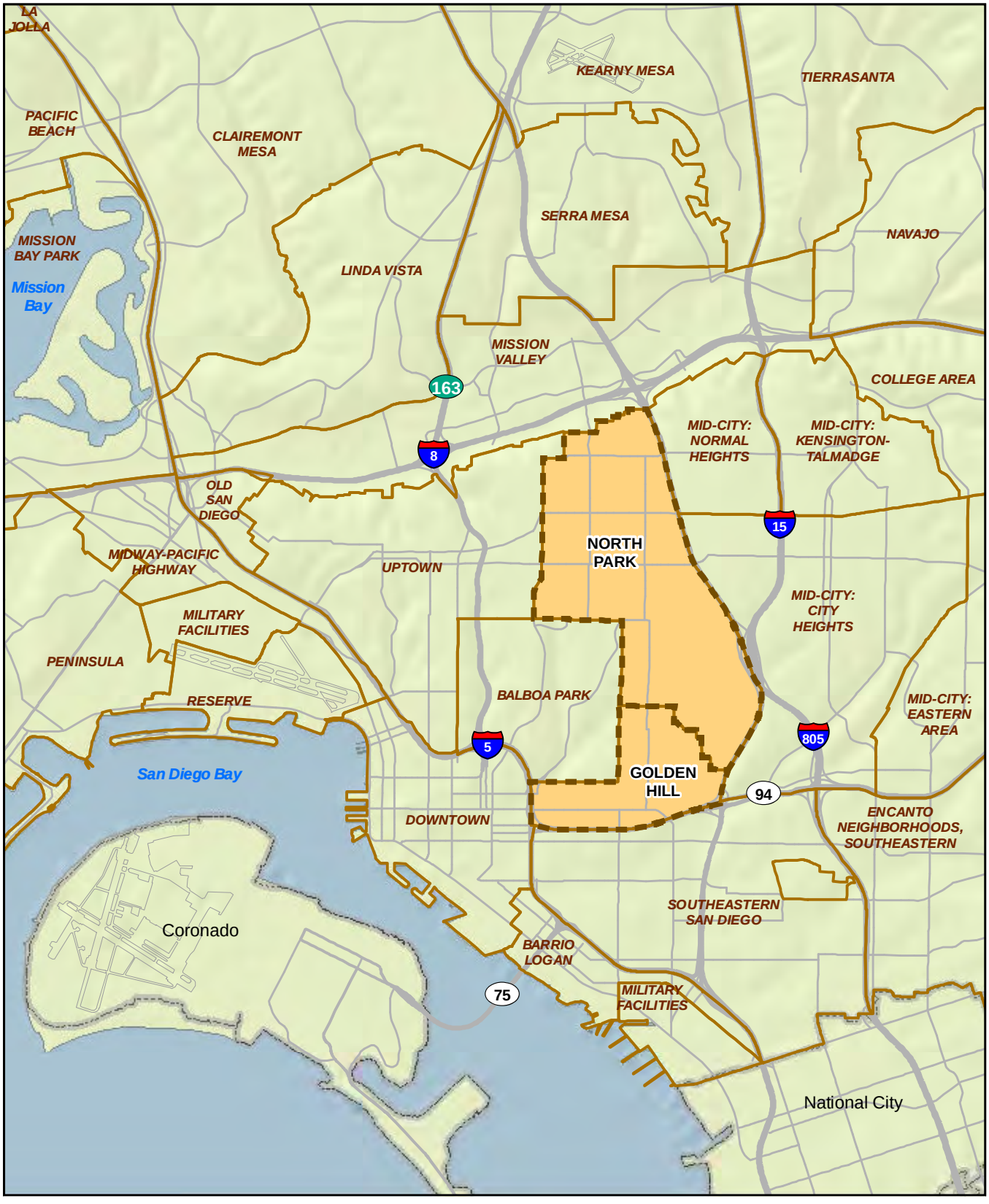


FIGURE 2-2

North Park and Golden Hill Communities – Vicinity Map

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traditional storefronts associated with small and sole-proprietor businesses remain. A grid pattern of streets has developed in both communities. Vehicular access is affected at many "pinch points" in the communities where street widths narrow or access is "funneled" due to canyon and freeway interfaces.

The CPU areas are urbanized and generally characterized as a mix of residential, commercial, and institutional areas. Both the North Park and the Golden Hill communities have also been part of one of the longest historical development periods in the region due to their central location and various land use plans and zoning programs, which has left a variety of building forms and architectural styles as well as potential historic resources. Both communities developed prior to current Citywide public facilities standards. As a result, locating and financing new facilities, such as parks, is difficult due to lack of available land as well as a limited rate of new development. Aging infrastructure in these communities often needs to be upgraded and/or replaced.

2.2 Project Locations

2.2.1 North Park Community Plan Update Area

The North Park CPU area (North Park community or North Park) comprises approximately 2,300 acres (approximately 3.6 square miles) and is located in the central portion of the City of San Diego and is in close proximity to Downtown San Diego (Figure 2-3). North Park abuts the community planning areas of Uptown on the west, Mission Valley on the north, Mid-City on the east, and Golden Hill and Balboa Park on the south. North Park is defined by its mesa tops with canyon and hillside areas. The majority of North Park is relatively flat or gently sloping with pronounced hillside areas located in the northern boundary of the community adjacent to Mission Valley and the southeastern portion of the community adjacent to Golden Hill. North Park contains the neighborhoods of Altadena, Burlingame, Montclair, North Park, and University Heights.

2.2.2 Golden Hill Community Plan Update Area

The Golden Hill CPU area (Golden Hill community or Golden Hill) is an urbanized community consisting of approximately 750 acres (approximately 1.2 square miles), located east of downtown San Diego and adjacent to Balboa Park. It comprises the Golden Hill and South Park neighborhoods. The Golden Hill community boundary is Balboa Park and Juniper Street on the north, 32nd Street between Juniper Street and Hawthorn Street, then along Marlton Drive to the 34th Street canyon to Beech Street on the east, State Route 94 (SR-94) on the south and Interstate 5 (I-5) on the west (Figure 2-4).

Map Source: SanGIS

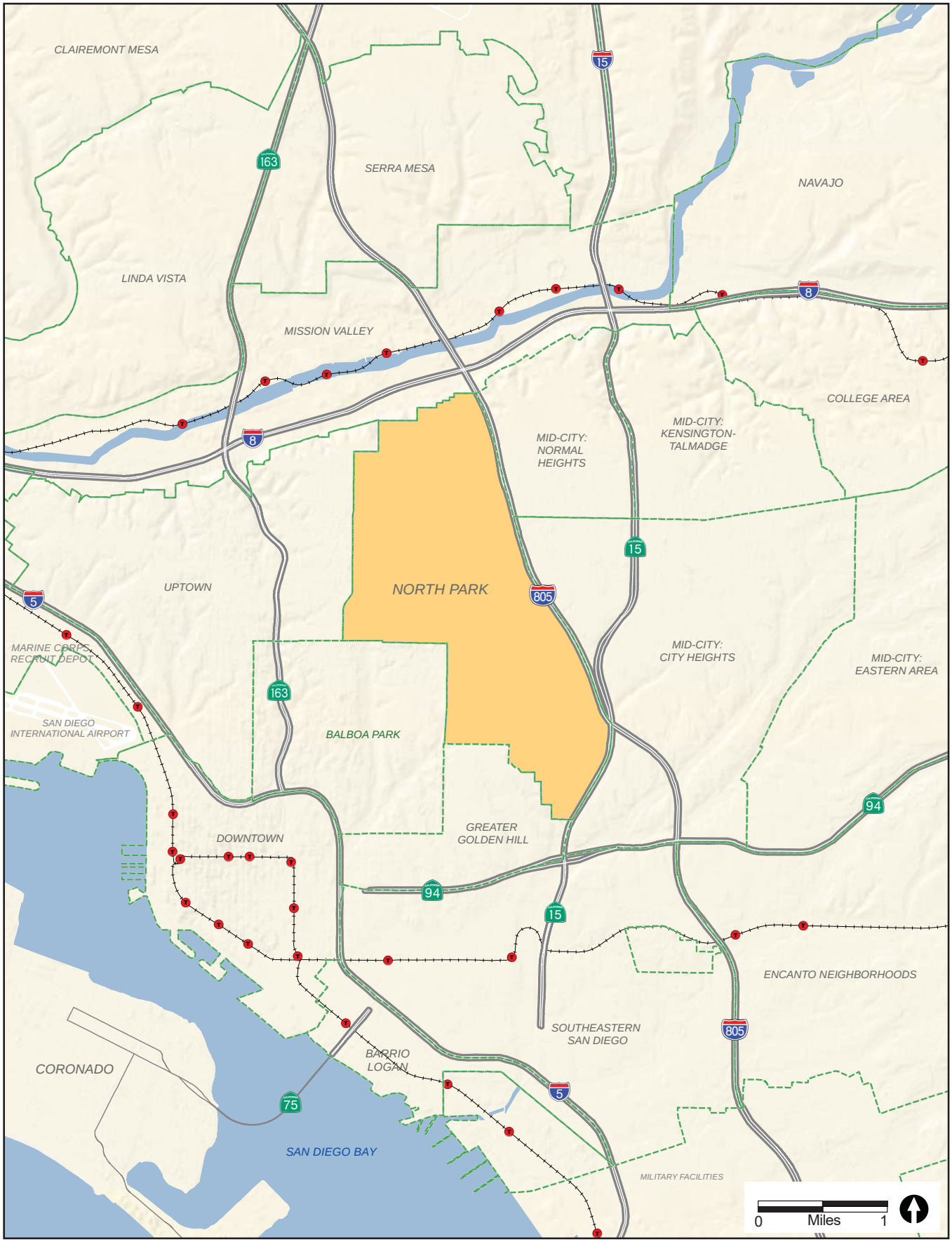


FIGURE 2-3
Geologic Hazards – Golden Hill

Map Source: SanGIS



FIGURE 2-4
Community Plan Update Area – Golden Hill

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2.3 Existing Physical Characteristics

2.3.1 Land Use

2.3.1.1 North Park Community Plan Update Area

The North Park community is an older urbanized community, with original subdivisions being recorded just after the turn of the twentieth century. The CPU area is traversed by two major east-west streets (University Avenue and El Cajon Boulevard) with Adams Avenue, also an east-west street, serving the northern portion of the CPU. Park Boulevard, which serves as the community's western boundary, as well as 30th Street and Texas Street are north-south streets of significance within the community.

a. Existing Land Uses

North Park land uses include single-family, multi-family, open space, commercial/mixed-use, park, and institutional uses. Commercial/mixed use areas are located along the major commercial-transit corridors of the community, and multi-family residential uses occupy the center of the community and transitioning in intensity away from the main commercial corridors. Single-family land uses are primarily located in the northern and southern ends of the community along with the community's open spaces areas. Institutional uses within the community are primarily in the form of public and private schools located throughout the community, along with a fire station and two libraries located in the eastern half of the community.

North Park has a limited amount of vacant parcels. As shown in Table 2-1, single-family land uses make up approximately 657 acres or 29 percent of the total acres within the community and are the predominant land uses within the North Park community. Multi-family use, which occupies the central core of the community, accounts for approximately 501 acres or 22 percent of the total acreage in the community. Commercial uses, including employment, retail, and services, cover approximately 80 acres or four percent of the total area within the community, mostly in the form of strip commercial development. Table 2-1 summarizes North Park's existing land uses and acreages.

b. Surrounding Land Uses

To the north, North Park is bordered by the south slope of Mission Valley, which, in combination with the topographical differential, functions as an open area between the North Park and Mission Valley communities. To the south, North Park is adjacent to Balboa Park and the Golden Hill community. To the east, North Park is adjacent to Interstate 15 (I-15) and Interstate 805 (I-805), creating a separation between North Park and the Mid-City Communities. To the west, North Park abuts Balboa Park and the Uptown community.

Table 2-1 North Park Existing Land Uses	
General Plan Land Use Category	Acres
Education	28
Industrial	1
Institutional	23
Multi Family	501
Office Commercial	10
Open Space	159
Parking	12
Parks	15
Recreation	3
Retail Commercial	80
Roads	753
Single Family	657
Vacant	12
Visitor Commercial	3
Total Acreage	2,258

2.3.1.2 Golden Hill Community Plan Update Area

Golden Hill is a community located adjacent to Balboa Park and in close proximity to Downtown, North Park, Southeastern San Diego and City Heights. The Golden Hill community has a long-standing history and is comprised of distinct neighborhoods based upon geographic and historic subdivision patterns. Initial development within the Golden Hill community began in January 1870, with the subdivision of a large parcel of land in the western section, Subdivision Map No. 249 Culverwell and Taggarts Addition extending to 23rd Street. Golden Hill was then at the fringe of San Diego's urban development and offered large lots with views. Following several boom and bust periods, Golden Hill began to come into its own and was one of the most fashionable places to live. In the 1910s, it became one of the many San Diego neighborhoods connected by streetcars. By the early 1920s, central Golden Hill was almost completely developed. Since that time a number of changes have occurred; however, the area retains a remarkable number of structures in excess of 60 years of age that are prime examples of architectural styles of their times.

a. Existing Land Uses

Golden Hill is predominantly a residential community with retail commercial and institutional uses providing a support function, although more recently restaurants attract people from a broader area to the community. Table 2-2 summarizes Golden Hill's existing land uses and acreages.

Table 2-2 Golden Hill Existing Land Uses	
General Plan Land Use Category	Acres
Education	9
Industrial	6
Institutional	9
Multi Family	96
Office Commercial	2
Open Space	58
Parking	1
Recreation	0
Retail Commercial	13
Roads	281
Single Family	251
Transportation/Utilities	6
Vacant	14
Total Acreage	746

b. Surrounding Land Uses

The Golden Hill community is located in an urbanized portion of the City of San Diego. To the north, Golden Hill is bordered by Balboa Park and North Park. To the south, Golden Hill is separated from the Southeastern San Diego communities by SR-94. To the east, the City Heights community is situated beyond I-15. To the west, Golden Hill is bordered by Balboa Park and is separated from Downtown by I-5.

2.3.2 Visual Effects and Neighborhood Character

The existing conditions related to visual effects and neighborhood character are discussed within the respective analysis chapters for each community, chapter 6.2 for North Park and 7.2 for Golden Hill since each neighborhood has a distinct visual environment and character.

2.3.3 Transportation and Circulation

The North Park and Golden Hill communities are identified in the General Plan's Land Use and Street System Map (contained in the Land Use and Community Planning Element, Figure LU-2). Traffic circulation patterns within the North Park and Golden Hill communities are reflective of the fact that freeways and/or highways form the southern and eastern boundary of the North Park community (I-805) and the southern boundary of the Golden Hill community (SR-94) and another freeway (I-8) is just to the north of the North Park community, resulting in the use of local roads for trucking and transport of goods between the freeways.

2.3.3.1 Roadways and Access

Freeway and/or highway access in the vicinity of the North Park and Golden Hill communities is provided via I-5, I-15, I-805, and State Route (SR-163), which are north-south routes, and SR-94, which is an east-west route. I-8 is an east-west freeway located just north of the North Park community. These facilities improve regional accessibility and separate the North Park and Golden Hill communities from central San Diego. Due to the topography of the North Park and Golden Hill communities, in many places, these facilities are below-grade to the surrounding developed land uses.

Major roadways within the North Park and Golden Hill communities generally run in an east-west direction. The most prominent are El Cajon Boulevard, University Avenue and Adams Avenue in North Park; and Broadway in Golden Hill. Prominent north-south roadways include Park Boulevard, which runs through North Park; and 30th Street, which runs through North Park and Golden Hill. Traffic on several roadway segments within the North Park and Golden Hill communities currently exceeds acceptable levels as defined by City thresholds.

2.3.3.2 Public Transportation

The City works with local agencies to provide transportation systems for its residents and visitors. Bus (including Bus Rapid Transit) and trolley service, as well as commuter rail stations, are served by the San Diego Metropolitan Transit System and the North County Transit District. The North Park and Golden Hill communities are bus service operated by the San Diego Metropolitan Transit System.

a. ~~Bus~~ Rapid Transit ~~(BRT)~~

~~BRT~~ Rapid transit is corridor-level service providing fast and frequent transit services that are designed to take advantage of freeway improvements such as High Occupancy Vehicle and managed lanes and arterial improvements in order to serve longer distance regional trips. The rapid service on arterials will operate on arterial roadways and provide limited-stop, high-speed service along several key corridors throughout the region, supplementing existing local bus services.

b. Light Rail Transit (LRT)

LRT is a type of transit vehicle and service that uses steel wheels and operates over railroad tracks. LRT systems generally serve stations averaging one-mile apart, are not remotely controlled, and can operate in a separated right of way or on public streets. The San Diego Trolley is a LRT system.

~~c. Rapid Bus (also known as Arterial Rapid Transit)~~

~~Rapid Bus or Arterial Rapid Transit (ART) provides rapid and frequent transit service along arterials that use signal priority and queue jumper lanes at major intersections.~~

~~d~~c. Streetcar

Streetcars are electric-powered rail vehicles designed for short-distance trips with station spacing every few blocks or every quarter-mile on average. Typical speeds are up to the speed limit of the street they operate on, generally averaging 12 miles per hour (mph; with stops). They are designed for dense urban areas, such as downtown areas and they integrate well with street traffic, signals, and pedestrians. They operate either in mixed traffic with automobiles or on a dedicated right of way and would accommodate up to 100 passengers per car.

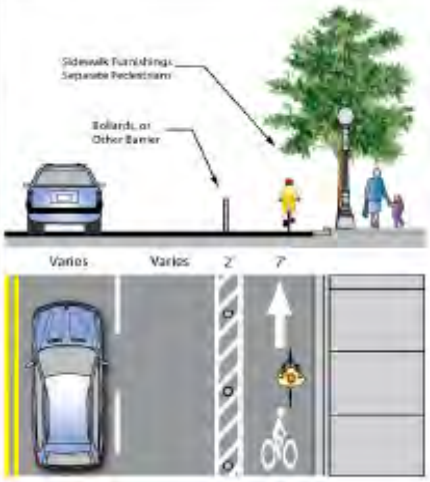
2.3.3.3 Rail

In addition to the local light rail system, the San Diego and Imperial Valley Railroad operates at night along separate tracks paralleling the trolley tracks, and the Burlington Northern Santa Fe Railroad operates freight trains on separate tracks located west of Harbor Drive (City of San Diego 2013).

2.3.3.4 Bicycle Facilities

Types of bicycle facilities include bicycle boulevards, bicycle paths (Class I), bicycle lanes (Class II), bicycle routes (Class III), and cycle tracks (Class IV). Bicycle boulevards and cycle tracks are additional facilities that are not defined by the California Department of Transportation (Caltrans) and are not part of the existing bicycle network in either the North Park or Golden Hill communities (Table 2.3).

Table 2.3
Regional Corridor Classification System

Cycle Tracks A cycle track is a hybrid type bicycle facility that combines the experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks are bikeways located in roadway right-of-way but separated from vehicle lanes by physical barriers or buffers. Cycle tracks provide for one-way bicycle travel in each direction adjacent to vehicular travel lanes and are exclusively for bicycle use. **Cycle tracks are not recognized by Caltrans Highway Design Manual as a bikeway facility.** Development of cycle track on segments of the regional corridor system is proposed through experimental, pilot projects.	
Bicycle Boulevards Bicycle boulevards are local roads or residential streets that have been enhanced with traffic calming and other treatments to facilitate safe and convenient bicycle travel. Bicycle boulevards accommodate bicyclists and motorists in the same travel lanes, typically without specific vehicle or bicycle lane delineation. These roadway designations prioritize bicycle travel above vehicular travel. The treatments applied to create a bike boulevard heighten motorists' awareness of bicyclists and slow vehicle traffic, making the boulevard more conducive to safe bicycle and pedestrian activity. Bicycle boulevard treatments include signage, pavement markings, intersection treatments, traffic calming measures and can include traffic diversions. **Bicycle boulevards are not defined as bikeways by Caltrans Highway Design Manual; however, the basic design features of bicycle boulevards comply with Caltrans standards.**	

2.3.4 Air Quality

The North Park and Golden Hill communities are located within the San Diego Air Basin (SDAB) of the San Diego Air Pollution Control District (APCD), between 0.5 mile and four miles northeast of the San Diego Bay. Air quality conditions and local climate are described in this section.

2.3.4.1 Climate

The San Diego region, including the North Park and Golden Hill communities, is influenced by proximity to the Pacific Ocean and semi-permanent high-pressure systems that result in warm, dry summers and mild, occasionally wet winters. The CPU areas are subject to frequent offshore breezes. The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds blowing pollutants away from the coast toward inland areas.

The CPU areas, like the rest of San Diego County's coastal areas, have a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The mean annual temperature at San Diego International Airport (SDIA), recorded near downtown San Diego and the North Park and Golden Hill communities, is 64 degrees Fahrenheit (°F). The average annual precipitation for the area is approximately 10 inches, falling primarily from November to April. Winter low temperatures in the North Park and Golden Hill communities averages about 49°F, and summer high temperatures average about 74°F based on the measurements taken at the San Diego International Airport.

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

Fluctuations in the strength and pattern of winds from the Pacific High Pressure Zone interacting with the daily local cycle produce periodic temperature inversions that influence the dispersal or containment of air pollutants in the SDAB. Beneath the inversion layer pollutants become "trapped" as their ability to disperse diminishes. The mixing depth is the area under the inversion layer. Generally, the morning inversion layer is lower than the afternoon inversion layer. The greater the change between the morning and afternoon mixing depths, the greater the ability of the atmosphere to disperse pollutants.

Throughout the year, the height of the temperature inversion in the afternoon varies between approximately 1,500 and 2,500 feet above mean sea level (MSL). In winter, the morning inversion layer is about 800 feet above MSL. In summer, the morning inversion layer is about 1,100 feet above MSL. Therefore, air quality generally tends to be better in the winter than in the summer.

The prevailing westerly wind pattern is sometimes interrupted by regional "Santa Ana" conditions. A Santa Ana occurs when a strong high pressure develops over the Nevada to Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea.

Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or during breakdown of these conditions or if the Santa Ana is weak, local air quality may be adversely affected. In these cases, emissions from the South Coast Air Basin (SCAB) to the north are blown out over the ocean, and low pressure over Baja California draws this pollutant-laden air mass southward. As the high pressure weakens, prevailing northwesterly winds reassert themselves and send this cloud of contamination ashore in the SDAB. When this event does occur, the combination of transported and locally produced contaminants produce the worst air quality measurements recorded in the basin.

2.3.4.2 Existing Air Quality

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the basin. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by the CARB or federal standards set by the U.S. EPA. The San Diego APCD maintains 11 air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these 11 stations. Measurements are then used by scientists to help forecast daily air pollution levels.

The air quality monitoring station nearest the CPU areas is the San Diego-Beardsley Street monitoring station that is located at 1110 Beardsley and monitors the following pollutants: O_3, CO, NO_2, and PM_{10} and $PM_{2.5}$. The SO_2 monitors were decommissioned in 2012, as this pollutant is less of a concern in the SDAB. Table 2-4 provides a summary of measurements of O_3, CO, SO_2, NO_2, PM_{10}, and $PM_{2.5}$ collected at the Beardsley Street monitoring station for the years 2010 through 2014.

2.3.4.3 Regional Background Toxic Air Pollutants

The San Diego APCD samples for toxic air contaminants at the El Cajon and Chula Vista monitoring stations. Excluding diesel particulate emissions, data from these stations indicate that the background cancer risk in 2008 due to air toxics was 135 in one million in Chula Vista and 150 in one million in El Cajon. There is no current methodology for directly measuring diesel particulate concentrations. Based on California Air Resources Board (CARB) estimates, diesel particulate emissions could add an additional 420 in one million to the ambient cancer risk levels in San Diego County.

Thus the combined background ambient cancer risk due to air toxics in the urbanized areas of San Diego County could potentially range from around 555 to 570 in one million. As such, diesel particulate matter is the air toxic of primary concern on a regional basis.

Table 2-4
Summary of Air Quality Measurements Recorded at the San Diego–1110 Beardsley Street Monitoring Station

Pollutant/Standard	2010	2011	2012	2013	2014
Ozone					
Days State 1-hour Standard Exceeded (0.09 ppm)	0	0	0	0	1
Days Federal 8-hour Standard Exceeded (0.075 ppm)	0	0	0	0	0
Days State 8-hour Standard Exceeded (0.07 ppm)	0	0	0	0	2
Max. 1-hr (ppm)	0.078	0.082	0.071	0.063	0.093
Max. 8-hr (ppm)	0.066	0.061	0.065	0.053	0.072
Carbon Monoxide					
Days Federal 8-hour Standard Exceeded (35 ppm)	0	0	0	0	0
Days State 8-hour Standard Exceeded (20 ppm)	0	0	0	0	0
Max. 1-hr (ppm)	2.8	2.8	2.6	3.0	2.7
Max. 8-hr (ppm)	NA	NA	NA	NA	NA
Nitrogen Dioxide					
Days Federal 1-hour Standard Exceeded (0.10 ppm)	0	0	0	0	0
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Max 1-hr (ppm)	0.077	0.067	0.065	0.072	0.075
Annual Average (ppm)	0.015	0.014	0.013	0.014	0.026
Sulfur Dioxide[a]					
Days State 24-hour Standard Exceeded (0.04 ppm)	0	0	NA	NA	NA
Max 24-hr (ppm)	0.002	0.003	NA	NA	NA
Annual Average (ppm)	0.000	NA[b]	NA	NA	NA
PM_{10}					
Days State 24-hour Standard Exceeded (50 $\mu g/m^3$)[b]	0	0	0	6	4
Days Federal 24-hour Standard Exceeded (150 $\mu g/m^3$)	0	0	0	0	NA
Max. Daily—Federal ($\mu g/m^3$)	40.0	48.0	45	90	NA
Max. Daily—State ($\mu g/m^3$)	40.0	49.0	47	92	59.0
Federal Annual Average ($\mu g/m^3$)	22.8	23.3	21.8	24.9	NA
State Annual Average ($\mu g/m^3$)	23.4	24.0	22.2	25.4	NA
$PM_{2.5}$					
Days Federal 24-hour Standard Exceeded (35 $\mu g/m^3$)[b]	0	0	1	1.1	1
Max. Daily—Federal ($\mu g/m^3$)	29.7	34.7	39.8	37.4	37.2
Max. Daily—State ($\mu g/m^3$)	31.0	35.5	39.8	37.4	37.2
Federal Annual Average ($\mu g/m^3$)	10.4	10.8	11.0	10.3	NA
State Annual Average ($\mu g/m^3$)	NA	10.9	NA	10.4	NA

SOURCE: State of California 2015b

NA = Not available.

[a]The SO_2 monitor was decommissioned on June 30, 2011.

[b]Calculated days. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. Particulate measurements are collected every six days. The number of days above the standard is not necessarily the number of violations of the standard for the year.

2.3.5 Greenhouse Gas Emissions

The North Park and Golden Hill CPU areas are currently a source of anthropogenic greenhouse gas (GHG), with emissions generated by vehicular traffic and by the energy use, water use, and solid waste disposal practices of existing development.

2.3.5.1 State and Regional GHG Inventories

a. CARB Inventory

The CARB performs statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high global warming potential (GWP) emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in million metric tons of CO_2 equivalent (MMT CO_2E). Table 2-5 shows the estimated statewide GHG emissions for the years 1990, 2008, and 2012.

As shown in Table 2-5, statewide GHG source emissions totaled approximately 427 MMT CO_2E in 1990, 487 MMT CO_2E in 2008, and 459 MMT CO_2E in 2012. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. CARB has adopted multiple GHG emission reduction measures, and most of the reductions since 2008 have been driven by economic factors (recession), previous energy-efficiency actions, and the Renewables Portfolio Standard. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. The forestry sector is unique because it not only includes emissions associated with harvest, fire, and land use conversion (sources), but also includes removals of atmospheric CO_2 (sinks) by photosynthesis, which is then bound (sequestered) in plant tissues.

Table 2-5 California GHG Emissions by Sector in 1990, 2008, and 2012			
Sector	1990[1] Emissions in $MMTCO_2E$ (% total)[2]	2008[3] Emissions in $MMTCO_2E$ (% total)[2]	2012 Emissions in $MMTCO_2E$ (% total)[2]
Sources			
Agriculture	23.4 (5%)	37.99 (8%)	37.86 (8%)
Commercial	14.4 (3%)	13.37 (3%)	14.20 (3%)
Electricity Generation	110.6 (26%)	120.15 (25%)	95.09 (21%)
High GWP	--	12.87 (3%)	18.41 (4%)
Industrial	103.0 (24%)	87.54 (18%)	89.16 (19%)
Recycling and Waste	--	8.09 (2%)	8.49 (2%)
Residential	29.7 (7%)	29.07 (6%)	28.09 (6%)
Transportation	150.7 (35%)	178.02 (37%)	167.38 (36%)
Forestry (Net CO_2 flux)	-6.69	--	--
Not Specified	1.27	--	--
TOTAL	426.6	487.10	458.68

SOURCE: California Energy Commission (CEC) 2014, CARB 2007 & 2014a
[1]1990 data was retrieved from the CARB 2007 source.
[2]Percentages may not total 100 due to rounding.
[3]2008 and 2012 data was retrieved from the CARB 2014a source.
[4]Reported emissions for key sectors. The inventory totals for 2008 and 2012 did not include Forestry or Not Specified sources.

b. City of San Diego CAP Inventory

A San Diego regional emissions inventory prepared as part of the City of San Diego's Climate Action Plan (CAP), reported GHG emissions totaling approximately 13 MMT CO_{2e} in 2010. Similar to the statewide emissions, transportation-related GHG emissions contributed the most citywide, followed by emissions associated with energy use.

2.3.6 Noise

2.3.6.1 Existing Noise Environment

Noise sensitive receptors are land uses for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common noise sensitive uses include: residences, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child-care facilities, and certain types of passive recreational parks and open space. Existing noise sources in the CPU areas are motor vehicle and stationary sources. Stationary noise sources include industrial and commercial operations. Noise from these sources can conflict with existing noise sensitive receptors in the CPU areas.

2.3.6.2 Fundamentals of Noise

Sound propagation (i.e., the passage of sound from a noise source to a receiver) is influenced by several factors including the distance from the source, geometric spreading, ground absorption and atmospheric effects, as well as shielding by natural and/or manmade features. Noise is unwanted or disturbing sound.

The noise descriptors used in the environmental analysis (Chapters 6.0 and 7.0) are the decibel (dB), A-weighted decibel (dBA), 1-hour average-equivalent noise level (Leq), and the community noise equivalent level (CNEL). The hourly equivalent sound level (Leq) is the average dBA sound level over a 1-hour period. A-weighting is a frequency correction that often correlates well with the subjective response of humans to noise. Similar to Leq, the CNEL is a 24-hour average A-weighted decibel sound level. However, CNEL also incorporates a 5 dBA penalty to sound levels occurring between 7:00 p.m. and 10:00 p.m., and 10 dBA penalty to sound levels occurring between 10:00 p.m. and 7:00 a.m. The additional 5 dBA and 10 dBA penalties during evening and nighttime hours, respectively, are intended to account for the added sensitivity of humans to noise during these time periods. For example, although a noise level of 60 dBA is typically considered acceptable during the day, during rest hours that same 60 dBA noise level may be considered a nuisance. CNEL values are typically used in land use planning to evaluate the compatibility of adjacent land uses.

The subsections below further describe elements and measures of noise.

a. Frequency and Hertz

A continuous sound can be described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch, like the low notes on a piano, whereas high-frequency sounds are high in pitch, like the high notes on a piano. Frequency is expressed in terms of oscillations, or cycles, per second. Cycles per second are commonly referred to as Hertz (Hz). High frequencies are sometimes more conveniently expressed in units of kilo-Hertz (kHz) or thousands of Hertz. The extreme range of frequencies that can be heard by the healthiest human ear spans from 16 to 20 Hz on the low end to about 20,000 Hz (or 20 kHz) on the high end.

b. Sound Pressure Levels and Decibels

The amplitude of a sound determines its loudness. Loudness of sound increases and decreases with its amplitude. Sound pressure levels are described in units called the decibel. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

c. A-weighted Decibels

The human ear is not equally sensitive to all frequencies within the sound spectrum. Human hearing is limited not only in the range of audible frequencies but also in the way it perceives the sound in

that range. In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, and it perceives a sound within that range as more intense than a sound of higher or lower frequency with the same magnitude. To approximate the frequency response of the human ear, a series of sound level adjustments is usually applied to the sound measured by a sound level meter.

The A-scale weighting network approximates the frequency response of the average healthy ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Noise levels for traffic noise reports are typically reported in terms of A- weighted decibels [dB(A)]. All sound levels discussed in the PEIR analysis (Chapters 6.0 and 7.0) are A-weighted. Examples of typical noise levels for common indoor and outdoor activities are depicted in Table 2-6.

Under controlled conditions in an acoustics laboratory, the trained, healthy human ear is able to discern changes in sound levels of 1.5 dB(A) under certain conditions. Outside such controlled conditions, the average healthy ear can barely perceive changes of 3 dB(A), a change of 5 dB(A) is readily perceptible; and an increase (decrease) of 10 dB(A) sounds twice (half) as loud.

Table 2-6
Typical Sound Levels in the Environment and Industry

Common Outdoor Activities	Noise Level [dB(A)]	Common Indoor Activities
—	110	Rock band
Jet fly over at 300 m (1000 feet)	100	—
Gas lawn mower at 1 m (3 feet)	90	—
Diesel truck at 15 m (50 feet), at 80 km/hr (50 mph)	80	Food blender at 1 m (3 feet) Garbage disposal at 1 m (3 feet)
Noisy urban area, daytime Gas lawn mower at 30 m (100 feet)	70	Vacuum cleaner at 3 m (10 feet)
Commercial area Heavy traffic at 90 m (300 feet)	60	Normal speech at 1 m (3 feet)
Quiet urban daytime	50	Large business office Dishwasher next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural nighttime	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearting	0	Lowest threshold of human hearting

SOURCE: Caltrans 2013a

d. Noise Descriptors

The two noise metrics used in the analysis (Chapters 6.0 and 7.0) are the equivalent noise level (Leq) and the CNEL.

Equivalent Noise level (Leq)

The equivalent sound level (Leq) is also referred to as the time-average sound level. It is the equivalent steady state sound level, which in a stated period of time would contain the same acoustical energy as the time-varying sound level during the same time period. The period of time averaging may be specified; Leq(3) would be a three-hour average. When no period of time is specified, a one-hour average is assumed. The one-hour A-weighted equivalent sound level is the energy average of the A-weighted sound levels occurring during a one-hour period. It is important to understand that noise of short duration, that is, times substantially less than the averaging period, is averaged into ambient noise during the period of interest. Thus, a loud noise lasting many seconds or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period.

Community Noise Equivalent Level (CNEL)

People are generally more sensitive and annoyed by noise occurring during the evening and nighttime hours. Thus, the CNEL was introduced. The CNEL scale represents a time-weighted 24-hour average noise level based on the A-weighted sound level. CNEL accounts for the increased noise sensitivity during the evening (7:00 P.M. to 10:00 P.M.) and nighttime hours (10:00 P.M.. to 7:00 A.M.) by adding five and ten decibels, respectively, to the average sound levels occurring during these hours.

2.3.6.3 Vibration

Groundborne vibration consists of oscillatory waves that propagate from the source through the ground to adjacent structures. The frequency of a vibrating object describes how rapidly it is oscillating. The number of cycles per second of oscillation is the vibration frequency, which is described in terms of hertz. The normal frequency range of most groundborne vibration that can be felt generally ranges from a low frequency of less than 1 Hz to a high of about 200 Hz.

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings caused by construction activities may be perceived as motion of building surfaces or rattling of windows, items on shelves, and pictures hanging on walls. Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations reduce much more rapidly than low frequencies, so that low frequencies tend to dominate the spectrum at large distances from the source. When vibration encounters a building the overall vibration level is typically reduced; however, under certain circumstances, vibration can be amplified due to structural resonances of the floors and walls.

Vibration levels are usually expressed as single-number measure of vibration magnitude, in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second. Since it is related to the stresses that

are experienced by buildings, PPV is often used in monitoring of blasting vibration. Although PPV is appropriate for evaluating the potential of building damage, it is not suitable for evaluating human response since it takes some time for the human body to respond to vibrations.

2.3.7 Historical Resources

Since historical resources do not follow the bounds of the individual planning areas, the discussion here applies to both the North Park and Golden Hill CPU areas and their surroundings.

The prehistoric cultural sequence for what is now San Diego County is generally thought of as three basic periods: Paleoindian, locally characterized by the San Dieguito complex; Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay (AECOM 2015).

By the time Spanish colonists began to settle in Alta California in 1769, the areas that are now the North Park and Golden Hill communities were within the territory of the Kumeyaay people, a group of exogamous, nontotemic territorial bands with patrilineal descent. The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. For people in the areas that are now North Park and Golden Hill communities, grass seeds were probably the primary food, supplemented by various other seeds such as sage (*Salvia* spp.), sagebrush (*Artemisia californica*), lamb's quarters (*Chenopodium album*), and pine nuts (*Pinus* sp.). Small game was a major source of protein, but deer were hunted as well. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used. Shellfish and other littoral resources were important to coastal people, too. Settlements were moved seasonally to areas where wild foods were in season. For example, inland bands might have moved into desert areas in the spring to gather agave (*Agave deserti*), then to higher-altitude areas in the fall to gather acorns. Coastal bands lived in more or less permanent villages focused on more seasonally stable inshore and littoral resources. However, they often traveled to the area that is now Torrey Pines and La Rumarosa (in northern Baja California) to harvest pine nuts, for example, and to Cuyamaca and Mount Laguna for acorns (AECOM 2015).

Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which is located approximately 0.5 mile from the North Park CPU area and three miles from the Golden Hill CPU area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Although the actual location of the village is unknown, it is reported that a site called *Cosoy/Kosaii/Kosa'aay* by the Native Americans was in the vicinity of Presidio Hill and Old Town. Additionally, two named Kumeyaay villages or *rancheria* may lie in the vicinity of the Golden Hill CPU area. The village, or *rancheria of Los Choyas*, was located near the mouth of Los Chollas Creek. The village of *Pu-Shuyi* was located near the foot of modern-day Market Street (AECOM 2015).

In the mid-19th century, San Diego had approximately 650 residents. However, new arrivals were transforming the small Mexican community into a growing commercial center. In 1867, Alonzo Erastus Horton acquired nearly 1,000 acres of land two miles south of "Old Town", where downtown

San Diego sits today. Dubbed "New San Diego", Horton orchestrated the creation of a new city center, relocating the city's first bank, main newspaper, and several government buildings to this site. Thus Old Town was supplanted as the city's primary commercial center. The arrival of the railroad in the 1880s linked San Diego with the eastern United States and sparked its first building boom. By 1887, San Diego's population had spiked to 40,000, and large tract of new development began to appear on the hills immediately adjacent to downtown.

By 1892, substantial infrastructure improvements were underway, including public utilities, street paving, sewer systems, and the electrification of the streetcar system. These improvements would be critical to the development of new suburbs surrounding downtown and the 1,400-acre City Park (Balboa Park), including present-day North Park and Golden Hill.

North Park initially developed as an agricultural community. By 1900, there were seven land owners and fifty-five residents between Florida Canyon and the eastern City limits at Boundary Street. However, by 1905 most of the groves had been decimated by drought. This, combined with ongoing infrastructure improvements, paved the way for the subdivision of these agricultural lands for residential development.

Golden Hill was settled in the late 19th century, and is largely significant with regard to its residential history. Initially marketed by real estate speculators as one of San Diego's finest districts, many of the city's most affluent citizens constructed their mansions atop the crest of Golden Hill near the turn of the 20th century.

As the streetcar lines were connecting North Park and Golden Hill to Downtown and one another, the city was making plans for the 1915 Panama-California Exposition in Balboa Park, which would serve as a national advertisement for the City of San Diego. In response, local developers began to subdivide new tracts of land, particularly in the areas immediately surrounding the park. In North Park, mostly middle-class families erected the modest residences that make up much of community's residential building stock today. During this period, architectural preferences shifted away from Victorian styles to the Craftsman style. During this same period, bungalow courts were proliferating throughout North Park, primarily in the area between University and Adams avenues. One of North Park's earliest commercial nodes, at the intersection of the 30th Street and University Avenue streetcar lines, would developed into the community's primary business district, second only to downtown San Diego. In Golden Hill, residential development accelerated, but shifted to the northeastern portion of the Planning Area adjacent to Balboa Park. Replete with single-family homes designed in an eclectic mix of architectural styles, the majority of Golden Hill was built to capacity by 1930.

In the years following the Great Depression, the North Park and Golden Hill communities experienced marked physical change. Residential construction essentially ceased, and many business ventures failed along established commercial thoroughfares. It was United States' entrance into World War II that effectively ended the economic downturn and boosted the regional economy. This was particularly true in San Diego; with its extensive military and manufacturing facilities now devoted to the defense industry, the city had received the highest per capita share of war contracts in the state. Like other large cities, San Diego's wartime and postwar population growth far outpaced its ability to provide sufficient services and housing. In response, city officials rezoned large sections of the planning areas to accommodate high-density residential development.

In Golden Hill, many of the neighborhood's large mansions were replaced with large multifamily complexes, while others were subdivided into multiple units. In North Park, unimproved lots in established neighborhoods were infilled with single-family homes and residential courts inspired by Federal Housing Administration (FHA) designs. Developers of multi-family housing favored higher densities over the residential courts of the pre-war period. The result was the proliferation of the two-story stucco box apartment building, designed to maximize the number of units and provide the required the parking on a single residential lot. Development from this era reflected Post-War American values and design trends, such as automobile oriented commercial development and Modern design in both residential and commercial buildings.

As the economy slowly began to rebound, new businesses occupied existing storefronts along established commercial corridors, often renovating their facades with more contemporary details. The modernization of storefronts occurred along Main Streets and commercial corridors throughout California, and included new large display windows which allowed merchandise to be visible to passing motorists. Such changes reflect the evolution of a thriving commercial core.

Today, the North Park and Golden Hill communities are best characterized in terms of their diversity. In addition to housing people from a wide variety of income levels and ethnic groups, the communities boast a built environment that is equally as eclectic, reflecting the rich history – both shared and unique – of some of San Diego's oldest neighborhoods.

Historical Themes in North Park and Golden Hill

Golden Hill

- The Early History of Greater Golden Hill: 1769-1885
- An Elite Residential District: 1885-1905
- Streetcar Development: 1905-1930
- An Era of Transitions: 1930-1990

North Park

- Early Settlement of Greater North Park: 1893-1906
- Development of North Park: 1907-1929
- Influence of The Great Depression & World War II in North Park: 1930-1945
- Post-World War II Development in North Park: 1946-1970

2.3.8 Biological Resources

The North Park and Golden Hill communities are urban communities in the City of San Diego and are essentially completely built out. Most of each of the CPU areas are developed and consist of ornamental and non-native vegetation within the urbanized portions. Native vegetation generally occurs within the canyons and areas designated as open space where development has not occurred.

2.3.8.1 Soils

The U.S. Department of Agriculture mapped the following soil series in the North Park and Golden Hill: Gaviota fine sandy loam, Huerhuero loam, Olivenhain cobbly loam, Riverwash, Redding-Urban Land complex, Redding cobbly loam, terrace escarpments, made land, and urban land. Most of the

North Park and Golden Hill is covered by urban lands; the canyons are mostly covered by Huerhuero loam.

2.3.8.2 Topography

The North Park and Golden Hill planning areas consist of the generally flat San Diego Mesa incised by steep-sided canyons draining into Mission Valley and/or the San Diego Bay basin. Current land use in the CPU areas consists of developed residential communities and commercial buildings on the mesa tops, and undeveloped areas generally located on natural canyon hillsides and in canyon bottoms. The gradient of natural canyon sloes is variable but are locally steeper that 2:1 (horizontal to vertical). Manufactured slopes are locally present and, where steeper than 1 ½:1 up to eight feet high or greater than eight feet high and steeper than 2:1, are considered existing non-confirming slopes.

2.3.8.3 Botanical Resources

A general description of vegetation communities and land cover types mapped within the three communities is described below. There are seven vegetation communities and land cover types present: coastal sage scrub, chaparral, grassland, riparian scrub, eucalyptus woodland, disturbed land, and urban/developed. Acreages of vegetation communities and land cover types mapped within each CPU area are described within the discussion of each respective CPU area (Chapters 6.8 and 7.8).

a. Wetland Vegetation Communities

Wetland vegetation communities are dominated by plant species adapted to soils that have periods of prolonged saturation. Wetland vegetation communities are considered sensitive and regulated by the U.S. Army Corps of Engineers (ACOE), U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and the City of San Diego. One wetland community, riparian scrub, occurs in the CPU areas.

Riparian scrub is considered a sensitive wetland habitat under Environmentally Sensitive Lands (ESL) and the City of San Diego's Biology Guidelines. This vegetation community may vary from open to dense and is typically dominated by broad-leafed, winter deciduous trees and/or shrubs. It may contain an understory consisting of sub-shrubs or herbaceous species, although denser stands may prevent the development of understory vegetation. Tree species may include willows (*Salix* spp.), Fremont cottonwoods (*Populus fremontii*), and/or western sycamores (*Platanus racemosa*). Scrubs are generally dominated by riparian shrubs such as mule fat (*Baccharis salicifolia*). Riparian scrub is typically found along major drainages, but also may occur in smaller drainages.

b. Upland Communities

Upland vegetation communities do not support wetland species. These native vegetation types occur on the drier areas of the mesa, slopes, and canyons in the CPU areas. There are three vegetation communities and three land cover types in this category as described below.

Grassland

Grassland is characterized by a dense to sparse cover of native and non-native annual grasses, which may include numerous native wildflowers, particularly in years of high rainfall. Grasslands contain species including, but not limited to, needle grasses, bromes, wild oats, ryegrasses, and fescues. Typically, this community includes at least 50 percent cover of the entire herbaceous layer attributable to annual non-native grass species, although other native and non-native plant species may be intermixed.

These annual plants germinate with the onset of the rainy season and set seeds in the late winter or spring. Grassland is typically found on fine-textured, usually clay, soils that range from being moist or waterlogged in the winter to being very dry during the summer and fall. This community is found in valleys and foothills throughout much of California at elevations below 3,000 to 4,000 feet.

Coastal Sage Scrub

Coastal sage scrub is a plant community comprised of low-growing, aromatic, drought- deciduous, soft-woody shrubs that have an average height of approximately three to four feet. The plant community is typically dominated by facultatively drought-deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat, and coyote bush (*Baccharis pilularis*) with non-native herbs and grasses growing between and within the shrubs. The vegetation community typically is found on low moisture-availability sites with steep, xeric slopes or clay rich soils that are slow to release stored water. These sites often include drier south- and west-facing slopes and occasionally north-facing slopes, where the coastal sage scrub can act as a successional phase of chaparral development.

Chaparral

Chaparral is a plant community typically dominated by broad-leaved sclerophyllous shrubs or small trees that typically range in height range from four to ten feet tall. Chaparral is typically dominated by blue-colored lilacs including Ramona lilac (*Ceanothus tomentosus* var. *olivaceus*), chaparral whitethorn (*C. leucodermis*), and hairy ceanothus (*C. oliganthus*) and may include manzanita (*Arctostaphylos* spp.), toyon (*Heteromeles arbutifolia*), sugar bush (*Rhus ovata*), and mission manzanita (*Xylococcus bicolor*). Chaparral typically is found in coastal foothills of San Diego County at elevations below 3,000 feet. It usually occupies canyon slopes or ravines where mesic conditions are present. The vegetation is usually dense, with little or no understory cover, but may include patches of bare soil. Many species in this community are adapted to repeated fires by their ability to stump sprout.

c. Other Land Cover Types

Three other land cover types are present within the North Park and Golden Hill CPU areas. All result from some sort of development, encroachment, or other human disturbance.

Urban/Developed

Areas mapped as urban/developed include locations with residential housing, commercial, and industrial land uses. Additionally, urban/developed includes ornamental areas that have been

landscaped with non-native species and are actively maintained. This land cover type is found over the majority of the North Park and Golden Hill CPU areas.

Disturbed Land

Disturbed land includes undeveloped areas where vegetation has been removed and supports primarily non-native plant species. These lands may have also been modified by activities such as off-road vehicle use. Disturbed land is typically located along the interface between the urban habitat areas and undeveloped canyons within the communities.

Eucalyptus Woodland

Eucalyptus woodland is comprised of stands of eucalyptus trees (*Eucalyptus* spp.). These trees are not native to the area and are considered invasive species because of their rapid growth rate, broad cover, and allelopathic chemicals contained in their leaf litter that prevents understory species from growing. Once established, eucalyptus groves often form dense canopies that displace native habitats over time.

2.3.8.4 Sensitive Biological Resources

Biological resources are considered sensitive if they are: (1) covered species or narrow endemic species under the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan and Biology Guidelines, (2) listed by state or federal agencies as threatened or endangered or are proposed for listing; (3) on California Rare Plant Rank 1B (considered endangered throughout its range) or California Rare Plant Rank 2 (considered endangered in California but more common elsewhere) of the California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California (2012); or (4) considered rare, endangered, or threatened by the California Natural Diversity Data Base (State of California [CNDDB] 2014) or local conservation organizations or specialists. Noteworthy plant species are considered to be those that are on California Rare Plant Rank 3 (more information about the plant's distribution and rarity needed) and California Rare Plant Rank 4 (plants of limited distribution) of the CNPS Inventory. Sensitive vegetation communities are those identified by the CNDDB, the Jepson Online Interchange, or identified by the City of San Diego (2012). Assessments for the potential occurrence of sensitive species are based upon review of species occurrence records from the CNDDB, known ranges, and habitat preferences for the species relative to habitat types present in each CPU area.

a. Sensitive Vegetation Communities

Sensitive vegetation communities are those communities that are of highly limited distribution. These communities may also support concentrations of sensitive plant or wildlife species. Within the City of San Diego's Biology Guidelines, upland vegetation communities have been divided into four tiers of sensitivity. Upland vegetation communities that are classified as Tier I (rare uplands), Tier II (uncommon uplands), or Tier III (common uplands) are considered sensitive by the City. Tier IV (other uplands) vegetation communities are not considered sensitive. The sensitive vegetation community Tiers present in the North Park and Golden Hill CPU areas are shown in Figures 2-5 and 2-6 and summarized below.

Coastal sage scrub, in pristine or disturbed condition, is considered sensitive by federal and state resource agencies due to the scarcity of this vegetation community and the number of sensitive species associated with it. This vegetation community is categorized as a Tier II vegetation community and is mapped within the North Park and Golden Hill CPU areas.

Chaparral is categorized as a Tier IIIA vegetation community. Tier IIIA communities, although common, are considered sensitive as they may support a variety of rare plant and animal species. Chaparral is also mapped within both CPU areas.

Grassland is classified as a Tier IIIB community. Tier IIIB habitat is considered less valuable than native habitat, but still provides foraging habitat for many species, particularly raptors, and may support a variety of rare plant and animal species. Grassland is found within the North Park CPU areas.

b. Sensitive Plant Species

The sensitive plant species below are known to occur within the two CPU areas based on information obtained from CNDDB. Precise locations of sensitive plant species is not available at the program-level analysis conducted for this PEIR and would be identified through on-site reconnaissance and project-level analysis in conjunction with any proposed future development projects. Tables 2-7 and 2-8 list the sensitive plant species with known occurrences in each CPU area. General descriptions of these sensitive plant species and which CPU area they are known to occur are described below.

c. Listed and MSCP-Covered Plant Species

The sensitive plant species discussed below have known historical occurrences within the North Park and Golden Hill CPU areas based on information obtained from CNDDB. Precise locations of sensitive plant species are not available at the plan-level analysis conducted for this PEIR and would be identified through on-site reconnaissance in conjunction with future projects with the potential to impact sensitive biological resources. The distribution of suitable habitat within the North Park and Golden Hill CPU areas was used to determine the potential for occurrence of sensitive plant species for the plan level of analysis. Potential areas of effect to sensitive plant species were identified in remnant native habitat existing at the interface of development and the adjacent urban canyons.

Image source: SanGIS (flown May 2012)

North Park
Community Plan Boundary

★ Sensitive Species (Source: CNDDB)

Sensitive Vegetation Communities

Tier II

Tier IIIA

Tier IIIB

Tier IV

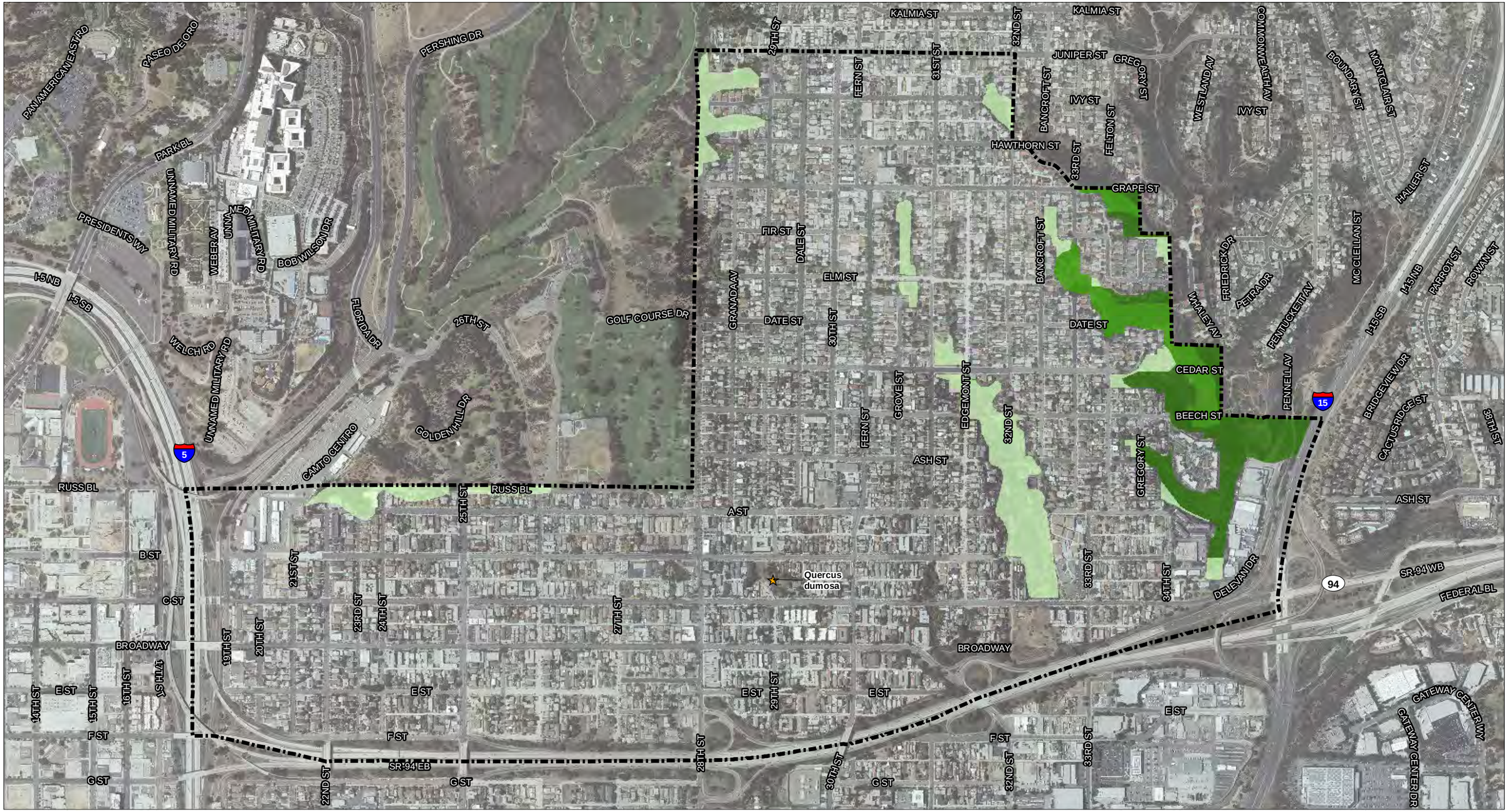
0 Feet 1,400

FIGURE 2-5

Sensitive Biological Resources – North Park

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Image source: SanGIS (flown May 2012)



Golden Hill Community Plan Boundary

★ Sensitive Species (Source: CNDDB)

Sensitive Vegetation Communities

- Tier II
- Tier IIIA
- Tier IV

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FIGURE 2-6

Sensitive Biological Resources – Golden Hill

Native habitat also exists within the canyons. The remaining CPU areas are built out and do not support sensitive biological resources.

The Geographic Information System (GIS) analysis showed that only very small areas (less than 0.1 acre per lot) of native habitat may remain on individual lots adjacent to canyon edges that may be impacted by edge effects (e.g., brush management zone 1). Therefore, it was determined that sensitive plant species have a low potential to occur within these areas. The GIS analysis also showed that sensitive plant species have the potential to occur further downslope within the relatively undisturbed native habitats. However, these areas are located where development is not expected to occur. Sensitive plant species could potentially occur within relatively undisturbed native habitats in the canyon areas of the CPUs. However, the project involve little or no change to the open space or Multi Habitat Planning Area (MHPA) designations in the urban canyons. Potentially occurring sensitive species would be conserved in accordance with ESL regulations, the Biology Guidelines, and the provisions of the MSCP Subarea Plan.

Table 2-7
Sensitive Plant Species Known or with the Potential to Occur – North Park

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period
ANGIOSPERMS: DICOTS				
Asteraceae	Sunflower Family			
Ambrosia monogyra [=Hymenoclea monogyra] singlewhorl burrobrush	–/–	2B.2	–	Perennial shrub; sandy, chaparral, Sonoran desert scrub; blooms Aug–Nov; elevation 30–1,650 feet.
Ericameria palmeri var. *palmeri* [=*E. palmeri* ssp. palmeri] Palmer's goldenbush [=Palmer's ericameria]	–/–	1B.1	MSCP	Perennial evergreen shrub; chaparral coastal sage scrub, typically in mesic areas; blooms July–Nov.; elevation less than 2,000 feet. Known from six occurrences in California.
Isocoma menziesii var. *decumbens* decumbent goldenbush	–/–	1B.2	–	Perennial shrub; chaparral, coastal sage scrub, sandy soils, often in disturbed areas; blooms April–Nov.; elevation less than 500 feet.
Cactaceae	Cactus Family			
Cylindropuntia [=Opuntia] californica var. *californica*] snake cholla	–/–	1B.1	NE, MSCP	Succulent shrub; chaparral, coastal sage scrub; blooms April–May; elevation 100–500 feet.

Table 2-7
Sensitive Plant Species Known or with the Potential to Occur – North Park

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period
Fagaceae	Oak Family			
Quercus dumosa Nuttall's scrub oak	–/–	1B.1	–	Evergreen shrub; closed-cone coniferous forest, coastal chaparral, coastal sage scrub, sandy and clay loam soils; blooms Feb.–March; elevation less than 1,300 feet.
Rhamnaceae	Buckthorn Family			
Adolphia californica California adolphia	–/–	2B.1	–	Perennial deciduous shrub; Diegan coastal sage scrub and chaparral; clay soils; blooms Dec.–May; elevation 100–2,500 feet.

FEDERAL CANDIDATES AND LISTED PLANTS
FE = Federally listed endangered
FT = Federally listed threatened

STATE LISTED PLANTS
CE = State listed endangered

CITY OF SAN DIEGO
NE = Narrow endemic
MSCP = Multiple Species Conservation Program covered species

CALIFORNIA NATIVE PLANT SOCIETY RARE PLANT RANKINGS
1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
2 = Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.
3 = Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.
4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
.3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

Table 2-8
Sensitive Plant Species Known or with the Potential to Occur – Golden Hill

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period
ANGIOSPERMS: DICOTS				
Fagaceae	Oak Family			
Quercus dumosa Nuttall's scrub oak	–/–	1B.1	–	Evergreen shrub; closed-cone coniferous forest, coastal chaparral, coastal sage scrub, sandy and clay loam soils; blooms Feb.–March; elevation less than 1,300 feet.

FEDERAL CANDIDATES AND LISTED PLANTS
FE = Federally listed endangered
FT = Federally listed threatened

STATE LISTED PLANTS
CE = State listed endangered

CITY OF SAN DIEGO
NE = Narrow endemic
MSCP = Multiple Species Conservation Program covered species

CALIFORNIA NATIVE PLANT SOCIETY RARE PLANT RANKINGS
1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
2 = Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.
3 = Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.
4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
.3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

San Diego thornmint (*Acanthomintha ilicifolia*). San Diego thornmint is federally listed as threatened and State listed as endangered. It is considered a narrow endemic under the MSCP and has a CNPS Rare Plant Ranking of 1B.1 (rare, threatened, or endangered in California and elsewhere; seriously endangered in California). This annual herb in the mint family (Lamiaceae) flowers from April through June. It is known to occur at elevations between 30 and 3,200 feet in San Diego County and in northern Baja California. Preferred habitat is friable or cracked clay soil in grassy openings within chaparral and coastal scrub. There is a low potential for occurrence of this species within the North Park and Golden Hill communities affected by the project.

San Diego goldenstar (*Bloomeria* [=*Muilla*] *clevelandii*). San Diego goldenstar is a covered species under the MSCP and has a CNPS Rare Plant Ranking of 1B.1 (rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California). San Diego goldenstar is a bulbiferous herb of the Brodiaea family (Themidaceae). This species is found only in southwestern San Diego County and northern Baja California, where it occurs on clay soils in coastal sage scrub, chaparral, and grassland habitats. It is a perennial bulb threatened by loss, degradation, and conversion of habitat. There is a low potential for occurrence of this species within the North Park and Golden communities affected by the project.

Snake cholla (*Cylindropuntia* [=*Opuntia*] *californica* var. *californica*). Snake cholla is considered a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.1 (rare, threatened, or endangered in California and elsewhere; seriously endangered in California). It is a generally prostrate cactus (Cactaceae family) that may grow up to 9 feet and blooms with yellow or green- yellow flowers in April and May. This variety grows only in southern San Diego County and Baja California, with the northernmost known location in Florida Canyon in Balboa Park. Snake cholla occurs in coastal sage scrub and chaparral habitats between100 and 500 feet elevation, most often on dry hillsides. It is associated with Huerhuero loam, Gaviota fine sandy loam, and Redding cobbly loam soils. This variety can be distinguished from *C. californica* var. *parkeri* by its range, prostrate form, and shorter tubercle and longer central spine. This species has known occurrences within the North Park community. However, there is a low potential for occurrence of this species within any of the areas affected by the project.

Variegated dudleya (*Dudleya variegata*) Variegated dudleya is considered a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.2 (rare, threatened, or endangered in California and elsewhere; fairly endangered in California). This small succulent perennial in the stonecrop family (Crassulaceae) emerges from a corm in spring and produces yellow flowers in May and June. Its range extends from southwestern San Diego County to Baja California. It occurs in coastal sage scrub, grassland, and chaparral habitats below 500 feet. It usually grows in stony places lacking shrub cover, on isolated rocky substrate in grasslands, and on mima mounds near vernal pools. It often occurs on gravelly loam soils. This species can be distinguished from many- stemmed dudleya (*D. multicaulis*) by its spoon-shaped, rather than linear, leaves and from Blochman's dudleya (*D. blochmaniae* ssp. *blochmaniae*) by its yellow, rather than white flowers. There is a low potential for occurrence of this species within the North Park and Golden Hill communities affected by the project.

Palmer's goldenbush [=Palmer's ericameria] (*Ericameria palmeri* var. *palmeri* [=*E. palmeri* ssp. *palmeri*]). Palmer's goldenbush is a CNPS List 1B.1 species (rare, threatened, or endangered in California and elsewhere; seriously endangered in California) and is a MSCP-covered species. This shrub in the sunflower family (Asteraceae) may grow to 5 feet tall and flowers from September to November. Its range extends from San Diego County south into Baja California; the northernmost occurrence is reported from Carmel Valley with most reports from near Jamul and Jamacha. It prefers seasonally moist sites, such as coastal drainages or mesic chaparral, but may occur in coastal sage scrub. It is associated with sandy loam soils. This species has known occurrences within the North Park community. However, there is a low potential for occurrence of this species within the North Park and Golden Hills communities affected by the project.

San Diego barrel cactus (*Ferocactus viridescens*). San Diego barrel cactus is a covered species under the MSCP and has a CNPS Rare Plant Ranking of 2B.1 (rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California). This globular succulent in the cactus family (Cactaceae) grows to 1 foot tall and flowers in May and June. It is found only in coastal San Diego County and Baja California. Although found as far north as Oceanside coastally and Poway inland, the largest populations of coast barrel cactus occur in Otay Mesa and Otay Valley, Point Loma, and Marine Corps Air Station Miramar. This species occurs in sandy and rocky areas in coastal sage scrub and grassland habitats below 500 feet elevation. It is the only barrel cactus found in coastal areas. There is a low potential for occurrence of this species within the North Park and Golden Hill communities affected by the project.

d. Other Sensitive Plant Species

California adolphia (*Adolphia californica*). California adolphia has a CNPS Rare Plant Ranking of 2B.1 (rare, threatened, or endangered in California, but more common elsewhere; seriously endangered in California). This small shrub in the buckthorn family (Rhamnaceae) flowers from December to April and loses its leaves in late summer and fall. Its spiny stems are identifiable at close range year-round, however. This species generally occurs in Diegan coastal sage scrub, near the edge of chaparral, particularly in dry canyons or washes. It is associated with San Miguel and Friant soils. Its range is limited to San Diego County and northern Baja California at elevations below 1,000 feet. In San Diego County, it is found from the Carlsbad area south into the Proctor Valley and the Otay area. This species has known occurrences within the North Park community. However, there is a low potential for occurrence of this species within the North Park and Golden Hill communities affected by the project.

Decumbent goldenbush (*Isocoma menzezii* var. *decumbens*). Decumbent goldenbush has a CNPS Rare Plant Ranking of 1B.2 (rare, threatened, or endangered in California and elsewhere; fairly endangered in California). This shrub is a member of the Asteraceae family that blooms from April through November. It ranges from Orange County to Baja California, with known occurrences on San Clemente and Santa Catalina islands. Decumbent goldenbush occurs in chaparral and coastal scrub habitats, often preferring sandy substrate and disturbed areas at elevations from 30 to 400 feet above mean sea level. This species has known occurrences within the North Park community. However, there is a low potential for occurrence of this species within the North Park and Golden Hill communities affected by the project.

Nuttall's scrub oak (*Quercus dumosa*). Nuttall's scrub oak has a CNPS Rare Plant Ranking of 1B.1 (rare, threatened, or endangered in California and elsewhere; seriously endangered in California). This evergreen shrub in the oak family (Fagaceae) grows less than 10 feet tall and blooms from February to April. This species is found near the coast in Santa Barbara, Orange, and San Diego Counties; and in Baja California, at elevations below 1,300 feet. It grows in chaparral, coastal sage scrub, and closed-cone coniferous forest habitats, preferring coastal chaparral with a relatively open canopy in flat areas, but growing in dense stands on north-facing slopes. In San Diego County it is known to grow as far inland as Camp Elliot and Otay Mesa, being replaced by the similar scrub oak (*Q. berberidifolia*) in higher, drier locations. Nuttall's scrub oaks can be distinguished from the scrub oak, with which it may hybridize, by its acorn, which is less than 0.4 inch wide, moderately tuberculed, with a thin cup, and by its leaves, which tend to be smaller, spinier, and more undulated

and have densely matted gray hairs. This species has known occurrences within both the North Park and Golden Hill CPU areas. However, there is a low potential for occurrence of this species within the North Park and Golden Hill communities affected by the project.

Singlewhorl burrobrush (*Ambrosia monogyra* [=*Hymenoclea monogyra*]). Singlewhorl burrobrush is a CNPS List 2B.2 species. This shrub in the sunflower family (Asteraceae) has slender stems, narrow leaves, and large inflorescences that bloom from August to November. Singlewhorl burrobrush is found in the southwestern United States from California to Texas as well as within northern Mexico. This species occurs in washes and dry riverbeds. This species has known occurrences within the North Park community. However, there is a low potential for occurrence of this species within the North Park community affected by the project.

e. Sensitive Wildlife Species

The sensitive wildlife species discussed below are known to occur within the CPU areas based on information obtained from CNDDB. Precise locations of sensitive wildlife species are not available for this program-level analysis and would be identified through on-site reconnaissance in conjunction with future projects. There are no known sensitive wildlife species documented for the Golden Hill community area. Table 2-9 lists the sensitive wildlife with known occurrences in the North Park CPU area. These sensitive wildlife species are described below.

The GIS analysis showed that only very small areas (less than 0.1 acre per lot) of native habitat may remain on individual lots adjacent to canyon edges that may be impacted by edge effects (e.g., brush management zone 1). Therefore, it was determined that sensitive wildlife species have a low potential to occur within these areas. The GIS analysis also showed that sensitive wildlife species have the potential to occur further downslope within the relatively undisturbed native habitats. However, these areas are outside of any potential plan level impacts (i.e., development is not expected to occur); therefore, no significant impacts to sensitive wildlife species are anticipated to occur.

Sensitive wildlife species could potentially occur within relatively undisturbed native habitats in the canyon areas of the CPUs. However, the plan updates involve little or no change to the open space or MHPA designations in the urban canyons. Potentially occurring sensitive species would be conserved in accordance with ESL regulations, the Biology Guidelines, and the provisions of the MSCP Subarea Plan.

f. Sensitive Birds

Coastal California gnatcatcher (*Polioptila californica californica*). The coastal California gnatcatcher is Federally listed as threatened, a CDFW species of special concern, and an MSCP-covered species. The coastal California gnatcatcher is a nonmigratory, resident species found on the coastal slopes of southern California, ranging from Ventura County southward through Los Angeles, Orange, Riverside, and San Diego Counties into Baja California. Coastal California gnatcatchers typically occur in or near sage scrub habitat, although chaparral, grassland, and riparian woodland habitats are used where they occur adjacent to sage scrub. Breeding occurs from February through August, and nests are constructed most often in California sagebrush. The coastal California

gnatcatcher diet consists mainly of sessile small arthropods, such as leafhoppers, spiders, beetles, and true bugs. The primary cause of decline in the coastal California gnatcatcher is due to habitat loss and degradation. This species has known occurrences within the North Park community. However, there is a low potential for occurrence of this species within the North Park community affected by the project.

Coastal cactus wren (*Campylorhynchus brunneicapillus couesi*). The coastal cactus wren is a CDFW species of concern and an MSCP-covered species. This species ranges from southern Orange County through San Diego County into extreme northwestern Baja California. Year- round residents, coastal cactus wrens inhabit coastal lowlands containing thickets of cholla and prickly pear cactus in coastal sage and maritime succulent scrub. Coastal cactus wrens build their nests in the cactus and males often build secondary nests, used for roosting by adults and fledglings and nesting for subsequent broods. Nesting occurs from March through July; fledglings remain in the nest until September. Their diet consists mainly of grasshoppers, beetles, ants, wasps, butterflies, moths, spiders, and occasionally vegetation, reptiles, and amphibians. The primary cause for the decline of this species is degradation and loss of breeding habitat loss due to urbanization. The potential for occurrence of this species within the North Park and Golden Hill CPU areas affected is low, as suitable habitat in the form of cactus thickets is not likely present.

Table 2-9
Sensitive Wildlife Species Known to Occur in the North Park CPU Area

Species	Status	Habitat/Comments
BIRDS (Nomenclature from American Ornithologists' Union 2013 and Unitt 2004)		
SYLVIIDAE – Gnatcatchers		
Coastal California gnatcatcher *Polioptila californica californica*	FT, CSC, MSCP, *	Coastal sage scrub, maritime succulent scrub. Resident.

STATUS CODES

Listed/Proposed

FE = Listed as endangered by the federal government
FT = Listed as threatened by the federal government
SE = Listed as endangered by the State of California

Other

BCC = U.S. Fish and Wildlife Service Birds of Conservation Concern species
BEPA = Bald and Golden Eagle Protection Act
CFP = California fully protected species
CSC = California Department of Fish and Game species of special concern
MSCP = Multiple Species Conservation Program covered species
* = Taxa listed with an asterisk fall into one or more of the following categories:

- Taxa considered endangered or rare under Section 15380(d) of CEQA guidelines
- Taxa that are biologically rare, very restricted in distribution, or declining throughout their range
- Population(s) in California that may be peripheral to the major portion of a taxon's range, but which are threatened with extirpation within California
- Taxa closely associated with a habitat that is declining in California at an alarming rate (e.g., wetlands, riparian, old growth forests, desert aquatic systems, native grasslands)

g. Sensitive Mammals

Mexican long-tongued bat (*Choeronycteris mexicana*). The Mexican long-tongued bat is a CDFW species of special concern. This species' distribution extends from the southern United States, through Mexico and Central Mexico, to northern South America. It has been reported as recently as 1999 in a number of urban locations in San Diego County, including Mount Helix and the San Diego Zoo. In other states, it has been reported in desert and montane riparian habitats, succulent scrub, and pinyon-juniper woodlands, and it roosts in caves, mines, and buildings. This bat is a colonial breeder from May to August. Their diet consists mainly of moths but eats other insects such as flies and beetles. Threats to this species include recreational caving; natural or intentional mine closures, renewed mining, mine reclamation, and loss of food resources. Indirectly, development, prescribed fire, or grazing could potentially have negative impacts on food plants. The potential for occurrence of this species within the North Park and Golden Hill CPU areas is low due to the lack of suitable habitat such as caves and mines, which are not present in these CPU areas.

2.3.8.5 Jurisdictional Waters/Wetlands

Agencies with jurisdictional authority over wetlands and other jurisdictional water resources include U.S. Fish and Wildlife Service (USFWS), ACOE, California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and the City of San Diego. Wetland definitions applicable to each agency are described below. A general description of each agencies regulatory authority over jurisdictional waters is provided in Chapter 5, Regulatory Setting.

a. U.S. Army Corps of Engineers

As stated in the federal regulations for the Clean Water Act, wetlands are defined as:

> Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances, do support a prevalence of vegetation typically adapted for life in saturated soil conditions (EPA, 40 Code of Federal Regulations [CFR] 230.3 and CE, 33 CFR 328.3).

Wetlands are delineated using three parameters: hydrophytic vegetation, wetland hydrology, and hydric soils. According to ACOE, indicators for all three parameters must be present to qualify an area as a wetland.

In accordance with Section 404 of the Clean Water Act, ACOE regulates the discharge of dredged or fill material into waters of the U.S. The term "waters of the United States" is defined as:

- All waters currently used, or used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide;
- All interstate waters including interstate wetlands;
- All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or

> natural ponds; the use, degradation, or destruction of which could affect foreign commerce including any such waters: (1) which could be used by interstate or foreign travelers for recreational or other purposes; or (2) from which fish or shellfish are, or could be taken and sold in interstate or foreign commerce; or (3) which are used or could be used for industries in interstate commerce.;

- All other impoundments of waters otherwise as defined as waters of the United States under the definition;
- Tributaries of waters identified above;
- The territorial seas; and
- Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in the paragraphs above [33 CFR Part 328.3(a)].

ACOE also requires the delineation of non-wetland jurisdictional waters. These waters must have strong hydrology indicators such as the presence of seasonal flows and an ordinary high watermark. An ordinary high watermark is defined as:

> . . . that line on the shore established by the fluctuations of water and indicated by physical characteristics such as [a] clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas (33 CFR Part 328.3).

Areas delineated as non-wetland jurisdictional waters may lack wetland vegetation or hydric soil characteristics. Hydric soil indicators may be missing, because topographic position precludes ponding and subsequent development of hydric soils. Absence of wetland vegetation can result from frequent scouring due to rapid water flow. These types of jurisdictional waters are delineated by the lateral and upstream/downstream extent of the ordinary high watermark of the particular drainage or depression.

b. U.S. Fish and Wildlife Service

Under Sections 7 and 10 of the Endangered Species Act, USFWS has regulatory authority over federally listed endangered or threatened plant and animal species. Specifically, Section 7 requires agencies to ensure that their activities are not likely to jeopardize the continued existence of listed species or impact designated critical habitats through consultation with the Service. Under Section 7, the USFWS issues a Biological Opinion that serves as the incidental take permit (ITP) associated with a 404 permit authorized by the ACOE. Under Section 10(a)1(A), the USFWS requires the preparation of a habitat conservation plan which accompanies the ITP to ensure that the authorized take is adequately mitigated and minimized.

c. California Department of Fish and Wildlife

Under sections 1600–1607 of the Fish and Wildlife Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., riparian scrub) associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider.

d. RWQCB Jurisdiction

The San Diego Regional Water Quality Control Board (RWQCB) is a State agency responsible for protecting water quality in California's San Diego Region (Region 9). The jurisdiction of this agency includes all waters of the State and all waters of the United States as mandated by both the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act. State waters are "any surface water or groundwater, including saline waters, with the boundaries of the state" [Water Code Section 13050(e)].

e. City of San Diego

According to the City of San Diego's Municipal Code (City of San Diego 2012), wetlands are areas which are characterized by any of the following conditions: (1) all areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation; (2) areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation; and (3) areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previously existing wetlands.

2.3.8.6 Wildlife Movement Corridors

Habitat linkages and wildlife corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Habitat linkages and wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. Wildlife movement corridors are considered sensitive by the City of San Diego and resource and conservation agencies.

Within the North Park and Golden Hill CPU areas, several canyons occur. However, these canyons are isolated by development from and are not part of a major wildlife corridor system. Although not part of a significant regional corridor, the canyons provide for local wildlife movement, such as birds and small mammals and serve as a stepping-stone for wildlife species movement between other local canyon systems and into major off-site habitat areas.

2.3.9 Geology

The North Park and Golden Hill CPU area are underlain by four surficial soil deposits and three geologic formations. The surficial soils include artificial fill (unmapped), topsoil/colluvium, alluvium (unmapped), and very old terrace deposits (formerly Lindavista Formation). The geologic formations include San Diego Formation, Pomerado Conglomerate, and Mission Valley Formation. Geology specific to each planning area is described and illustrated in Chapters 6.9 and 7.9. A general discussion of the surficial soils and geologic formations is presented below.

2.3.9.1 Artificial Fill (Unmapped)

Artificial fill is likely present in many areas throughout the planning areas. The location, extent, and suitability of the fill would need to be determined during site-specific geotechnical investigations. Artificial fills in older neighborhoods could possibly contain soils environmentally impacted by burn dumps, cesspools, etc.

2.3.9.2 Topsoil And Colluvium (Unmapped)

Varying thickness of topsoil likely blankets the level portions of the planning areas. Colluvium is present on sloping and natural hillsides within the Community Plan areas. Topsoil and colluvium are generally soft, loose, and/or expansive.

2.3.9.3 Alluvium (QAL)

Alluvial soils are mapped in canyon bottoms. These soils consist of soft sandy to silty clay and interfingers or grades with topsoil and slopewash along the outer edges of canyons. Depth of alluvial materials is anticipated to range from approximately five feet in smaller drainages to in excess of 20 feet in major drainages.

2.3.9.4 Very Old Terrace Deposits (QVOP)

Pleistocene age very old terrace deposits (formerly Lindavista Formation) are present at the surface across most of the San Diego Mesa. The very old terrace deposits are described by Kennedy and Tan (2008) as poorly sorted, red brown, interfingered siltstone, sandstone, and conglomerate.

Reed (1991) describes a mudstone unit (proposed, therein, as the Normal Heights Mudstone member of the Lindavista formation) lying on top of the very old terrace deposits. The Normal Heights Mudstone typically ranges from a few feet thick to approximately ten feet thick, or greater, in localized areas. This mudstone unit displays a “wide variation in structural performance.” The mudstone is typically highly expansive. The approximate location of the Normal Heights Mudstone within the North Park CPU area is shown in Chapter 6.9. The Normal Heights Mudstone is absent from the Golden Hill CPU area.

2.3.9.5 San Diego Formation (TSD)

The Pliocene-age San Diego Formation is exposed on slopes along drainages within the Community Plan areas and underlies the very old terrace deposits within the communities. The San Diego Formation consists of dense, yellow-brown, fine- to medium-grained, poorly indurated micaceous sandstone. It is readily eroded and forms uniform slopes along the sides of narrow canyons in the study area. The San Diego Formation is typically massive, and is considered to be flat lying, and exhibits a favorable geologic structure for gross slope stability. Soils derived from this formation are low expansive and have relatively good shear strength characteristics and as such, can provide good capping materials for pads and higher strength soils for construction of fill slopes. Portions of the San Diego Formation are cohesionless and can erode readily where they are exposed on non-conforming slope faces.

2.3.9.6 Pomerado Conglomerate (TP)

Tertiary-age Pomerado Conglomerate is mapped on the north-facing slopes primarily in the northern portions of the North Park Community Plan area. The Pomerado Conglomerate is typically a cobble conglomerate embedded in a silty to clayey sand soil matrix. The Pomerado Conglomerate is favorable for overall slope stability.

2.3.9.7 Mission Valley Formation (TMV)

Tertiary-age Mission Valley Formation is exposed in the canyons and north-facing slopes in the northern portions of the North Park Community Plan area. The Mission Valley Formation is composed of light gray, friable, fine to medium grained sandstone with occasional cobble conglomerate tongues. The Mission Valley Formation is generally flat-lying or nearly horizontally bedded and is favorable for overall slope stability.

2.3.10 Paleontology

Paleontological resources, or fossils, are the remains and/or traces of prehistoric plant and animal life. Fossils provide direct evidence of ancient organisms and document the patterns of organic evolution and extinction that have characterized the history of life. Fossil remains, such as bones, teeth, shells, and wood, are found in the geologic deposits (formations) within which they were originally buried. Paleontological resources contain not only the actual fossil remains, but also the localities where those fossils are collected and the geologic formations containing the localities. Fossil remains are important, as they provide indicators of the earth's chronology and history. They represent a limited, nonrenewable, and sensitive scientific and educational resource.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation. To evaluate paleontological resources in the proposed CPU areas, the presence and distribution of geologic formations, and the respective potential for paleontological resources must be evaluated.

Geologic formations located within the North Park and Golden Hill CPU areas include San Diego Formation, Pomerado Conglomerate, and Mission Valley Formation, described in Section 2.3.9, Geology, above. Paleontological resource sensitivity of geologic formations is typically rated from high to zero. The sensitivity of the paleontological resource determines the significance of a paleontological impact. The specific criteria applied for each sensitivity category are summarized below.

- High Sensitivity - These formations contain a large number of known fossil localities. Generally, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.

- Moderate Sensitivity - These formations have a moderate number of known fossil localities. Generally, moderately sensitive formations produce invertebrate fossil remains in high abundance or vertebrate fossil remains in low abundance.

- Low and/or Unknown Sensitivity - These formations contain only a small number of known fossil localities and typically produce invertebrate fossil remains in low abundance. Unknown sensitivity is assigned to formations from which there are no known paleontological resources, but which have the potential for producing such remains based on their sedimentary origin.

- Very Low Sensitivity - Very low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged to be unlikely to produce any fossil remains.

Table 2-10
Paleontological Determination Matrix

Geological Deposit/Formation/Rock Unit	Potential Fossil Localities	Sensitivity Rating
Alluvium (Qsw, Qal, or Qls)	All communities where unit occurs	Low
Ardath Shale (Ta)	All communities where unit occurs	High
Bay Point/Marine Terrace (Qbp)[1]	All communities where unit occurs	High
Cabrillo Formation (Kcs)	All communities where unit occurs	Moderate
Delmar Formation (Td)	All communities where unit occurs	High
Friars Formation (Tf)	All communities where unit occurs	High
Granite/Plutonic (Kg)	All communities where unit occurs	Zero
Lindavista Formation (Qln, Qlb)[2]	Mira Mesa/Tierrasanta	High
	All other areas	Moderate
Lusardi Formation (Kl)	Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe	High
	All other areas	Moderate
Mission Valley Formation (Tmv)	All communities where unit occurs	High
Mt. Soledad Formation (Tmv)	Rose Canyon	High
	All other areas where unit occurs	Moderate
Otay Formation (To)	All communities where unit occurs	High
Point Loma Formation (Kp)	All communities where unit occurs	High
Pomerado Conglomerate (Tp)	Scripps Ranch/Tierrasanta	High
	All other areas	
River/Steam Terrace Deposits (Qt)	South Eastern/Chollas Valleys/ Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro	Moderate
	All other areas	Low
San Diego Formation (Qsd)	All communities where unit occurs	High
Santiago Peak Volcanics (Jsp) Metasedimentay	Black Mountain Ranch/La Jolla Valley, Fairbanks Ranch/Mira Mesa/ Peñasquitos	Moderate
Santiago Peak Volcanics (Jsp) Metavolcanic	All other areas	Zero
Scripps Formation (Tsd)	All communities where unit occurs	High
Stadium Conglomerate (Tst)	All communities where unit occurs	High
Sweetwater Formation	All communities where unit occurs	High
Torrey Sandstone (Tf)	Black Mountain Ranch/Carmel Valley	High
	All other areas	Low

Sensitivity Rating Grading Thresholds for Required Monitoring
High = >1,000 cubic yards and 10 feet+ deep
Moderate = >2,000 cubic yards and 10 feet+ deep
Zero-Low = Monitoring not required
Baypoint[1] – Broadly correlative with Qop 1-8 of Kennedy and Tan (2008) new mapping nomenclature.
Lindavista[2] – Broadly correlative with Qvop 1-13 of Kennedy and Tan (2008) new mapping nomenclature.
*Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps.
**Monitoring may be required for shallow grading (i.e., <10ft) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.
***Monitoring is not required when grading documented or undocumented artificial fill. Source: City of San Diego CEQA Significance Thresholds, 2011

2.3.11 Hydrology and Water Quality

2.3.11.1 Drainage

The North Park and Golden Hill communities are located on a mesa top incised with a complex network of canyons. Drainage occurs in two directions. The northern portion of the mesa drains through the canyons and storm drains to the San Diego River, located within Mission Valley to the north. The southern portion of the mesa drains via the canyon systems and storm drains to San Diego Bay (City of San Diego 2015).

2.3.11.2 Water Quality

The North Park and Golden Hill CPU areas are located within the San Diego Hydrologic Basin. The Water Quality Control Plan for the San Diego Basin (Basin Plan), prepared by the San Diego RWQCB (1994, with amendments effective on or before April 4, 2011), designates beneficial uses for water bodies in the San Diego region and established water quality objectives and implementation plans to protect those beneficial uses. The region is broken down into Hydrologic Units (HUs) that cover the entire watershed of one or more major streams, Hydrologic Areas (HAs) for the watersheds of major tributaries and/or major groundwater basins within an HU, and Hydrologic Subareas (HSAs) for major subdivisions of hydrologic areas including both water-bearing and non-water-bearing formations.

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange Counties. The basin is composed of 11 major HUs, 54 HAs, and 147 HSAs, extending from Laguna Beach southerly to the United States-Mexico border. Drainage from higher elevations in the east flows to the west, ultimately into the Pacific Ocean.

San Diego Bay and the San Diego River, as major receiving water bodies, are considered impaired for specific pollutants. These include benthic community effects, sediment toxicity, copper, mercury, polychlorinated biphenyls (PCBs), zinc, indicator bacteria, chlordane, lindane/ hexachlorocyclohexane (HCH), and polynuclear aromatic hydrocarbons (PAH) for San Diego Bay; Enterococcus, fecal coliform (lower 6 miles), low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids (TDS), and toxicity for San Diego River; and Enterococcus and total coliform for the Pacific Ocean shoreline and the San Diego River outlet (Project Clean Water 2015). With the majority of existing development constructed prior to the adoption of storm water regulations requiring water quality protection through the treatment of storm water runoff, existing best management practices (BMPs) for the protection of storm water runoff within the North Park and Golden Hill communities are limited, and therefore further contribute to the existing impairments for which a receiving water body is listed.

2.3.12 Public Infrastructure

The North Park and Golden Hill communities are served by a variety public facilities and services, including utilities such as water and sewer, storm water, and solid waste disposal. The infrastructure

needs for these services are managed through the City's Capital Improvements Projects (CIP) program. The City conducts a biannual review of public services, facilities, and utilities implementation in conjunction with the budget/CIP review cycle. As part of this review process, the City assesses the need for new or expanded services and public facilities in order to provide appropriate services and infrastructure commensurate with population increase.

2.3.12.1 Public Services and Facilities

Existing public services and facilities, including parks, recreation centers, libraries, schools, fire, emergency medical, and police, serve the residents and businesses within North Park, Golden Hill and surrounding communities. The following provides a discussion of the existing and planned public services and facilities that are, or will be, available to the CPU areas. The information provided below is based on communications with the service providers during preparation of this PEIR. The locations and capacity of the facilities are discussed in more detail in Sections 6.12 and 7.12.

a. Police Protection

Police services are provided by the San Diego Police Department. The Police Department does not staff individual stations based on population ratios. The goal Citywide is to maintain 1.45 officers per 1,000 population ratio, which the Police Department is currently meeting based on a 2010 census-estimated residential population of 1,376,173. The Police Department currently uses a five-level priority dispatch system, which includes, in descending order: Priority E (Emergency), One, Two, Three, and Four.

Police protection for the North Park community is provided by the Western Division and Mid City Divisions of the Police Department. Western Division is located at 5215 Gaines Street serves a population of 129,709 people and encompasses 22.7 square miles. Located at 4310 Landis Street, the Mid City Division serves a population of 173,012 people and encompasses 12.8 square miles. The Western Division serves the neighborhoods of Hillcrest, La Playa, Linda Vista, Loma Portal, Midtown, Midway District, Mission Hills, Mission Valley West, Morena, Ocean Beach, Old Town, Point Loma Heights, Roseville-Fleetridge, Sunset Cliffs, University Heights and Wooded Area. The Mid City Division serves the neighborhoods of Azalea/Hollywood Park, Burlingame, Castle, Cherokee Point, Chollas Creek, Colina del Sol, Corridor, Darnall, El Cerrito, Fairmont Village, Fox Canyon, Gateway, Islenair, Kensington, Normal Heights, North Park, Rolando, Swan Canyon, Talmadge, Teralta East, and Teralta West. Additional police support is provided by the Multi Cultural (City Heights East) Storefront, located at 5348 University Avenue.

Police protection for the Golden Hill community is provided by the Central Division of the Police Department. Located at 2501 Imperial Avenue, Central Division serves a population of 103,524 people and encompasses 9.7 square miles. The Central Division serves the neighborhoods of Balboa Park, Barrio Logan, Core-Columbia, Cortez, East Village, Gaslamp, Golden Hill, Grant Hill, Harborview, Horton Plaza, Little Italy, Logan Heights, Marina, Memorial, Banker's Hill/Park West, Petco, Sherman Heights, South Park and Stockton. Additional police support is provided by the Balboa Park Storefront, located at 1549 El Prado, and the Logan Heights Storefront, located at 446 26th Street.

b. Parks and Recreation

The City Parks and Recreation Department maintains nearly 40,000 acres of developed and undeveloped parkland categorized as population-based parks, resource-based parks, and open space. Resource-based parks are located at, or centered on, notable natural or man-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and are intended to serve the citywide population, as well as visitors. Population-based parks (commonly known as Neighborhood and Community Parks) are facilities and services located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community. Open space lands are City-owned lands located throughout the City, consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect native plants and animals, while providing public access and enjoyment by the use of hiking, biking, and equestrian trails.

c. Fire Protection

The North Park and Golden Hill CPU areas are located within the service area of the City of San Diego Fire-Rescue Department. The City Fire-Rescue Department serves a total area of approximately 331 square miles, a population of 1,337,000, and 17 miles of coastline extending three miles offshore. The City provides Fire services through geographic service areas. The Fire Department provides emergency/rescue services, hazard prevention and safety education to ensure the protection of life, property and the environment, including education about vegetation management to protect properties from wildfires in canyon areas. All fire department engines and trucks are full Advanced Life Support units and are equipped and capable of managing medical emergencies. Fire facilities serve multiple neighborhoods, and therefore need to be located on major roads accessible to neighborhoods, and adjacent to freeways when practicable.

The City does not have adequate fire station coverage to maintain desired service levels in some geographic areas and at all times due to a combination of funding, geographic and population growth factors. However, the City has recognized the value of fire prevention measures to reduce pressure on the overall response system in the long term; such measures include adopting stronger safety codes and an aggressive brush management program.

Emergency medical services are also provided to the North Park and Golden Hill communities and throughout the City through a public/private partnership between the City's Emergency Medical Services (EMS) and Rural Metro Corporation, which provides additional personnel and some ambulances. EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. Calls are prioritized from Level 1 (most serious) to Level 4 (non-emergency). Response time standards are provided in the General Plan Public Facilities, Services and Safety Element and summarized in Chapter 5, Regulatory Framework.

d. Libraries

Library services are provided by the San Diego Public Library (SDPL) and its branch locations. Per the City's *Guiding Principles for Library Facilities* (July 2001), the minimum branch library size should be 15,000 square feet. The Library System Improvements Program for the SDPL originally included a

new Central Library (completed in 2014) and 23 branch libraries. Nine libraries have been completed with either new construction or expansion. Three branches are in the SDPL five-year plan for either expansion or new construction: Mission Hills/Hillcrest, Skyline Hills, and San Ysidro. Others are in planning and design phases, on hold due to lack of funding, or the projects will be closed until funding is identified.

The North Park and Golden Hill communities are served by two branch locations of the San Diego Library system: the University Heights Branch Library and North Park Branch Library, both located in North Park. No branch libraries are located in the Golden Hill CPU area; the closest library to the South Park neighborhood of the Golden Hill CPU area is the North Park Branch, for the Golden Hill neighborhood it is the San Diego Central Library, located in the East Village neighborhood of Downtown San Diego.

e. Schools

The North Park and Golden Hill communities are located within the jurisdiction of the San Diego Unified School District (SDUSD). The North Park community is served by four elementary schools: Garfield, North Park, Jefferson, and McKinley Elementary Schools. North Park is also served by three private schools: Academy of Our Lady of Peace, St. Patrick's School, and St. Augustine High School. The Golden Hill community is served by McGill School of Success, Einstein Academy, and Golden Hill K-8.

In 2012, voters approved funding of two bond measures, Propositions S and Z, to fund repairs, and renovate and revitalize schools within the SDUSD. Bond projects build off improvements that were started with Prop MM funding and include classroom technology, safety and security upgrades, Americans with Disabilities Act (ADA) upgrades, new/ renovated facilities, temporary classrooms replaced by permanent classrooms, air conditioning, upgrades to ADA improvements to athletic facilities, turf fields, and other capital improvements at traditional and charter schools throughout the district.

All development projects within the City are required to pay school fees in accordance with the requirements of the SDUSD, and as mandated by state law, to accommodate the needs of public schools serving existing and future students.

g. Roadways

The City's Engineering and Capital Projects Department provides a full range of engineering services for the City's capital investment in various types of infrastructure, including roadways, and provides traffic engineering services to the communities. The department is responsible for the planning, design, project management, and construction management of public improvement projects, and also for providing traffic operations and transportation engineering services.

Operation and maintenance of roadways are managed by the Street Division of the City's Transportation and Storm Water Department. The Street Division is responsible for the maintenance of roadways, bridges, sidewalks, traffic control devices, street lighting, and urban forestry.

h. Water and Sewer Infrastructure

The Community Plan areas are located in the City of San Diego Public Utilities Department (PUD) service area. The PUD serves more than 1.3 million residents in the City and in certain surrounding areas, including both retail and wholesale customers. The PUD relies on imported water as its major water supply source, and is a member agency of the San Diego County Water Authority (Water Authority), which is in turn a member agency of the Metropolitan Water District of Southern California (MWD). The PUD currently purchases approximately 85 to 90 percent of its water from the Water Authority, which supplies the water (raw and treated) through two aqueducts consisting of five pipelines. In addition, the PUD uses three local supply sources to meet or offset potable demands: local surface water, conservation, and re-cycled water. The PUD water system extends over 404 square miles, including 324 square miles in the city, and includes potable and recycled water facilities.

Wastewater in the CPU areas is managed by the San Diego PUD Wastewater Branch, which operates the two components of the City's wastewater system: the Metropolitan Sewerage System and the Municipal Wastewater Collection System. The metropolitan system treats wastewater for a service area of 450 square-miles, stretching from Del Mar and Poway in the north, Alpine and Lakeside to the east, and south to the border of Mexico. The service area includes the City of San Diego and 15 other cities and districts. The system serves a population of about 2.2 million and treats an average of 180 million gallons of wastewater per day.

The Municipal Wastewater Collection System is responsible for the collection and conveyance of wastewater from residences and businesses in the City of San Diego, serving a 330 square-mile area with a population of 1.3 million people. The Municipal Wastewater Collection System consists of over 2,894 miles of sewer lines, nine major pump stations, and 75 smaller pump stations. Wastewater is conveyed via the pump stations to NCWRP, the Point Loma Wastewater Treatment Plant (PLWTP), and the SBWRP. Treated effluent is discharged to the Pacific Ocean through either the Point Loma Ocean Outfall or the South Bay Ocean Outfall.

2.3.12.2 Public Utilities

Public utilities include public water, energy, sewer, storm water, and solid waste collection and recycling that are available to serve the North Park and Golden Hill communities. A description of the existing conditions of each of these public utilities is provided below. Potential impacts to public utilities from implementation of the specific CPU are discussed in Chapters 6.13 and 7.13.

a. Water Supply

City of San Diego

The City of San Diego Public Utilities Department (PUD) provides water service to more than 1.3 million residents over 404 square miles of developed land in the south central portion of San Diego County, including the proposed CPU areas. In the past, the City relied on water from MWD for 95 percent of its supply. During years of drought this made the City extremely vulnerable to water supply shortages, such as in 1991 when a drought forced MWD to cut its deliveries to San Diego by

30 percent. As a result, San Diego County Water Authority (SDCWA) has implemented a strategy to aggressively diversify its water supply portfolio through the introduction of new local and imported water supplies, so that by 2014 MWD deliveries accounted for around 49 percent of the total supply with new sources and conservation efforts accounting for the remaining 51 percent.

SDCWA secured new imported water supplies through a long-term (45-75 year) water conservation and transfer agreement with the Imperial Irrigation District, which provided approximately 100,000 acre-feet of water from the Colorado River in 2014 and will double by 2021. SDCWA has a separate 110-year agreement to receive approximately 80,000 acre-feet of water from the Colorado River by lining parts of the Coachella and All-American canals.

SDCWA is also in the final stages of executing a $3.1 billion Capital Improvements Program that involves 50 different projects, including new reservoirs, pipelines, pumping stations, a new regional water treatment facility, and a project to raise the San Vicente Dam to allow for additional local storage. Other strategies involve collaboration with SDCWA's 24 local member retail agencies, and include: promoting water conservation through water use efficiency programs, and the introduction of supplies from groundwater, recycled water, and seawater desalination. Additional information about SDCWA water supply diversification projects is provided in SDWCA's 2010 Urban Water Management Plan (UWMP).

The City PUD receives the majority of its water supply from MWD through the Water Authority. Historic imported water deliveries from the Water Authority to the PUD and local surface water, conservation savings, and recycled water deliveries are shown in Table 6.13-1.

Table 2-11
Historic Imported, Local, and Recycled Water Demands to Public Utilities Department

Fiscal Year	Imported Water (acre-feet)	Local Surface Water (acre-feet)	Conservation[1] (acre-feet)	Recycled Water (acre-feet)	Total[2] (acre-feet)
1990	233,158	22,500	--	--	255,658
1995	162,404	59,204	8,914	--	230,342
2000	207,874	39,098	17,410	3,250	267,632
2005	204,144	26,584	29,410	4,294	264,432
2010	188,337	13,117	34,317	12,173	247,944

[1]Conserved water is from savings and is not a direct supply.
[2]Total includes water supplied and conserved.

The City water system consists primarily of nine surface water reservoirs with over 408,000 acre-feet of storage capacity, three water treatment plants, 31 treated water storage facilities, and more than 3,213 miles of transmission and distribution lines. The local surface raw water storage facilities are connected directly or indirectly to the City's water treatment operations: Otay Water Treatment Plant, Alvarado Water Treatment Plant, and Miramar Water Treatment Plant. These three plants have a total capacity of 294.4 million gallons per day.

The City's two recycled water facilities, North City Water Reclamation Plan (NCWRP) and South Bay Water Reclamation Plant (SBWRP), were built to treat wastewater to a level approved for landscaping

irrigation, manufacturing, and other specified non-potable uses. These recycled water facilities not only provide water to City residents and business, but also to other jurisdictions and water districts, including the City of Poway and the Olivenhain Municipal Water District. As part of the City's water resource strategy, the Water Purification Demonstration Project is examining the use of advanced water purification technology to provide additional water supply. The Demonstration Project will determine the feasibility of a full-scale reservoir augmentation project, which would diversify San Diego's water supply and reduce its dependence on imported water.

The PUD emphasizes the importance of water conservation to minimize water demand and avoid excessive water use. The PUD's Water Conservation Program, established in 1985, accounts for approximately 73,000 acre-feet of potable water savings per year. These savings have been achieved through creation of a water conservation ethic and implementation of programs, policies, and ordinances designed to promote water conservation practices, including irrigation management. In accordance with Municipal Code Section 147.04, all residential, commercial, and industrial buildings, prior to a change in ownership, are required to be certified as having water-conserving plumbing fixtures in place. The PUD also examines new water saving technologies and annually checks progress toward conservation goals, working collaboratively with the MWD and Water Authority to formulate new conservation initiatives.

The City developed a Long-Range Water Resources Plan (2002–2030) in order to address the projected need for additional water supplies. This Plan detailed existing water supplies, new water supply opportunities, objectives and performance measures, and ultimately conclusions and recommendations. The Plan is to be implemented in three phases in order to meet the City's growing demands and to make adjustments as necessary. The three phases are 2010, 2020, and 2030.

In May 2011, the City issued a draft 2010 UWMP that addresses the City's water system, water supply sources, historic and projected water use, and provides a comparison of water supply to water demands during average, single-dry, and multiple-dry year periods. The UWMP was prepared in accordance with the Urban Water Management Act (as amended, California Water Code, Sections 10610 through 10656), which requires every urban water supplier that provides water for municipal purposes to more than 3,000 connections or supplying more than 3,000 acre-feet of water annually, to adopt and submit a plan every five years to the California Department of Water Resources.

In accordance with the Conservation Element of the City's General Plan (Policy CE-A.11), development projects shall implement sustainable landscape design such as planting "deciduous shade trees, evergreen trees, and drought-tolerant native vegetation, as appropriate, to contribute to sustainable development goals" and using "recycled water to meet the needs of development projects to the maximum extent feasible" to aid in water conservation (City of San Diego 2008a).

The North Park and Golden Hill communities are served by existing six-inch- to 36-inch-diameter public water mains located in a grid pattern within the connecting streets. Water is distributed to businesses and residences through private water lines that connect to the public water main.

Metropolitan Water District of Southern California

The MWD was formed in 1928, to develop, store, and distribute supplemental water in southern California for domestic and municipal purposes. The MWD is a wholesale supplier of water to its member agencies, which includes the SDCWA. It obtains supplies from local sources as well as the Colorado River via the Colorado River Aqueduct which it owns and operates, and the Sacramento-San Joaquin Delta via the State Water Project. Planning documents such as the Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP) help to ensure the reliability of water supplies and the infrastructure necessary to provide water to southern California.

MWD's 2010 RUWMP documents the availability of these existing supplies and additional supplies necessary to meet future demands, includes the resource targets included in the IWRP, and contains a water supply reliability assessment that includes a detailed evaluation of the supplies necessary to meet demands over a 25-year period in average, single-dry year and multiple-dry year periods. MWD's recently adopted IWRP (2010) identifies a mix of resources (imported and local) that, when implemented, will provide 100 percent reliability for full- service demands. Services demands will be met through the attainment of regional targets set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking and water transfers, through year 2035.

San Diego County Water Authority

The Water Authority purchases water from the MWD that is delivered to the region through two aqueducts. Of the MWD's 26 cities and member agencies, the Water Authority is the largest member agency in terms of deliveries and purchases, with about 25 percent of all the water that MWD delivered in fiscal year 2007. As a retail member agency of the Water Authority, the PUD purchases water from the Water Authority for retail distribution within its service area. As discussed above, in 2014 MWD deliveries accounted for around 49 percent of the total supply with new sources and conservation efforts accounting for the remaining 51 percent.

The Water Authority's 2010 UWMP was adopted by the Water Authority Board on June 23, 2011, in accordance with state law and the RUWMP. The Plan contains a water supply reliability assessment that identified a diverse mix of imported and local supplies necessary to meet demands over the next 25 years in average, single-dry year, and multiple-dry year periods. The UWMP documents that no shortages are anticipated within its service area. The Water Authority also prepared an annual water supply report for use by its members that provides updated documentation on existing and projected water supplies.

PUD Water Supply Assessment and Verification

SB 221 and SB 610 went into effect January 2002, with the intention of linking water supply availability to land use planning by cities and counties. SB 610 requires water suppliers to prepare a Water Supply Assessment (WSA) report for inclusion by land use agencies during the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of large-scale subdivision of land under the State Subdivision Map Act. As defined in SB 221 and SB 610, large-scale projects include residential development projects of more than 500 residential units and/or

shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space.

The City's PUD prepared WSA reports for the project (May 2015), which are included as Appendix K to this PEIR. The WSA reports were prepared for the project to assess whether sufficient water supplies are, or will be, available to meet the projected water demands associated with the proposed land use scenarios. Because no subdivision of land is proposed as part of this project, the WSA reports were prepared in compliance with the requirements of SB 610. The WSA reports include, among other information, identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the project; and quantities of water received in prior years pursuant to those entitlement, rights, contracts, and agreements.

b. Water, Sewer, and Storm Water Infrastructure

Wastewater in the North Park and Golden Hill communities is managed by PUD Wastewater Branch, which operates the two components of the City's wastewater system: the Metropolitan Sewerage System and the Municipal Wastewater Collection System. The metropolitan system treats wastewater for a service area of 450 square-miles, stretching from Del Mar and Poway in the north, Alpine and Lakeside to the east, and south to the border of Mexico. The service area includes the City of San Diego and 15 other cities and districts. The system serves a population of about 2.2 million and treats an average of 180 million gallons of wastewater per day.

The Municipal Wastewater Collection System is responsible for the collection and conveyance of wastewater from residences and businesses in the City of San Diego, serving a 330 square-mile area with a population of 1.3 million people. The Municipal Wastewater Collection System consists of over 2,894 miles of sewer lines, nine major pump stations, and 75 smaller pump stations. Wastewater is conveyed via the pump stations to NCWRP, the Point Loma Wastewater Treatment Plant (PLWTP), and the SBWRP. Treated effluent is discharged to the Pacific Ocean through either the Point Loma Ocean Outfall or the South Bay Ocean Outfall.

The largest pump stations in the collection system are pump stations #1 and #2. Pump Station #1, located on East Harbor Drive, collects all of south San Diego's wastewater and has an average daily flow of 75 million gallons. It sends the wastewater flow north via the 8-mile South Metro Interceptor to Pump Station #2 which is located on North Harbor Drive. The average daily flow into Pump Station #2 is approximately 180 million gallons. This station pumps the wastewater to the PLWTP through two 87-inch force mains.

The PLWTP, located on the coast, processes approximately 175 million gallons a day of wastewater generated by 2.2 million residents and workers. The plant has a treatment capacity of 240 million gallons per day. The plant discharges to the Point Loma Ocean Outfall, a 4.5-mile long outfall that ends at a depth of 320 feet. The current modified NPDES permit for the PLWTP and outfall was renewed in 2010.

The PUD also operates the Metro Biosolids Center, a state-of-the-art regional biosolids treatment facility which turns waste into dewatered biosolids that are currently used as soil amendments, landfill, and landfill cover, but which also may be used to promote growth of agricultural crops. Skim

from the PLWTP is transported through the 17-mile Miramar Sludge Pipeline for treatment at the Biosolids Center along with solids from the NCWRP. Any remaining wastewater from the treatment process is returned to the PLWTP.

The San Diego PUD anticipates that planned improvements to the wastewater system will increase capacity to serve a population of 2.9 million, or 340 million gallons of wastewater per day, by the year 2050. Beginning in 2007, the City increased water and sewer rates to replace and improve both the water and sewer systems infrastructure. Some pipelines have been in operation for a hundred years and need to be replaced. The City of San Diego Water Department's Capital Improvement Program Guidelines and Standards provides the framework for the design and construction of new water facilities and address water efficiency, conservation, recycled and reclaimed water, cost effectiveness and timely construction.

The City also monitors and maintains the water and sewer system on an ongoing basis because of the age of the water and sewer infrastructure in the older communities. In a continuing replacement program, outmoded concrete sewer mains and cast iron water mains are being replaced on a citywide basis through the annual Capital Improvements Program. Replacement is currently scheduled based on breaks or blockages in the mains.

The Transportation and Storm Water Department (T&SW) is responsible for the operation and maintenance of streets, sidewalks, and storm drains; leads efforts to protect and improve the water quality of rivers, creeks, bays, and the ocean; performs traffic and transportation system engineering; manages the utilities undergrounding program and plans and coordinates work in the public right-of-way. Storm drains are designed to handle normal water flow, but occasionally during heavy rain, flooding will occur. Storm drain infrastructure within the community's streets often discharges into the natural canyon areas causing erosion. Storm water pollution affects people, as well as aquatic plant and animal life. Oil and grease from parking lots and roads, leaking petroleum storage tanks, pesticides, cleaning solvents, and other toxic chemicals can contaminate storm water and be transported into water bodies and receiving waters.

While storm drain infrastructure within public streets in the community still needs to be upgraded, new regulations require storm water flow to be controlled within individual sites. The City's Municipal Separate Storm Sewer System Permit (MS4 Permit), issued by the San Diego RWQCB, requires all development and redevelopment projects to implement storm water source control and site design practices to minimize the generation of pollutants. Additionally, the Permit requires new development and significant redevelopment projects that exceed certain size threshold to implement Structural Storm Water Best Management Practices (Structural BMPs) to reduce pollutant in storm water runoff and control runoff volume. There is also an increased reliance on Low Impact Development (LID) strategies to meet the MS4 Permit requirements and total maximum daily load as well. Examples of LID techniques are bioretention cells, green roofs, permeable pavement, infiltration basins and biofiltration planters.

c. Solid Waste

The City provides refuse, recycling, and yard waste collection and disposal services to some residents under the People's Ordinance (Municipal Code Section 66.0127), adopted in 1919. The free

solid waste collection services provided by the City are to primarily single-family homes, and some multi-family and commercial/business customers through General Fund monies. Most multi-family residences are not served and are required to fund and contract directly with private haulers for trash and recycling collection.

Solid waste generated in the North Park and Golden Hill communities is collected by private franchised haulers and taken to one of three active landfills permitted to accept solid waste: West Miramar Sanitary Landfill, Otay Landfill, and Sycamore Sanitary Landfill. The Miramar and Sycamore landfills are both located in the City, while Otay Landfill is located in the County of San Diego. Based on current and projected disposal rates, and permitted disposal limits, the San Diego region is anticipated to exceed the ability of existing landfills to accept waste within the next ten years unless landfill expansions are approved.

The Miramar Landfill is permitted to receive 8,000 tons per day, and on average, it receives less than 1,000,000 tons per year. The anticipated closure date for the landfill is 2022. The Sycamore Landfill is permitted to receive a maximum of 3,965 tons per day, although the permit and the facility franchise are inconsistent. The owner/operator is currently proposing a significant increase in throughput, together with a major expansion of the height and footprint of the facility. The Sycamore Landfill, based on a 3,965-ton- per-day limit, is expected to operate until 2031. In order to meet the region's long-term (year 2050) solid waste needs, the Sycamore Landfill expansion has been proposed. The Sycamore Landfill Master Plan proposes to increase the landfill capacity to 157 million cubic yards, which would allow an increase from 3,965 tons per day to approximately 11,450 tons per day. With the proposed expansion, the landfill would be operational until approximately 2050. This increase in landfill capacity is not currently approved or permitted, and therefore cannot be guaranteed to be completed at this time. The Otay Landfill is permitted to receive 5,830 tons per day. Permits were recently modified, which reduced the overall height of the landfill with no loss of capacity. The Otay Landfill is expected to serve the region through 2021.

In an effort to address landfill capacity and solid waste concerns, the California Legislature passed the Integrated Waste Management Act in 1989 (AB 939), which mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. In response, the City Environmental Services Department (ESD) developed the Source Reduction and Recycling program that outlines waste management policies and programs to meet the City's long-term disposal needs and achieve the mandated waste reduction. Since 2004, the City has diverted more than 50 percent of its generated waste stream from disposal. The City adopted the Recycling Ordinance in November 2007, and phased implementation of the ordinance over the next two years.

The State enacted AB 341 in 2011, which established a policy goal for California that no less than 75 percent of solid waste generated be source-reduced, recycled, or composted by 2020. Additionally, CalRecycle's Strategic Directive 6.1 (CalRecycle 2015) calls for a 50-percent reduction in organic waste disposed by 2020. Compliance with and implementation of the above State regulations and policy goals could potentially extend the life of existing landfills. On July 13, 2015, the City adopted a Zero Waste Plan, which would result in 70 percent waste diversion by 2020, 90 percent waste diversion by 2035 and 100 percent diversion by 2040.

A report was prepared by CalRecycle and issued in May 2012 detailing strategies to achieve AB 341 goal primarily through recycling. In July 2012, the City updated the Recycling Ordinance to lower the exemption threshold for required recycling, thereby requiring all privately serviced businesses, commercial/institutional facilities, apartments, and condominiums generating four or more cubic yards of trash per week to recycle.

Relative to development activities, pursuant to the City's Significance Determination Thresholds, any land development project that may generate approximately 60 tons of waste or more during construction and/or operation is required to prepare a project-specific Waste Management Plan to address disposal of waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals and must include: projected waste generation calculations and identification of the types of waste materials generated; description of how materials would be reused on- site; identification of source separation techniques for recycling; and identification of recycling and reuse facilities where waste would be taken if not reused on-site. The WMP reduces solid waste impacts to below a level of significance. In tandem with the WMP, all new development projects must comply with the City's Construction and Demolition Ordinance and Section 142.08 of the LDC, which outlines the requirements for refuse and recyclable materials storage.

d. Energy

Electricity

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the North Park and Golden Hill communities. SDG&E is regulated by the California Public Utilities Commission (CPUC). The CPUC sets the gas and electricity rates for SDG&E and is responsible for making sure that California utilities customers have safe and reliable utility service at reasonable rates, protecting utilities customers from fraud, and promoting the health of California's economy.

There are two major operating power plants in San Diego County: the Encina Power Plant and the San Onofre Nuclear Generating Station. However, it should be noted that the reactors at the San Onofre Nuclear Generating Station have been offline since January 2012. There are also a number of smaller generating plants in the county that are used as backup during times of peak power demand. These in- region assets are currently capable of generating approximately 2,360 megawatts (MW) of electricity, about 55 percent of the region's summer peak demand. However, San Diego's older in-region resources typically run at partial capacity (1,628 MW) due to air quality, high fuel cost, and other reasons. Power generation and power use are not linked geographically. Electricity generated is fed into the statewide grid and is generally available to any users statewide. SDG&E purchases electricity from this statewide grid through various long-term contracts.

Along with traditional utilities, private generating companies, and state agencies, the California Independent System Operator (ISO) is a component of the state's electricity industry. The ISO is a not-for-profit public benefit organization that operates the state's wholesale power grid. The California ISO strives to make sure California's electricity needs are met.

Natural Gas

Natural gas is imported into the San Diego region by pipeline after being produced at any of several major supply basins located from Texas to Alberta, Canada. Although the San Diego region has access to all of these basins by interstate pipeline, the final delivery into the SDG&E system is dependent on just one Southern California Gas Company (SoCalGas) pipeline which enters San Diego County from Orange County located along I-5.

Natural gas consumption by sector varies somewhat each year. In general, power plants account for the highest percentage of natural gas consumption in the San Diego region. Residential consumption of natural gas for heating and cooking is the second highest percentage, followed by cogeneration, commercial and industrial consumption, and natural gas fueled vehicles.

Solar Energy

In San Diego, solar energy can be used as an alternative to fossil-fuel energy via private on-site installation/generation or through earmarked purchase of green power from SDG&E. The California Energy Commission (CEC) mandated SDG&E to provide 20 percent of its total energy from solar or other renewable energy sources by the year 2010. While SDG&E missed this goal in 2010, the *Renewables Portfolio Standard Quarterly Report, 1st and 2nd Quarter 2012*, issued by CPUC, states that SDG&E, the region's primary energy provider, "served 20.8 percent of its 2011 retail sales with RPS-eligible renewable energy", thereby meeting the 2010 goal. SDG&E is on track to meet a 25 percent goal by 2016, as well as the long-term goal of 33 percent by 2020.

Currently, there are no mandated standards or ordinances requiring reliance on alternative energy by new developments. However, the City's Climate Action Plan (CAP) establishes a goal to achieve 100 percent renewable energy on the Citywide electrical grid by 2035. Additionally, Title 24 of the California Public Resources Code does contain mandated energy efficiency requirements for all new developments.

e. Communications

Communications systems for telephone, computers, and cable television are serviced by utility providers such as AT&T, Cox, Time Warner, and other independent cable companies. In addition, television services are available from the two satellite services, Direct TV and Dish. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed development projects. Individual development projects consisting of more than four lots are subject to San Diego Municipal Code Section 144.0240, which requires privately owned utility systems and service facilities to be placed underground.

2.3.13 Health and Safety

A hazardous material is any item or agent (biological, chemical, radiological, and/or physical), which has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. Hazardous materials are defined and regulated in the United States primarily by laws and regulations administered by the U.S. EPA, the U.S. OSHA, the U.S. DOT, and the U.S. NRC. Each agency has its own definition of a "hazardous material." Some common definitions are included below.

2.3.13.1 Hazardous Materials

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Title 22 of the California Code of Regulations, Division 4.5, Chapter 11, Article 3 groups hazardous materials into the following four categories based on their properties: toxic (causes human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), and reactive (causes explosions or generates toxic gases). Hazardous materials are commonly used in commercial, agricultural and industrial applications as well as in residential areas to a limited extent.

2.3.13.2 Hazardous Waste

A hazardous waste is any waste that may (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness, or (2) pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bio-accumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of, or otherwise managed (California Health and Safety Code, Section 25141). Hazardous materials and wastes can result in public health hazards if improperly handled, released into the soil or groundwater, or released into the air through vapors, fumes, or dust.

2.3.13.3 Hazardous Materials Sites

Hazardous materials are used for a variety of purposes including service industries, various small businesses, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Businesses that handle/generate hazardous materials within the City are monitored by the U.S. EPA. Small quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices.

2.3.13.4 Wildfire Hazards

Extended droughts characteristic of the City’s Mediterranean climate result in large areas of dry vegetation, particularly in late summer and fall, when Santa Ana winds blow in from the desert and dry out the vegetation. Potential wildfire risk zones within the Golden Hill CPU area are areas that

have steep slopes, limited precipitation, and plenty of available vegetation fuel. Both Golden Hill and North Park contain undeveloped land in the form of canyons that are occupied by a variety of native and non-native plant communities. Due to the amount of natural, unmaintained open space of both of these areas, there exists a high risk for wildfires.

Current City regulations require that brush management zones be established adjacent to development to reduce the risk from wildland fires. Pursuant to the LDC, a Brush Management Program is required for future development within the Golden Hill CPU area for parcels that abut the canyons and open space areas. The purpose of such a program is to reduce the risk of wildfire while minimizing visual, biological, and erosion impacts to natural areas. In all the areas requiring brush management, a combination of two brush management zones occurs. Zone 1 consists of paving or ornamental plantings, which would be located within the development pad of each residential lot. Zone 2 involves the selective thinning and pruning of native vegetation and is considered impact neutral.

2.3.13.5 Emergency Preparedness

The County of San Diego Office of Emergency Services (OES) coordinates the overall county response to disasters. OES is responsible for: notifying appropriate agencies when a disaster occurs; coordinating all responding agencies; ensuring that resources are available and mobilized; developing plans and procedures for response to and recovery from disasters; and developing and providing preparedness materials for the public.

OES staffs the Operational Area Emergency Operations Center, a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council (UDC), its governing body. The UDC, established through a joint powers agreement among all 18 incorporated cities and the County of San Diego, provides for coordination of plans and programs countywide to ensure protection of life and property.

In 2010, the County and 18 local jurisdictions, including the City of San Diego, adopted the Multi-Jurisdictional Hazard Mitigation Plan (MHMP). The MHMP is a countywide plan that identifies risks and ways to minimize damage by natural and manmade disasters. The plan is a comprehensive document that serves many purposes, including creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing interjurisdictional coordination.

The City of San Diego's disaster prevention and response activities are conducted in accordance with U.S. Department of Homeland Security Office of Domestic Preparedness requirements and incorporate the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's EOC, including being responsible for maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident.



Chapter 3
Project Description

3.1 Introduction

The project analyzed in this Draft Program Environmental Impact Report (PEIR) includes the North Park and Golden Hill Community Plan Updates (proposed CPUs), as well as several discretionary actions listed in Table 3-1, Project Components. The proposed CPUs and associated regulatory documents and actions form the "project" for this PEIR, and are referred to throughout the PEIR as the project. The project description contained within this section provides the basis for the environmental analysis in this PEIR for both proposed CPUs and the associated discretionary actions.

Table 3-1 Project Components
Certification of PEIR
Adoption of the Golden Hill Community Plan
Adoption of the North Park Community Plan
Adoption of the General Plan Amendments to Amend Community Plans
Adoption of the Golden Hill Impact Fee Study (Implementing Action)
Adoption of the North Park Impact Fee Study (Implementing Action)
Land Development Code Amendments including: • Repeal the Golden Hill Planned District Ordinance • Amend the Mid-City Communities Planned District to remove North Park from the Regulations • Adopt Zoning Amendments for Commercial and Residential Development Regulations • Adopt Zoning Amendments to the Historical Resources Regulations and amend the Neighborhood Development Permit regulations to address Potential Historic Districts
Rezone CPU area zoning with Citywide zones

The proposed CPUs and associated regulatory documents are available for review at the City and at the following websites:

North Park CPU:

https://www.sandiego.gov/planning/community/profiles/greaternorthpark

Golden Hill CPU:

https://www.sandiego.gov/planning/community/profiles/greatergoldenhill

The North Park and Golden Hills CPUs were updated concurrently in order to address key issues and propose solutions as they relate to attributes shared by each of the communities, including those relating to urban design, historic preservation, open space, and mobility. Background information regarding development of the proposed CPUs, including project changes and community outreach, is described in Chapter 4.0, History of Project Changes.

3.2 Relationship to the General Plan

The General Plan, adopted in 2008, did not change the community plan land use designations or zoning on individual properties, but rather provided policy direction for future community plan updates, discretionary project review, and implementation programs. The General Plan provides the Citywide vision and comprehensive policy framework for how the City should grow and develop, provide public facilities and services, and maintain the qualities that define the City as a whole.

The proposed CPUs would build upon the vision, goals, and strategies of the General Plan. The proposed CPUs are intended to further express General Plan policies through the provision of site-specific recommendations that implement Citywide goals and policies at the community plan level, address community needs, and guide zoning. The General Plan and Community Plans work together to establish the policy framework for growth and development in the CPU areas. The Land Development Code within the Municipal Code implements the community plan policies and recommendations through zoning and development regulations. Specific General Plan policies are referenced within the proposed CPUs to emphasize their relevance and applicability in the individual communities. This PEIR provides analysis and evaluation of all relevant land use and environmental issues associated with the project.

3.3 Project Objectives

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15124, the following objectives were identified to outline the underlying purpose for the project. These objectives will be used to assist the lead agency in developing a reasonable range of alternatives to be evaluated in this PEIR and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary. The primary objectives for the project are:

- Develop a multi-modal transportation network emphasizing active transportation measures for walkable and bicycle-friendly streets, and transit-related measures supporting transit operations and access.
- Maintain or increase the housing supply through the designation of higher residential densities focusing along major transit corridors.
- Provide for increased economic diversification through land use to increase employment and economic growth opportunities.
- Preserve the neighborhood character and design relationships between neighborhoods within each community through the development of transitions and design policies.
- Identify significant historic and cultural resources within each community and provide for their preservation, protection, and enhancement.
- Provide increased recreation opportunities and new public open spaces.
- Preserve, protect and enhance each community's natural landforms, including canyons and environmentally sensitive lands.
- Include financing strategies that can secure infrastructure improvements concurrent with development.

3.4 Project Description

The project includes comprehensive updates to the North Park and Golden Hill Community Plans, which are intended to guide development through 2035 and address changes in conditions since 1986 and 1988, respectively, when the North Park and Golden Hill Community Plans were adopted. The proposed CPUs provide detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, the prioritization and provision of public facilities, community and site-specific urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the North Park and the Golden Hill communities.

CPU implementation requires amendments to the General Plan to incorporate the updated community plans as components of the General Plan's Land Use Element; adoption of Land Development Code (LDC) amendments; rezoning from the existing Mid-City Planned District Ordinance and the Golden Hill Planned District Ordinance zoning to Citywide zones contained within the LDC; adoption of LDC amendments to allow for conformance with the community plan policies; and a comprehensive update to the existing Impact Fee Studies (formerly known as Public Facilities Financing Plans) resulting in a new Impact Fee Study for each community. Each of these project elements is discussed further below.

While the proposed CPUs set forth procedures for implementation, they do not establish regulations or legislation nor do they, on their own, rezone property. Controls on development and use of public and private property including zoning, development regulations, and implementation of transportation improvements are included as part of each community plan's implementation program that is described in Chapters 12 and 11 of the North Park and Golden Hill CPUs, respectively.

The proposed North Park and Golden Hill CPUs include an Introduction and Implementation chapter, and include the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Sustainability (called Sustainability and Conservation in the North Park CPU); Noise (Noise and Light in the North Park CPU); and Historic Preservation. Additionally, the proposed North Park CPU contains an Arts and Culture element. Each element of the proposed CPUs is described below.

3.4.1 Community Plan Elements

3.4.1.1 Land Use Element

The Land Use Element establishes the land use framework for each community and defines the distribution of proposed land uses on a map. The land use framework for the CPU areas is depicted on the proposed North Park and Golden Hill Community Plan land use maps (Figures 3-1 and 3-2). The maps designate the proposed general location, distribution, and extent of land uses. The land use classifications are meant to be broad enough to give the City flexibility in implementation, but clear enough to provide sufficient direction to carry out the goals of the proposed CPUs. The maps are to be used and interpreted only in conjunction with the text and other maps contained in the proposed CPUs.

The land use plans locate the highest intensity land uses within each community along transit corridors where existing and future commercial, residential and mixed-use development can support existing and planned transit investments. Residential density is proposed to be increased from the adopted plans in some areas and, within Golden Hill, reduced in some areas to help achieve these objectives.

Community plan land use designations that would be applied within the CPU areas are described below. Future development within each land use designation would be subject to the CPU policies applicable to each designation. Table 3-2 provides a summary of land use classifications within each CPU area and permitted densities/intensities.

a. Land Use Designations

Residential

Residential – Very High

Residential – Very High allows for multi-family housing in the highest density range (55 to 73~~75~~ dwelling units per acre [du/ac] and above).

Residential – High

Residential – High allows for multi-family housing within a high density range (45 to 5~~7~~4 du/ac).

Map Source: SanGIS

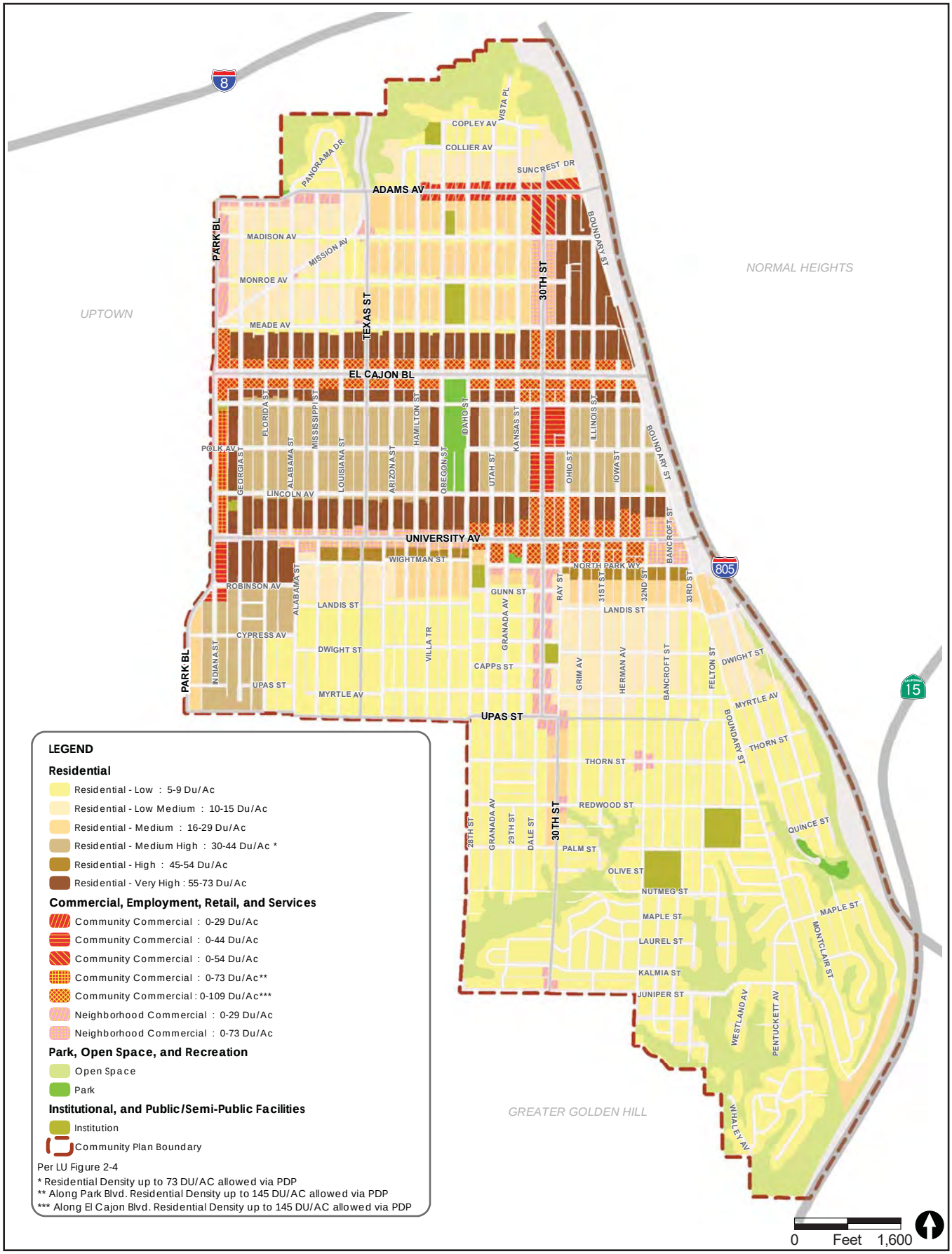


FIGURE 3-1

Community Plan Land Use – North Park

Map Source: SanGIS



FIGURE 3-2
Community Plan Land Use – Golden Hill

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Residential – Medium High

Residential – Medium–High allows for multi-family housing within a medium–high density range (30 to 44 du/ac).

Residential – Medium

Residential – Medium allows for both single-family and multi-family housing within a medium density range (16~~5~~ to 29 units du/ac).

Residential – Low Medium

Residential – Low–Medium provides for both single-family and multi-family housing within a low–medium density range (10 to 15~~4~~ du/ac).

Residential – Low

Residential - Low provides for both single-family and multi-family housing, with a low density range of 5 to 9 du/ac for North Park and a 1 – 9 du/ac range for Golden Hill. Single-family detached homes may be arranged with modest front, rear, and side yards.

Commercial and Employment

Neighborhood Commercial, Residential Permitted

Neighborhood Commercial – Residential Permitted focuses on commercial uses and provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 miles. Residential between 0–29 du/acre and 0–73 du/acre; office, public, and community gathering spaces are also allowed.

Community Commercial, Residential Permitted

Community Commercial – Residential Permitted focuses on commercial uses and provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Residential use between 0–29 du/acre, 0–44 du/acre, 0–54 du/acre, 0–73 du/acre, and 0–109 du/acre; office, public, and community gathering spaces are also allowed.

Institutional and Public/Semi-Public Facilities

Institutional

Institutional designation provides for uses that are identified as public or semi-public facilities in the proposed CPUs including but not limited to school, libraries, police and fire facilities, and cemeteries.

Park, Open Space, and Recreation

Open Space

Open Space applies to land or water areas generally free from development or developed with very low-intensity uses that respect natural environmental characteristics. Open Space lands are located throughout the City, consisting of canyons, mesas, and other natural land forms. This Open Space is intended to preserve and protect native plants and animals, while providing public access and enjoyment by the use of hiking, biking, and equestrian trails.

Population-Based Parks

Population-based parks provide for passive and/or active recreational uses, such as community parks, neighborhood parks, and recreation centers to meet the recreational needs of the community as defined by the future Recreation Element. Population-based parks (commonly known as Neighborhood and Community parks), facilities and services are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community. When possible, they adjoin schools in order to share facilities and are ideally within walking distance of the residences within their service area.

Table 3-2
Land Use Classifications and Permitted Densities/Intensities

Community Plan Land Use	Description	Residential Density (du/ac)[1]	Maximum Floor Area Ratio (FAR) (minimum where specified)[2]	Applicable Community Plan Area
Residential				
Residential – Very High	Provides for multi-family housing within a Very High density range. Limited commercial uses are also allowed by zones applied, but not required.	55–73	2.75 FAR	North Park
Residential – High	Provides for multi-family housing within a high density range. Commercial uses are also allowed, but not required.	45–54	2.25 FAR	North Park
Residential – Medium High	Provides for multi-family housing within a Medium-High density range. Commercial uses are also allowed, but not required.	30–44	1.50 to 1.80 FAR	North Park and Golden Hill
Residential – Medium	Provides for both single-family and multi-family housing within a medium density range.	16–29	0.9 to 1.35 (Golden Hill) l: 1.2 to 1.35 (North Park), as specified in Municipal Code	North Park and Golden Hill
Residential – Low Medium	Provides for both single-family and multi-family housing within a Low-Medium density range.	10–15	0.75 FAR, as specified in Municipal Code	North Park and Golden Hill

Table 3-2 Land Use Classifications and Permitted Densities/Intensities				
Community Plan Land Use	Description	Residential Density (du/ac)[1]	Maximum Floor Area Ratio (FAR) (minimum where specified)[2]	Applicable Community Plan Area
Residential – Low	Provides for both single-family and multi-family housing within a Low density range.	5–9 (1–9 Golden Hill)	Varies; see Table 131-04J in Municipal Code	North Park and Golden Hill
Commercial, Employment, and Industrial				
Neighborhood Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 miles. Housing is allowed as part of a mixed use project.	0–29	1.0 FAR (1.75 FAR Golden Hill Residential Mixed Use)	North Park and Golden Hill
Neighborhood Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 miles. Housing is allowed as part of a mixed-use project.	0–74	1.0 FAR with a 1.2 FAR bonus for Residential Mixed-Use Development	North Park
Community Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Housing is allowed as part of a mixed use project.	0–29	1.0 FAR (1.50 FAR Golden Hill Residential Mixed Use)	North Park
Community Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Housing is allowed as part of a mixed use project.	0–44	2.0 FAR with a 2.0 FAR bonus for Residential Mixed-Use Development and an additional 1.0 FAR for underground parking	North Park and Golden Hill
Community Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Housing is allowed as part of a mixed use project.	0–54	2.0 FAR with a 2.5 FAR bonus for Residential Mixed-Use Development and an additional 1.0 FAR for underground parking	North Park
Community Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Housing is allowed as part of a mixed use project.	0–73	2.0 FAR with a 2.5 FAR bonus for Residential Mixed-Use Development and an additional 1.0 FAR for underground parking	North Park
Community Commercial	Provides for shopping areas with retail, service, civic, and office uses for the community at large within 3 to 6 miles. Housing is allowed as part of a mixed use project.	0–109	2.0 FAR with a 3.0 FAR bonus for Residential Mixed-Use Development and an additional 1.0 FAR for underground parking	North Park

Table 3-2
Land Use Classifications and Permitted Densities/Intensities

Community Plan Land Use	Description	Residential Density (du/ac)[1]	Maximum Floor Area Ratio (FAR) (minimum where specified)[2]	Applicable Community Plan Area
Institutional and Public and Semi-Public Facilities				
Institutional	Provides a designation for uses that are identified as public or semi-public facilities in the Community Plan, including but not limited to schools, libraries, police and fire facilities, and cemeteries.	Not Applicable	Varies	North Park and Golden Hill
Park, Open Space, and Recreation				
Open Space	Applies to land or water areas generally free from development or developed with very low-intensity uses that respect natural environmental characteristics.	0–1	Not Applicable	North Park and Golden Hill
Population-based Parks	Provide for passive and/or active recreational uses, such as community parks and neighborhood parks.	Not Applicable	Not Applicable	North Park and Golden Hill

Notes:
[1] New residential development is required to be within the density range (both maximum and minimum) specified in the applicable designation as shown in Table 2-3 of the respective proposed CPUs. Residential density is applied to overall parcel area, excluding land that is not developable because of steep slopes or other natural constraints. Clustering is permitted in all residential designations to encourage open space conservation and preservation of natural topography; this may result in portions of a site developed at a density higher than the applicable density range, which is acceptable as long as the density for the overall development site is not exceeded.
[2] FAR represents total allowed FAR, as follows:
For Neighborhood Commercial and Community Commercial: FAR includes only non-residential uses. Zones applied allow additional FAR for residential mixed-use.
For Residential only uses: Projects would need to comply with both density and FAR standards.

b. Neighborhood Centers/Villages and Key Corridors

The proposed North Park and Golden Hill CPUs identify Neighborhood Centers/Villages and key corridor areas where growth is focused into mixed-use activity centers that are pedestrian friendly and linked to an improved regional transportation system. These areas would implement the General Plan's City of Villages Strategy and are envisioned to have an integrated mixture of uses, accessible and attractive streets, and public spaces. The proposed CPUs identify specific policies applicable to development in these areas. Refer to the proposed North Park CPU, Section 2.3, Village Districts and Key Corridors, and the Golden Hill CPU, Section 2.2, Land Use Framework, for the location and additional detail about the proposed community villages and corridors.

30th Street and University Avenue Community Village (North Park)

This Community Village is centered around the University Avenue and 30th Street intersection and includes most of the commercial properties along University Avenue between Idaho Street and Bancroft Street. It primarily includes a number of commercial and retail uses, multi-family housing within mixed-use developments, the historic North Park Theater, a designated mini-park, and a parking structure that serves the commercial district. It is considered the community's entertainment district with a range of quality shopping, and eating and drinking establishments.

30th Street and El Cajon Boulevard Community Village (North Park)

This Community Village is centered around the intersection between 30th Street and El Cajon Boulevard. Its key location, along El Cajon Boulevard commercial and transportation corridor, allows opportunities for mixed-use development with high residential densities that would be supported by transit and served by the surrounding commercial areas and services.

25th Street Neighborhood Village (Golden Hill)

This Neighborhood Village is identified with the 25th Street commercial corridor as its center. This portion of Golden Hill is pedestrian friendly and served by transit. The residential blocks surrounding 25th Street are already developed with transit-supportive residential densities. The commercial zone would allow for mixed-use development. A street reconfiguration project is underway within portions of 25th Street that would support an enhanced pedestrian and bicycling environment. Within the commercial core, design guidelines would encourage redevelopment of underutilized properties, such as existing auto-oriented commercial sites, with more attractive pedestrian-friendly mixed-use developments. Public space could be provided as pocket parks and plazas, particularly at corner locations.

c. Transit Corridors

Transit corridors between neighborhood commercial nodes also tend to be areas identified by the General Plan as having a relatively high village propensity due to the availability of transit service. While not physically identical to commercial nodes or neighborhood centers, these linear corridors provide similar commercial services and transit access for their adjacent residential neighborhoods and are intended to improve walkability and provide public space. Both the proposed North Park and Golden Hill CPU identify transit corridors in their respective Land Use Elements.

The proposed Golden Hill CPU identifies the 30th Street transit corridor as an area with village characteristics served by an existing transit line with additional planned service. The corridor contains a range of existing land uses and development forms, including commercial districts within South Park and single-family and multi-family development of various densities. The portion of the corridor south of B Street contains some of the community's highest residential densities as well as a few scattered stand-alone commercial uses, but lacks a commercial district and a true mixed-use focus. Development within the 30th Street transit corridor would be required to comply with applicable proposed Golden Hill CPU policies regarding provision of public spaces and infrastructure/mobility improvements.

The proposed North Park CPU identifies key corridors as El Cajon Boulevard, University Avenue, 30th Street, Adams Avenue, and Park Boulevard. Development within these corridors would be subject to the Corridor Policies LU-3.4 through LU-3.14 that address density in proximity to transit stops, building orientation, pedestrian mobility improvements, land use compatibility, and various location-specific land use policies.

d. Community Plan Enhancement Program (North Park)

Section 2.8 of the proposed North Park CPU establishes a Community Plan Enhancement Program that would allow development projects to request increased density in specific areas, shown on Figure 3-3. The intent of the program is to create more street and pedestrian-friendly projects that support transit. The program includes a Pedestrian-Oriented Infill Development Enhancement Program and a Transit-Oriented Development Enhancement Program, described below. Participation in these programs would require a Planned Development Permit (PDP), consistency with proposed North Park CPU Urban Design Element Policies as well as compliance with standards set forth in Section 143.0402 of the Land Development Code for PDPs and findings in LDC Section 126.0604(a).

The Transit-Oriented Development Enhancement Program would allow for increased residential density for projects located along the Bus Rapid Transit Corridor in areas designated 73 du/ac along Park Boulevard and 109 du/ac along El Cajon Boulevard (see Figure 3-3). Projects in these areas would be allowed to request increased density up to 145 du/acre.

The Pedestrian-Oriented Infill Development Enhancement Program would be available to applicants with existing development projects of 6 units or more in Multi-Family Residential areas designated as Medium–High up to 44 du/per acre within the area located between Lincoln Avenue and Howard Avenue (see Figure 3-3). Within these areas, applicable projects could request a density bonus of up to 73 du/acre.

The Community Plan Enhancement Program is separate from the State of California's Affordable Housing Density Bonus Regulations that is subject to the City's Affordable Housing Density Bonus Regulations in Land Development Code Chapter 14, Article 3, Division 7. The State Affordable Housing Density Bonus is available to eligible development Citywide. Applicants are eligible to apply for the State of California's Affordable Housing Density Bonus Program once the maximum allowable residential density per the plan is achieved; application for a Planned Development Permit is not required. The maximum allowable residential density per the Community Plan means the maximum allowable residential density for the designated zoning ranges without the additional density available through the Community Plan Enhancement Program. However, should an applicant apply for and obtain the increased density under the Community Plan Enhancement Program, an additional density bonus beyond what was authorized under the Community Plan Enhancement Program could still be authorized under the City's Affordable Housing Density Bonus Regulations.

Map Source: SanGIS

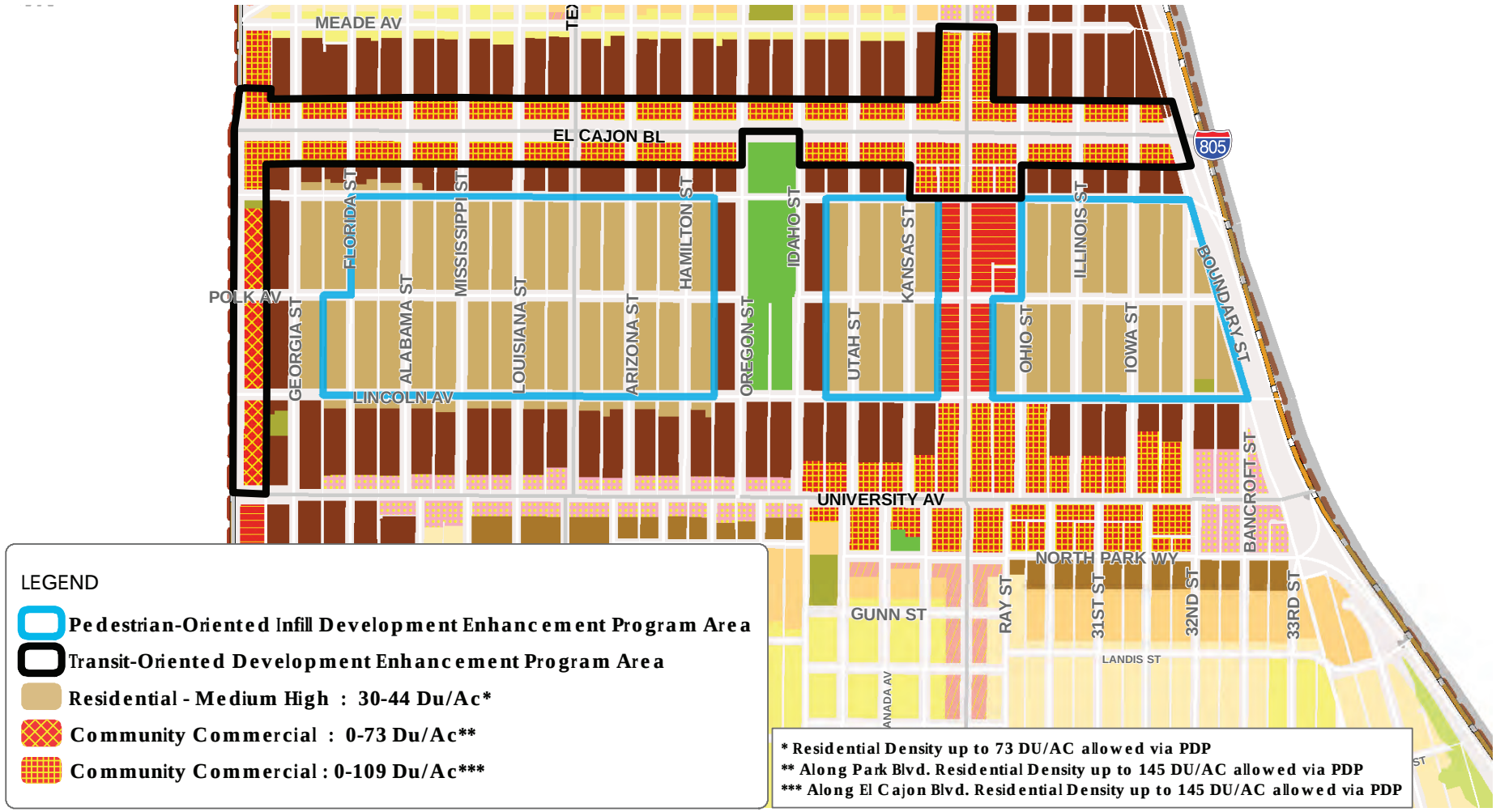


FIGURE 3-3

Community Enhancement Program Areas – North Park

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3.4.1.2 Mobility Element

The proposed North Park and Golden Hill Mobility Elements provide direction on how to achieve mobility goals through a balanced, multi-modal transportation network in the community plan areas. These elements are closely linked to the Land Use and Urban Design Elements. The mobility elements describe existing and future conditions related to streets, vehicles and parking, as well as bicycles, pedestrians, and public transit, including recommended mobility improvements to achieve adequate capacity and improved access. Future roadway classifications proposed for the North Park and Golden Hill CPU areas are shown in Figures 3-4 and 3-5, respectively.

The proposed CPUs identify specific policies applicable to pedestrians, bicycling, and transit and identify priority routes for each mode. Policies applicable to the street system are provided in addition to roadway classifications. Street system policies focus on providing a complete streets network throughout the communities to accommodate all modes.

The proposed North Park CPU includes policies related to Intelligent Transportation Systems (ITS), such as coordinated traffic signals and use of Transportation Demand Management to reduce single-occupancy vehicle trips. The proposed CPUs also include policies related to parking that address issues such as the design and placement of parking areas and compatibility with bicyclists and motorcycles. The proposed Mobility Element is contained within Chapter 3 of both the proposed North Park and Golden Hill CPUs.

3.4.1.3 Urban Design Element

The proposed North Park and Golden Hill Urban Design Elements describe existing community character and identity and provide goals and policies related to urban form, including public spaces and village design, neighborhood and community gateways and linkages, building types and massing, streetscape and pedestrian orientation, public views, urban forestry, and other unique aspects of the communities. These elements present the proposed urban form of the plan areas and highlight opportunities for urban design in the community. The proposed Urban Design Elements are contained within Chapter 4 of both the proposed North Park and Golden Hill CPUs.

3.4.1.4 Economic Prosperity Element

The proposed North Park and Golden Hill Economic Prosperity Elements link economic prosperity goals with land use distribution and employment land use policies, including specific policies aimed at supporting existing and new businesses to preserve and create job opportunities for residents, primarily through new commercial and office development where appropriate. These elements seek to enhance economic opportunity in the plan areas, building on significant growth opportunities along the area's main commercial corridors. The proposed Economic Prosperity Elements are contained within Chapter 5 of both the proposed North Park and Golden Hill CPUs.

Map Source: SanGIS

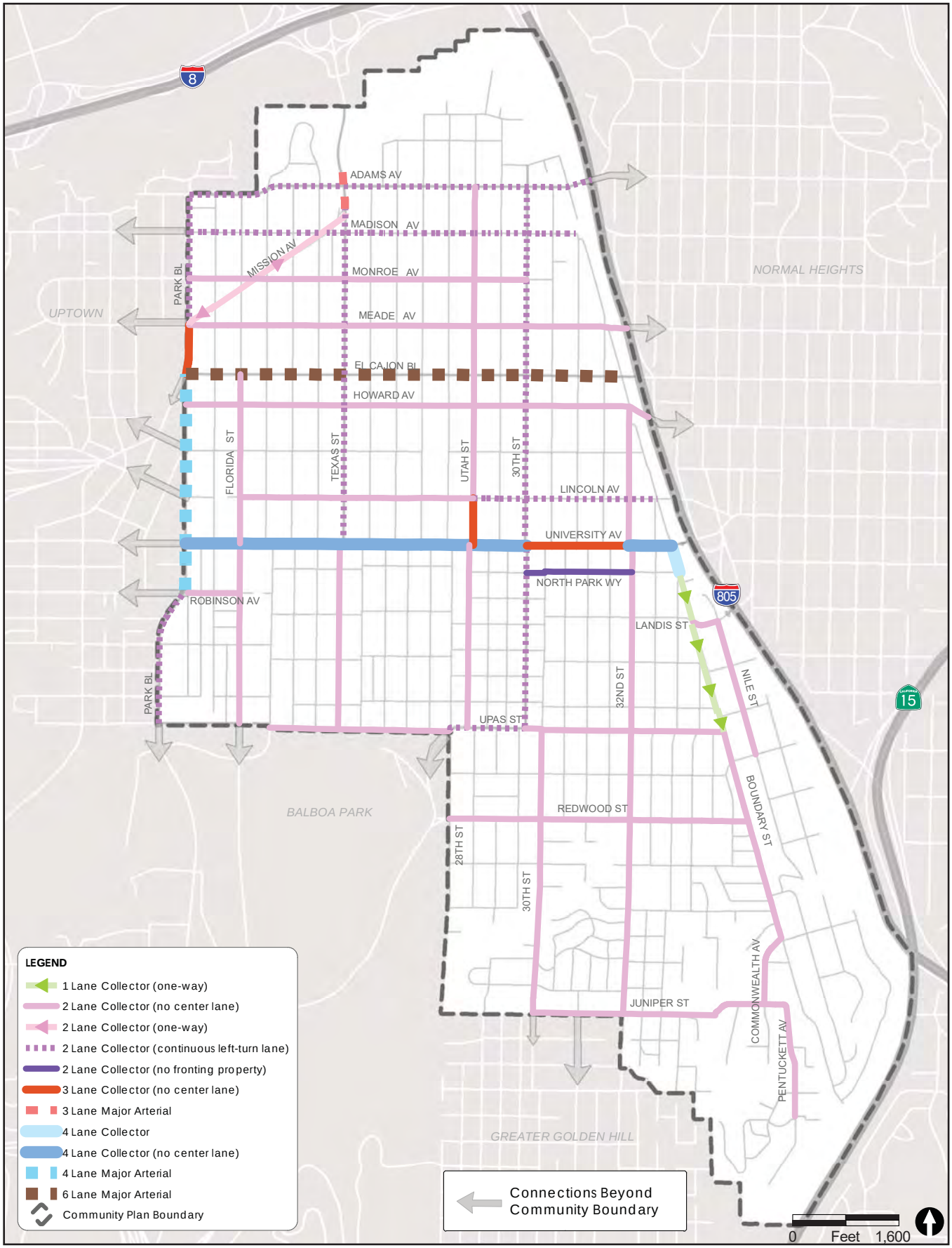


FIGURE 3-4

Future Roadway Classifications – North Park

Map Source: SanGIS

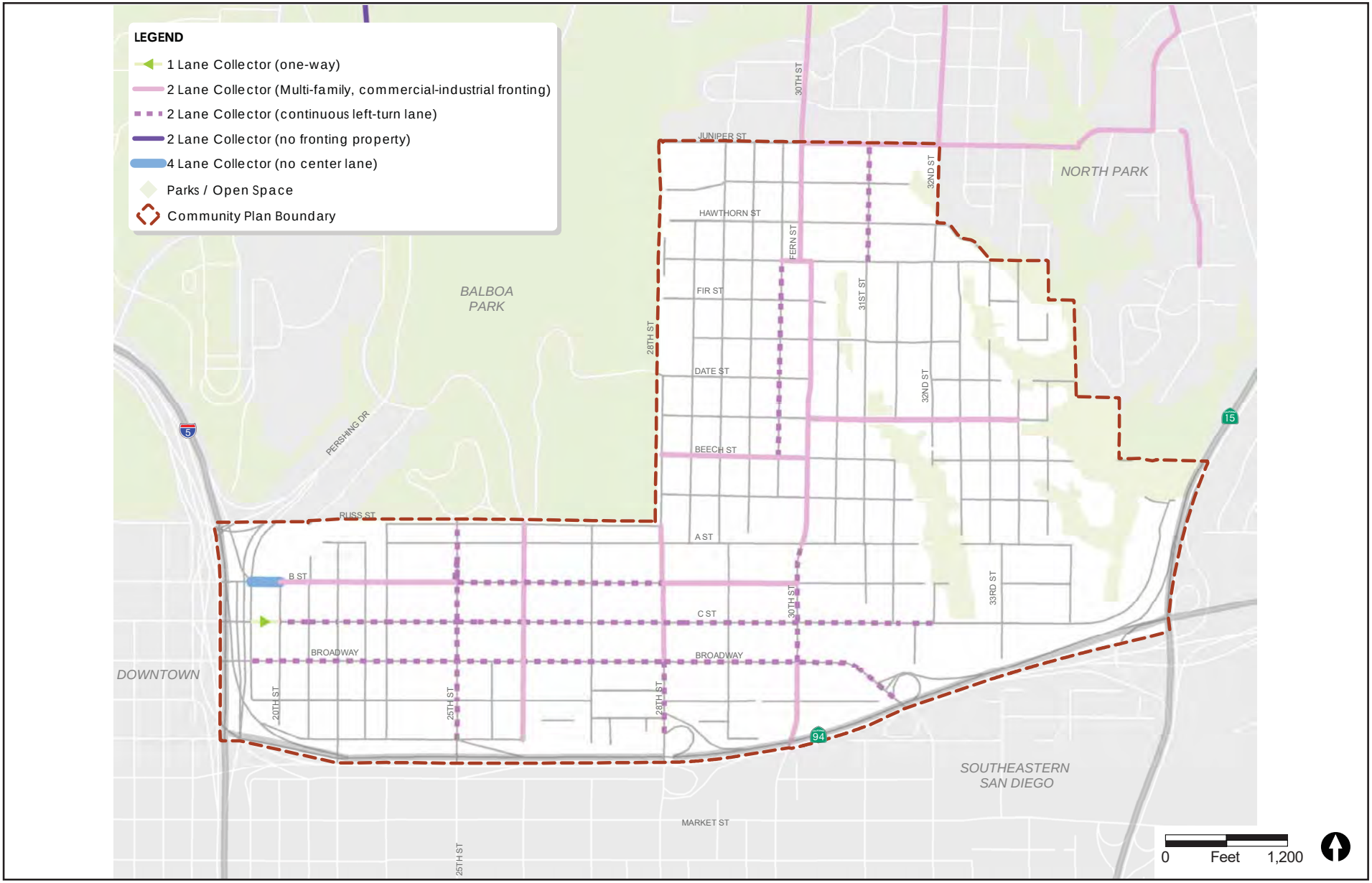


FIGURE 3-5

Future Roadway Classifications – Golden Hill

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3.4.1.5 Public Facilities, Services, and Safety Element

The proposed North Park and Golden Hill Public Facilities, Service, and Safety Elements identify and propose public facilities and services intended to serve existing and future residents, including educational facilities, public safety services, and infrastructure systems. These elements provide policies regarding police and fire services, schools and public libraries, public utilities, geological and seismic hazards, flooding hazards, fire hazards, and hazardous materials. The Public Facilities, Services and Safety Elements are contained within Chapter 6 of both the proposed North Park and Golden Hill CPUs.

3.4.1.6 Recreation Element

The proposed North Park and Golden Hill Recreation Elements provide goals and policies and identify opportunities to create a more comprehensive park strategy. The proposed CPUs call for the acquisition and development of new parks and associated recreation facilities, improving existing parks in order to expand active and passive recreational use, and provide access to trails and open spaces. These elements identify existing parks, proposed parks, and the use of park equivalencies to provide additional recreation opportunities. Proposed park sites may be acquired and/or developed as park land by the City. Where undeveloped land is limited, unavailable or cost-prohibitive, the General Plan allows for the application of park equivalencies to be determined by the community and City staff. Park equivalencies include joint use facilities, trails, privately owned publicly accessible parks, non-traditional parks (such as rooftop or indoor recreation facilities), portions of resource-based parks, and park facility expansions or upgrades. Both plan areas are urbanized communities where park equivalencies are appropriate for satisfying some of the communities' population-based park needs. The proposed Recreation Elements are contained within proposed Chapter 7 of both the North Park and Golden Hill CPUs.

3.4.1.7 Conservation and Sustainability Element

The proposed North Park Sustainability and Conservation Element and the Golden Hill Conservation Element provide goals and policies to effectively manage, preserve, and enhance natural resources in the community. These elements address open space and landform preservation, urban runoff management, water resource management, air quality, and waste diversion. These elements support sustainability through policies and land use guidance that provide for economic resiliency, resource conservation, renewable energy, and enhancement of habitat and the urban forest. Strategies included in these elements address development and use of sustainability and energy generation types, including; reuse or recycling of building material; adaptively retrofitting and reusing existing buildings; constructing energy-efficient buildings with healthy and energy-efficient interior environments; creating quality outdoor living spaces; and improving materials recycling programs and sustainable local food practices.

Development in the community plan areas will also generally occur as infill projects, focusing on vacant or under-utilized parcels or previously utilized lots rather than on undeveloped land with high natural resource values. The proposed Conservation and Conservation and Sustainability Elements are contained within Chapter 8 of both the proposed North Park and Golden Hill CPUs.

3.4.1.8 Noise Element

The proposed North Park Noise and Light Element and the Golden Hill Noise Element provide goals and policies to noise. Additionally, the North Park Noise and Light Element contains policies related to light that address excessive glare, light spillage, and the need for community lighting projects. Both elements contain policies addressing noise compatibility, including commercial, traffic, and airport noise and identify future noise contours from freeways and major roads in the community. The North Park Noise and Light Element and the Golden Hill Noise Element are contained within Chapter 9 of both the proposed North Park and Golden Hill CPUs.

3.4.1.9 Historic Preservation Element

Both plan areas have rich historical resources representing human settlements that date hundreds of years into the past. The Historical Preservation Elements describe the archaeological and historic context and history of the built environment in North Park and Golden Hill. The Historic Preservation Elements focus on the protection of the communities' historical and cultural resources, and support educational opportunities and incentives to highlight, maintain, and preserve historic resources. These elements provide a framework for evaluating individual historic properties and districts for the National Register of Historic Places, California Register of Historic Places, and the San Diego Register of Historic Resources. Specific policies for each plan area are provided to identify, preserve, and promote education and awareness of the communities' historic resources.

The proposed Historic Preservation Elements identify Potential Historic District Boundaries within each community that are intended to provide interim protection measures to prevent the loss of the overall integrity of Potential Historic District. Additional detail about implementation of Potential Historic District is discussed in Section 3.4.2.2 below.

The Historic Preservation Elements are contained within Chapter 10 of both the proposed North Park and Golden Hill CPUs.

3.4.1.10 Arts and Culture Element (North Park)

The proposed North Park Arts and Culture Element (Chapter 11 of the proposed North Park CPU) describes the artwork, music, and other cultural expressions that articulate the community character and enrich the public realm. This element supports the creation and maintenance of art in the public realm and cultural activities in the communities to ensure that they continue to be integral and defining characteristics of the community. The proposed Golden Hill Community Plan does not contain a stand-alone Arts and Culture Element, but contains policies related to arts and culture in the Urban Design and Economic Prosperity Elements.

3.4.1.11 Implementation

The CPUs include an Implementation chapter that describes future actions that would need to be implemented. Future implementation actions are described below and detailed in Chapters 12 and 11 of the North Park and Golden Hill CPUs, respectively.

- Regularly update Impact Fee Studies identifying the capital improvements and other projects necessary to accommodate present and future community needs as identified throughout the Community Plans.
- Implement facilities and other public improvements in accordance with the Impact Fee Studies.
- Pursue grant funding to implement unfunded needs identified in the Impact Fee Studies.
- Apply project design recommendations when properties develop in accordance with the proposed CPUs.
- Pursue formation of Assessment Districts, Business Improvement Districts, and Parking Districts, as appropriate, through the cooperative efforts of property owners and the community in order to construct and maintain improvements.

3.4.2 Land Development Code Amendments

3.4.2.1 Amendments to and Repeal of Planned District Ordinance

The project would amend the Mid-City Communities Planned District to remove North Park from the Regulations and repeal the GHPDO and rezone parcels with existing and modified Citywide zones to implement the proposed land use plan designations.

3.4.2.2 Amendment to the Historical Resources Regulations

The project includes an amendment to the Historical Resources Regulations of the Municipal Code (Sections 143.0210 et seq.) to provide supplemental development regulations for Potential Historic Districts as adopted by the City Council at the review and consideration of the CPUs (see Figures 6.7-4 and 7.7-4 of this PEIR). These regulations would provide interim protections to the integrity of the specified potential historic districts within the CPU areas by requiring an evaluation of proposed modifications to applicable residential structures within the boundaries of the proposed Potential Historic District. These supplemental regulations would apply to single- and multi-family residential structures within the Potential Historic Districts.

Applicable residential structures would be subject to the following requirements:

- No modifications allowed to the front 2/3 of the original building footprint unless the modification will repair existing historic materials or restore the building to its historic appearance.
    - Exception: Improvements exempt from building permits pursuant to SDMC 129.0203, as well as improvements identified in SDMC 143.0212(a)(1)-(4) (same standard as applied to 45-year review).
    - Exception: Deviation may be approved though a Process 2 Neighborhood Development Permit. Projects will be reviewed for consistency with the US Secretary of the Interior Standards (similar to 45-year review) and the following findings must be made.

- ✓ All feasible measures to protect and preserve the integrity of the potential historic district have been provided; and,

- ✓ The proposed deviation is the minimum necessary to afford relief and accommodate the development and all feasible measures to mitigate for any impacts to the potential historic district have been provided; and,

- ✓ The proposed project will not result in a loss of integrity within the potential historic district which would render it ineligible for historic designation.

Projects subject to the supplemental development regulations for the specified Potential Historic District that would deviate from the regulations would require a Neighborhood Development Permit (NDP). Thus, the project includes amendments to the NDP regulations to add the requirement that a NDP is required for development impacting single dwelling unit and multiple dwelling unit structures on a parcel containing a potential contributing resource within the City Council specified Potential Historic District. The NDP revisions would add supplemental findings applicable to these projects.

3.4.3 Zone Changes

3.4.3.1 Citywide Rezoning

Throughout the CPU areas, Citywide zoning will be applied in all areas as shown on Figures 3-6 and 3-7 and described in Section 3.4.3.2 below. Proposed densities will be consistent with existing zoning with the exception of Community Enhancement Areas in the North Park CPU area where increased density and modified development regulations would be allowed with processing of a PDP.

Table 3-3 summaries the existing zones used in North Park and Table 3-4 summaries the proposed zoning changes for North Park. The proposed Planned District Ordinance to Citywide zone conversions for Golden Hill are shown in Table3-5.

Map Source: SanGIS

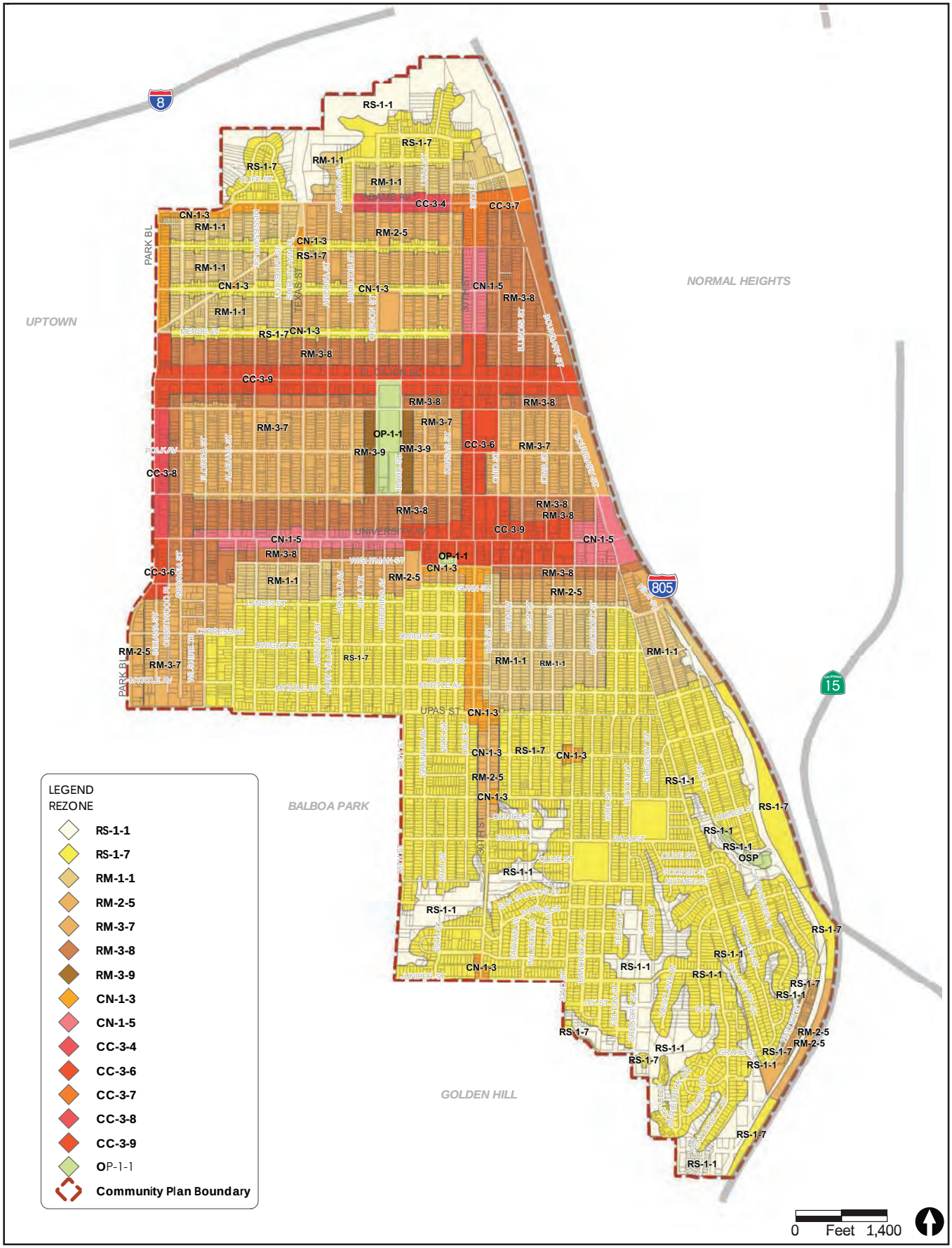


FIGURE 3-6
Proposed Zoning – North Park

Map Source: SanGIS

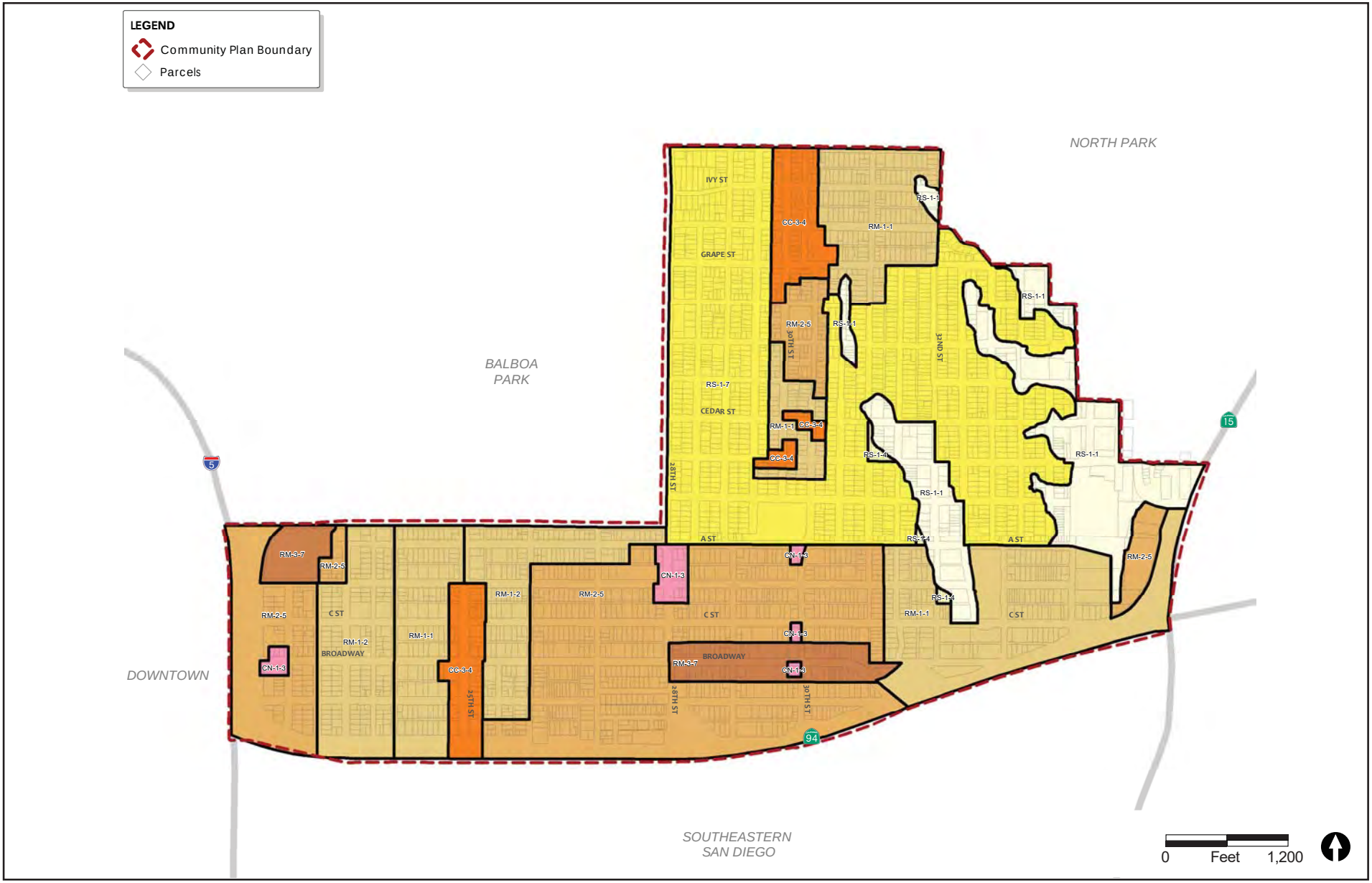


FIGURE 3-7
Proposed Zoning – Golden Hill

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Table 3-3 North Park Current Zoning	
Current Zone	Maximum Residential Density
Mid-City Communities Planned District Zones	
MR-3000	15 du/ac
MR-1750	25 du/ac
MR-1500	29 du/ac
MR-1250B	Lot size < 10,000 sf = 35 du/ac Lot size ≥ 10,000 sf = 44 du/ac
MR-1000	44 du/ac
MR-800B	Lot size < 15,000 sf = 54 du/ac Lot size ≥ 15,000 sf = 73 du/ac
CL-5	29 du/ac
CN-3	44 du/ac
CV-3	44 du/ac
CL-2	Lot size < 10,000 sf = 44 du/ac Lot size ≥ 10,000 sf and < 15,000 sf = 54 du/ac Lot size ≥ 15,000 sf = 73 du/ac
CL-1	Lot size < 15,000 sf = 54 du/ac Lot size < 30,000 sf = 73 du/ac Lot size ≥ 30,000 sf = 109 du/ac
CN-1	Lot size < 30,000 sf = 73 du/ac Lot size ≥ 30,000 sf = 109 du/ac
Citywide Zones[1]	
RS-1-1[1]	1 du/ac
RS-1-7[1]	9 du/ac
RM-1-1[2]	15 du/ac
RM-2-5[2]	29 du/ac
CN-1-2[2]	29 du/ac
CC-3-5[2]	29 du/ac

[1] Citywide zones RS-1-1 and RS-1-7 are currently utilized in the areas of the community designated as open space and single family.
[2] In limited instances the PDO zones have been rezoned to Citywide zones as part of a development project approval.

Table 3-4 North Park Proposed Zoning	
Proposed Zone	Maximum Residential Density (dwelling unit per acre)
OP-1-1	--
RS-1-1	1 du/ac
RS-1-7	9 du/ac
RM-1-1	15 du/ac
RM-2-4	29 du/ac
RM-2-5	29 du/ac
RM-2-6[1]	44 du/ac
RM-2-7[1]	44 du/ac
RM-3-7[1]	44 du/ac
RM-3-8	54 du/ac
RM-3-9	73 du/ac
CN-1-3	29 du/ac
CN-1-5	73 du/ac
CC-3-4	29 du/ac
CC-3-6	44 du/ac
CC-3-7	54 du/ac
CC-3-8[21]	73 du/ac
CC-3-9[32]	109 du/ac

[1]Pedestrian-Oriented Infill Development Enhancement Program allows a residential density bonus up to 73 du/ac for applicants with existing development projects of 6 units or more within the program area between Lincoln Avenue and Howard Avenue.

[2]Transit-Oriented Development Enhancement Program allows a residential density up to 145 du/ac along Park Boulevard via Planned Development Permit

[23]Transit-Oriented Development Enhancement Program allows a residential density up to 145 du/ac along Park Blvd and El Cajon Boulevard via Planned Development Permit

Table 3-5 Comparison between Golden Hill Planned District and Proposed Citywide Zoning	
Golden Hill Planned District	Compatible Citywide Zones
GH-3000	RM-1-1
GH-2500	RM-1-2
GH1500	RM-2-5
GH-1000	RM-3-7
GH-CN	CN-1-3
GH-CC	CC-3-4

3.4.3.2 Applicable Citywide Zones

a. RS Zones

The purpose of the RS zones is to provide appropriate regulations for the development of single dwelling units that accommodate a variety of lot sizes and residential dwelling types and which promote neighborhood quality, character, and livability. It is intended that these zones provide for flexibility in development regulations that allow reasonable use of property while minimizing adverse impacts to adjacent properties. The following RS zones, described in Table 3-6, would be applied in the CPU areas:

- RS-1-1 requires minimum 40,000-square-foot lots
- RS-1-7 requires minimum 5,000-square-foot lots

Table 3-6
Proposed RS Zones within CPU Areas

Zone	Max. Density	Max. Height	Max. FAR	Applicable Community Plan
RS-1-1	1 du/ac (1 du/ 40,000 sf)	24/30 feet	.45	North Park and Golden Hill
RS-1-7	9 du/ac	24/30 feet	Varies; on lots less than 10,000 square feet a single dwelling unit shall be limited to 6 bedrooms maximum	North Park and Golden Hill

b. RM Zones

The purpose of the RM zones is to provide for multiple dwelling unit development at varying densities. The RM zones individually accommodate developments with similar densities and characteristics. Each of the RM zones is intended to establish development criteria that consolidate common development regulations, accommodate specific dwelling types, and respond to locational issues regarding adjacent land uses. The following RM zones, described in Table 3-7, would be applied in the CPU areas:

- RM-1-1 is intended to allow a mix of Low to Medium residential density (up to 15 dwelling units per acre).

- RM-1-2 is intended to allow a mix of Low to Medium residential density (up to 17 dwelling units per acre).

- RM-2-4 and RM-2-5 ~~is~~ are intended to allow Medium residential density (up to 29 dwelling units per acre).

- RM-2-6 and RM-2-7 are intended to allow Medium residential density (up to 44 dwelling units per acre).

- RM-3-7 is intended to allow a mix of Medium residential density (up to 44 dwelling units per acre) with limited ground floor neighborhood serving commercial uses with a pedestrian orientation.

- RM-3-8 is intended to allow a mix of Medium–High residential density (up to 54 dwelling units per acre) with limited ground floor neighborhood serving commercial uses with a pedestrian orientation.

- RM-3-9 is intended to allow a mix of high residential density (up to 73 dwelling units per acre) with limited ground floor neighborhood serving commercial uses with a pedestrian orientation.

Table 3-7
Proposed RM Zones within CPU Areas

Zone	Maximum Density	Maximum Height	Maximum FAR	Applicable Community Plan
RM-1-1	15 du/ac	30 feet	.75	North Park and Golden Hill
RM-1-2	17 du/ac	30 feet	.90	Golden Hill
RM-2-5	29 du/ac	40 feet	1.35	North Park and Golden Hill
RM-3-7	44 du/ac	40 feet	1.80	North Park and Golden Hill
RM-3-8	54 du/ac	50 feet	2.25	North Park
RM-3-9	73 du/ac	60 feet	2.70	North Park

c. CN Zones

The purpose of the CN zones is to provide residential areas with access to a limited number of convenient retail and personal service uses. The CN zones are intended to provide areas for smaller scale, lower intensity developments that are consistent with the character of the surrounding residential areas. The zones in this category may include residential development as part of mixed-use developments. Property within the CN zones will be primarily located along local and selected collector streets. The following CN zones, described in Table 3-8, would be applied in the CPU areas:

- CN-1-3 is intended to allow for neighborhood commercial with up to 29 dwelling units per acre as part of a pedestrian-oriented mixed-use development.
- CN-1-5 is intended to allow neighborhood commercial development with up to 73 dwelling units per acre as part of pedestrian-oriented mixed-use development.

Table 3-8 Proposed CN Zones within CPU Areas				
Zone	Maximum Density	Maximum Height	Maximum FAR	Applicable Community Plan
CN-1-3	29 du/ac	30 feet	1.0	North Park and Golden Hill
CN-1-5	73 du/ac	65 feet	2.2	North Park

d. CC Zones

The purpose of the CC zones is to accommodate community-serving pedestrian-oriented commercial services, retail uses in a mixed use setting. The CC zones are intended to provide for a range of development patterns from pedestrian-friendly commercial streets to shopping centers. All of the CC zones in the North Park and Golden Hill Communities allow residential development. Property within the CC zones will be primarily located along collector streets, major streets, and public transportation lines. The following CC zones, described in Table 3-9, would be applied in the CPU areas:

- CC-3-4 is intended to accommodate development with a pedestrian orientation, and Low to Medium density.
- CC-3-6 is intended to accommodate development with a high intensity, pedestrian orientation, and Medium density.
- CC-3-7 is intended to accommodate development with a high intensity, pedestrian orientation, and Medium–High density.
- CC-3-8 is intended to accommodate development with a high intensity, pedestrian orientation, and High density.
- CC-3-9 is intended to accommodate development with a high intensity, pedestrian orientation, and Very High density.

Table 3-9 Proposed CC Zones within CPU Areas				
Zone	Maximum Density	Maximum Height	Maximum FAR	Applicable Community Plan
CC-3-4	29 du/ac	30 feet	1.0	North Park and Golden Hill
CC-3-6	44 du/ac	65 feet	2.0/2.0/1.0	North Park
CC-3-7	54 du/ac	65 feet	2.0/2.5/1.0	North Park
CC-3-8	73 du/ac	100 feet	2.0/2.5/1.0	North Park
CC-3-9	109 du/ac	unlimited	2.0/3.0/1.0	North Park

e. OR Zones

The purpose of the OR zones is to preserve privately owned property that is designated as Open Space in a land use plan for such purposes as preservation of public health and safety, visual quality, sensitive biological resources, steep hillsides, and control of urban form, while retaining private development potential. These zones are also intended to help implement the habitat preservation goals of the City and the Multi-Habitat Planning Area (MHPA) by applying development restrictions to lands wholly or partially within the boundaries of the MHPA. Development in these zones will be limited to help preserve the natural resource values and open space character of the land. The OR-1-1 zone would be applied in CPU areas.

3.4.3.3 Zoning Amendments

The project includes changes to the Neighborhood and Community Commercial Citywide zones as follows:

- Add an Artisan Food and Beverage Producer as a separately regulated use in Chapter 14.
- Chapter 13 Neighborhood Commercial (CN) Use Tables:
    - Change CN-1-5 zone to allow up to 73 du/ac
    - Permit Visitor Accommodations in CN zones
    - Add Artisan Food and Beverage Producer under Industrial Separately Regulated as a Neighborhood Use Permit in the CN-1 zones
- Chapter 13 Community Commercial (CC) Use Tables:
    - Permit Museums in CC-3 zones
    - Make Eating and Drinking Establishments with a Drive-In or Drive-Thru Component as a CUP and add language in the community plan Land Use Element discouraging these uses.
    - Add Artisan Food and Beverage Producer under Industrial Separately Regulated Use as a Limited Use in all CC zones.

    Chapter 13 Footnote #4: Add: Within the North Park Community Plan area, full alcohol sales are permitted in the CN zones.
- CN-1-3 Zone: Prohibit Back Patios, Seating Areas and Roof Top Decks
- Within Footnote #16, include the following language: Eating and drinking establishments abutting residential development located in a residential zone may operate only between 6:00 a.m. and 12:00 midnight. All uses or activities shall be conducted entirely within an enclosed building and front onto the primary street with no uses or commercial activities conducted outdoors, in the rear yard or adjacent to Residentially zoned properties. This includes garage doors, roll up doors, or outdoor commercial activities.

- Revise Section 131.0556 – Parking Lot Orientation to require parking for sites under 50,000 be behind buildings.
- Revise Section 132.0905 – To allow Tandem Parking in North Park as a Process 1.

3.4.4 Impact Fee Studies

The project includes adoption of Impact Fee Studies (IFS) (formerly known as Public Facilities Financing Plans) that address the need for public facilities associated with the identified needs of the North Park and Golden Hill CPU areas. City Council adopted the current North Park IFS in 2002 and the Golden Hill IFS in 2004. The IFSs set forth the major public facilities' needs in the areas of transportation (streets, sidewalks, storm drains, traffic signals, etc.), libraries, park and recreation facilities, and fire stations that are needed to serve the communities. Updated IFSs for North Park and Golden Hill would be used to determine the public facilities' needs associated with the proposed CPUs. They include potential funding sources for financing public facilities, including development impact fees and a variety of potential funding sources.

Potential funding mechanisms include:

- Institution of impact fees for new development.
- Requiring certain public improvements as part of new development.
- Establishing Community Benefit Assessment Districts, such as property-based improvement and maintenance districts for streetscape, lighting, and sidewalk improvements.

The IFSs identify and prioritize improvements to public facilities. Improvements vary widely in their range and scope; some could be implemented incrementally as scheduled street maintenance occurs, and others would require significant capital funding from city, state, regional, and federal agencies, or are not feasible until significant new development occurs. A complete list of projects is included in the IFSs.

3.4.5 MHPA Boundary Line Corrections

The project includes comprehensive community-wide Multi-Habitat Planning Area (MHPA) boundary line corrections associated with the proposed North Park and Golden Hill CPUs. The areas designated by the existing community plan as open space and areas within the MHPA were reviewed, in coordination with the Wildlife Agencies, for their applicability to conservation of Environmentally Sensitive Lands (ESL). It was determined that some areas had previously been mapped to include what appeared to be a significant extent of existing development (i.e., houses, streets) while other areas containing sensitive biological resources were not included.

A comprehensive, systematic approach was developed in order to evaluate areas of existing developed land that should be removed, as well as areas where biological resources should be added. The boundary line corrections generally removed existing developed areas in addition to the 35-foot brush management zone 1 area as required in accordance with the City's Land Development Code, Section 142.0412. The comprehensive MHPA boundary corrections for both the North Park and Golden Hill CPU areas would result in removal of acreage of existing developed lands from the

MHPA and an addition of sensitive habitats including coastal sage scrub and chaparral. For specific acreage of vegetation communities/land cover proposed for addition and removal from the MHPA, refer to Chapters 6.8 (North Park) and 7.8 (Golden Hill).

3.5 Environmental Design Considerations

Several environmental design considerations, beyond compliance with mandatory existing regulations, have been incorporated into the proposed CPUs as recommendations within policies to avoid or reduce environmental impacts. These are described below.

3.5.1 Sustainability

Sustainable building concepts and practices have been incorporated into the proposed policies within various elements of the proposed CPUs. Implementation of these policies will serve to reduce or avoid potential environmental effects associated with water and energy consumption, consumption of non-renewable or slowly renewing resources, and urban runoff.

3.5.2 Village Districts, Transit Corridors, and Enhancement Program Areas

Development completed in accordance with the proposed CPUs would occur in an existing urbanized area with established transportation infrastructure, including existing and future transit service. Most future development is expected to occur within proximity of areas served by transit, which may reduce vehicle trips and vehicle miles traveled. In addition, implementation of the policies contained in the Land Use, Mobility, Recreation, and Conservation Elements of the proposed CPUs would improve mobility within the CPU areas, by promoting development of a balanced, multi-modal transportation network, including better pedestrian and bicycle mobility. Implementation of proposed Land Use Policies LU-3.1 through LU-3.14 (North Park) and LU-2.30 (Golden Hill) supports the integration of transit within mixed use residential and employment areas and encourages the creation of safe and direct bicycle and pedestrian connections to provided multi-modal access. Policies that support walking and bicycling as transportation choices could also reduce vehicle trips and miles traveled.

3.5.3 Transit

While the intent of the proposed Mobility Elements is to provide a more cohesive transportation network, policies ME-2.1 through ME-2.12 in the proposed North Park CPU and ME-2.1 through ME-2.8 in the proposed Golden Hill CPU specifically address transit services and facilities, including improving the environment surrounding transit stops, and working with the San Diego Metropolitan Transit System to incorporate transit priority measures.

3.5.4 Recreation

The proposed Recreation and Conservation Elements contain policies intended to create a sustainable park and recreation system that meets the needs of North Park and Golden Hill's residents and visitors by increasing the quantity and quality of recreation facilities.

3.5.5 Urban Runoff/Water Quality

The CPU areas are currently developed. Nearly all rainfall can be expected to become runoff because there are minimal opportunities for infiltration except within natural open space. Proposed Golden Hill Urban Runoff Management Policies CE-2.13 through CE-2.16 and North Park Policies SC-3.12 through SC-3.15 seek to reduce potential impacts by encouraging the use of Low Impact Development (LID) techniques and materials that slow water runoff and absorb pollutants from roofs, parking areas, and other urban surfaces; incorporating bioswales or other design practices where there are sufficient public rights-of-way throughout the community; and encouraging private property owners to design or retrofit landscaped areas to better capture storm water runoff.

3.5.6 Diversity and Affordability of Housing

The land use plans for the CPUs propose a range of single-family and multi-family housing densities intended to provide a range of housing types, including moderate and high densities that typically could allow a mix of market rate and subsidized multi-family units. This could enable a wider range of economic levels and age groups to live within these communities including the ability to house multiple familial generations within the same community. Specifically, the proposed North Park Land Use Element contains policies related to the production of affordable housing units contained in policies LU-4.6 through LU-4.11 that promote and encourage the development of very low and low income affordable housing in all residential and multi-use neighborhood designations; creation of affordable home ownership opportunities for moderate income buyers; and utilization of land-use, regulatory, and financial tools to facilitate the development of housing affordable to all income levels. The proposed Golden Hill Land Use Element encourages a diverse mix of housing types in LU-2.1 through LU-2.3.

3.5.7 Bicycle Network

In order to reduce reliance on fossil fuels and encourage alternative modes of transportation, the proposed CPUs aim to provide a safe and convenient bicycle network that connects community destinations and links to surrounding communities and the regional bicycle network. In support of this goal, the North Park Mobility Element includes Bicycle Policies ME-1.14 through ME-1.18. The Golden Hill Mobility Element includes Policies ME-1.7 through ME-1.11 in support of these goals. Specifically, implementation of North Park Mobility Element Policy ME-1.14 would support and implement bicycle priority streets and facilities that connect North Park to neighboring communities with emphasis on constructing bikeways in the bicycle network, and implementing and building upon the San Diego Bicycle Master Plan. In addition, North Park Mobility Element Policy ME-1.16 calls for increasing bicycle comfort and accessibility for all levels of bicycle rides with improvements such as signage, marking, and wayfinding for bicycles, directing them to points of interest within

North Park and adjacent communities, actuated by signal timing for bicycles, priority parking for bicycles, wider bike lanes, and—where feasible—separated bicycle facilities.

3.5.8 Access to Outdoor and Active Spaces

The proposed CPUs address existing and planned access to outdoor and active spaces, and provide recommendations for additional outdoor recreation opportunities, including land acquisition for creation of public parks within each community. On-site open space within new multi-family development is also recommended. Access is to be improved per policies for better pedestrian and bicycle access to open space within canyons as well as Balboa Park. This would foster walking or other physical activity and time spent outdoors, thus promoting better health and community life. Many of the outdoor and active uses would be universally accessible.

Strategies to expand programming within existing public spaces to reduce the existing parkland deficit in the plan area are also included in the proposed CPUs. The Recreation Elements include policies to provide parkland to meet needs of each community through plan build-out (North Park Policies RE-1.1 through RE-1.15 and Golden Hill Policies RE-1.1 through RE-1.12); provide for preservation, protection, and enhancement of existing and planned parkland facilities (North Park Policies RE-2.1 through RE-2.9 and Golden Hill Policies RE-2.1 through RE-2.6); ensure accessibility of parkland to all residents and visitors (North Park Policies RE-3.1 through RE-3.4 and Golden Hill Policies RE-3.1 through RE-3.5); and to preserve, protect, and enhance/restore resources associated with existing and proposed open space (North Park Policies RE-4.1 through RE-4.8 and Golden Hill Policies RE-4.1 through RE-4.6).

3.5.9 Improved Transportation Network and Increased Alternative Modes of Transportation

The proposed CPUs include several policies intended to improve the existing transportation network, as well as encouraging alternative modes of transportation to reduce impacts related to traffic/circulation and air quality. The Mobility Elements support and help implement the General Plan at the community level by including specific policies and recommendations that will improve mobility through the development of a balanced, multi-modal transportation network. Specifically, the North Park Mobility Element includes Walkability Policies ME-1.1 through ME-1.13, which promote and encourage the new construction of, and upgrades to, existing pedestrian pathways; Transit Policies ME2.1 through ME-2.12 in the North Park plan, which improve access to public transit facilities (i.e., San Diego Trolley); Intelligent Transportation System Policies ME-4.1 through ME-4.3 in the North Park Community plan, which promote smart parking technology; and Bicycle Policies ME-1.14 through ME-1.19 in the North Park plan, which promote a continuous network of bicycle facilities connecting the CPU areas to the Citywide bicycle network and bicycle parking facilities. In support of General Plan Policies UD-D-1 through D-3, the North Park Land Use Element Section 2.8 focuses the highest intensity development (residential and non-residential) on the Mid-City Bus Rapid Transit Corridor to capitalize on access to transit, boost transit ridership, and reduce reliance on driving.

The Golden Hill Mobility Element includes Policies ME-2.1 through ME-2.8 that support and promote San Diego Metropolitan Transit System/San Diego Association of Governments (SANDAG) efforts to improve public transit by extending hours of operation into the evening hours and increasing frequency of service during peak travel times; promote infrastructure that enhances accessibility and improves the transit user's experience at transit stops; incorporate additional infrastructure such as benches, shade structures, and timetables at transit stops whose sidewalk depth is sufficient; install electronic arrival schedules where appropriate; implement real time transit schedule updates to provide timely and efficient loading; and implement transit priority measures to improve transit travel times. Transit priority measures include, but are not limited to, transit signal priority for buses, queue jumpers, exclusive transit lanes, transit ways, use of freeway shoulders, and direct access ramps to freeway High Occupancy Vehicle (HOV) facilities; implement balanced multi-modal concepts, as appropriate, with ongoing transportation and congestion relief programs such as the Transportation Demand Management Program, Street Smarts Traffic Safety Program, Residential Traffic Calming Program, Safe Routes to School Program, and TRAFFIX Program; and include bicycle and pedestrian infrastructure improvements to avoid adverse impacts to existing and planned bus services to the area.

3.5.10 Energy Efficiency in Buildings

The Urban Design and Conservation/Sustainability Elements of the proposed CPUs include policies to reduce air, water, and land pollution, and other environmental impacts associated with energy production and consumption. The Urban Design Elements recommend that development of new infill buildings and retrofitting of existing buildings should incorporate energy-efficient design measures. In particular, the North Park Urban Design Element states that North Park can be a model of sustainable development that demonstrates how to build responsibly within the limits of our resources. Specifically, North Park Policies UD-3.58 through UD-3.76 address sustainable building design; access to light and air; and historic preservation and adaptive reuse.

The proposed Golden Hill Conservation Element Policies CE-1.1 through CE-1.3 address energy efficiency and sustainable building design by encouraging new development to build upon the community's existing street grid network to create a more functional environment for pedestrians and bicyclists and reduce local dependence on automobile transportation (refer to the proposed Golden Hill CPU Urban Design Element Section 4.2, *Streetscape and Public Realm*, and the proposed Golden Hill CPU Mobility Element Section 3.1, *Active Transportation* Section); and by incorporating sustainable building practices that would reduce development project-level greenhouse gas emissions.(refer to the proposed Golden Hill CPU Urban Design Element Section 4.3, *Green Building Practices and Sustainability*). The proposed Golden Hill CPU also promotes the continued use or adaptive reuse of existing buildings in conjunction with any needed upgrades to their energy use efficiency as part of a comprehensive energy-reduction strategy

3.5.11 Air Quality

The proposed Conservation/Sustainability Elements include policies to reduce the project's impacts on air quality and climate change. The proposed North Park CPU Conservation Element includes Air Quality Policies SE-4.1 through SE-4.6 and the proposed Golden Hill includes Policies CE-3.1 through

CE-3.2 and LU-1.2, which encourage alternative modes of transportation, create incentives to encourage relocation of incompatible uses that contribute to poor air quality, and encourage street tree and private tree planting programs throughout the community to increase absorption of carbon dioxide and pollutants. In addition, implementation of Section 8.2 (Climate Change/Sustainability) in both proposed CPUs aims to reduce project-level greenhouse gas emissions to acceptable levels through project design, application of site-specific mitigation measures, or adherence to standardized measures outlined in an adopted Citywide Climate Action Plan. The policies contained in the community plans related to Climate Change and Sustainability are included as SE-2.1 through SE-4.4 in the proposed North Park CPU.

3.5.12 Urban Forestry, Urban Agriculture, and Sustainable Landscape Design

The Sustainability and Conservation Element for North Park includes policies for supporting a strategy for creating local healthy food systems and ensuring that local development regulations allow for small-scale, compatible agricultural use of property, including edible landscaping, community garden, and roadside food stands in appropriate areas of North Park. Furthermore, increasing the community's overall tree canopy to meet the Citywide target goal of 20 percent in urban residential areas and 10 percent in commercial areas to provide air quality benefits and urban runoff management. Policies SE-1.40 through SE-1.42 (North Park) support local food production. Urban Forestry policies SE-1.31 through SE-1.3.8 in the North Park plan encourage the implementation of programs for enhancing the urban forest. Golden Hill Urban Design Policies UD-2.38 through UD-2.40 support urban forestry efforts by incorporating shade-producing street trees along all streets and roadways as well as maximizing tree shade canopy.

3.6 Build-out of the Plans

Future development realized under the proposed land use maps is referred to as build-out. The proposed CPUs do not specify or anticipate when build-out will occur, as long-range demographic and economic trends are difficult to predict. However, for facility planning, technical evaluation, and environmental review purposes, build-out is assumed to occur in 2035.

3.6.1 Land Use Distribution at Plan Build-out

The amount of area in each generalized land use designation under the proposed North Park CPU is shown on Table 3-10.

Table 3-10 Proposed Land Use Classifications in North Park		
Community Plan Land Use	Acres	Percent
Residential		
Residential – Single	605	27%
Residential – Multi	554	25%
Residential Total	1,159	52%
Commercial and Office		
Visitor and Retail Commercial	101	4.4%
Office Commercial	9	0.4%
Commercial, Employment Total	110	5%
Institutional and Educational Facilities		
Institutional	21	1%
Education	28	1%
Institutional and Education Total	49	2%
Open Space and Parks		
Open Space	162	7%
Population-based Parks	19	1%
Parks and Open Space Total	181	8%
Roads		
Roads	753	33%
Total	**2,252**	**100%**
SOURCE: City of San Diego 2016a.		

The proportion of land in generalized planned land use designations under the proposed Golden Hill CPU is shown in Table 3-11.

Table 3-11 Proposed Land Use Classifications in Golden Hill		
Community Plan Land Use	Acres	Percent
Residential		
Residential – Single	179	24%
Residential – Multi	188	25%
Residential Total	367	49%
Commercial and Office		
Retail Commercial	23	3%
Office Commercial	2	<1%
Commercial, Employment Total	25	25.3%
Institutional		
Institutional Total	16	2%
Parks and Open Space		
Open Space	57	8%
Population-based Parks	0	0%
Parks and Open Space Total	57	8%
Roads		
Roads	281	38%
Total	**746**	**100%**
Source: City of San Diego 2016b.		

Table 3-12 describes the existing and proposed residential development anticipated to result from application of community plan land uses shown on the proposed North Park Land Use Map and the proposed Golden Hill Land Use Map on vacant and underutilized sites, according to analysis undertaken for the proposed CPUs. Table 3-13 shows the same for existing and proposed non-residential development. Total housing units represent the number of existing or proposed residential dwelling units, and household population represents the total number of people anticipated to reside in those units.

Table 3-12
Residential Development: Existing and at Proposed CPU Build-out

Residential Development	Existing Development		Proposed Plan Build-out (2035)		Difference	
	Residential Units	Percent of Total	Residential Units	Percent of Total	Change	Change (%)
North Park						
Single-Family Units[1]	5,797	23 %	5,117	14%	(680)	(12)%
Multi-Family Units[2]	19,228	77 %	31,453	86%	12,225	64%
Total Housing Units	25,025	100%	36,570	100%	11,545	46%
Household Population (persons)						
Household Population	46,420		73,170		26,750	58%
Golden Hill						
Single-Family Units[1]	3,100	43%	2,095	23%	(1,005)	(32)%
Multi-Family Units[2]	4,160	57%	7,120	77%	2,960	71%
Total Housing Units	7,260	100%	9,215	100%	1,955	27%
Household Population (persons)						
Household Population	15,800		24,010		8,210	52%

Notes:
[1]Includes detached single-family, multiple-unit single-family.
[2]Includes residential units in mixed-use development.
Sources: City of San Diego 2016a, 2016b.

Table 3-13 Non-Residential Development: Existing and at Proposed CPU Build-out						
	Existing Development		Proposed Plan Build-out (2035)		Difference	
Non-Residential Development	Non-Residential Building (square feet)	Percent of Total	Non-Residential Building (square feet)	Percent of Total	Change	Change (%)
North Park						
Commercial/Retail	2,097,660	60%	1,945,200	61%	(152,460)	(7) %
Office	356,420	10%	340,010	11%	(16,410)	(5) %
Industrial	42,850	1%	0	0%	(42,850)	(100)%
Institutional/ Community Facilities	909,380	26%	870,440	27%	(38,940)	(4) %
Recreational	72,430	2%	27,450	1%	(44,980)	(62)%
Utilities	11,900	1%	11,900	1%	0	0%
Total Non-Residential Development	3,490,640	100%	3,195,000	100%	(295,640)	100%
Golden Hill						
Commercial/Retail	231,650	36%	356,800	59%	125,150	54%
Office	37,160	1%	37,160	1%	0	100%
Industrial	112,750	17%	0	0%	(112,750)	(100)%
Institutional/ Community Facilities	266,380	41%	213,040	35%	(51,090)	(19)%
Total Non-Residential Development	647,9490	100%	607,000	100%	(38,590)	(6)%
Sources: City of San Diego 2016a, 2016b.						

3.6.2 Future Actions Associated with Plan Build-out

Due to the nature of an amendment to a community plan and a lack of site-specific development proposals associated with the proposed CPUs, site-specific environmental analyses of future development anticipated within the CPU areas are not undertaken within this PEIR. However, the analysis anticipates future development would occur within CPU areas and would be subject to applicable development regulations and requirements of the CPUs and this PEIR. Future development within the CPUs would involve subsequent approval of public and private development proposals through both ministerial and discretionary reviews in accordance with the LDC, the land use plans, and policies. These subsequent activities may be public (i.e., road/streetscape improvements, parks, public facilities) or private projects and are referred to as future development or future projects in the text of the PEIR. A non-inclusive list of discretionary actions that would occur as the CPUs are implemented are shown on Table 3-14.

Table 3-14 Potential Future Discretionary Actions Associated with Plan Build-out
City of San Diego
Subdivision Map Discretionary Permit Site Development Permit Establishment of Public Facilities Financing Mechanism Conditional Use Permit Neighborhood Development Permit Neighborhood Use Permit Planned Development Permit Variance Street Vacations, Release of Irrevocable Offers of Dedication, and Dedications Water and sewer infrastructure and road improvements
State of California
Caltrans Encroachment Permit Section 1602/1603 Streambed Alteration Agreement Water Quality Certification Determination for Compliance with Section 401 Department of Education approval of school sites
Federal Actions
U.S. Army Corps of Engineers Section 404 Permit USFWS Section 7 or 10 (a)
Other Agencies
SDG&E/Public Utilities Commission approval of power line relocations or undergrounding

4

Chapter 4
History of Project Changes Related to CEQA

4.1 NOP and Project Initiation

The City initiated the process of updating the Uptown, North Park and Golden Hill Community Plans in 2009, when the planning team began its analysis of existing conditions. The Notice of Preparation (NOP) for the Program Environmental Impact Report (PEIR) was issued on December 23, 2013 (State Clearinghouse No. 2013121076). A public scoping meeting was held on January 9, 2014, to gather agency and public input on the scope and content of the PEIR. Written comments were also received during the 30-day public comment period and are included as Appendix A of this PEIR. Potentially significant concerns and issue areas were defined based on the initial analysis of environmental setting and baseline conditions, and comments on the NOP, and are analyzed as part of this PEIR.

4.2 Community Outreach and Plan Development

Between 2009 and 2016, an extensive outreach program was undertaken to solicit input from residents, business owners, community leaders, public officials, and other interested parties. The outreach program included multiple Community Plan Update Advisory Committee (CPUAC) meetings on various land use topics, historic resources and mobility open house events, and a cluster workshop involving participants from each of the three communities to discuss urban design. Multi-day workshops or "charrettes" focusing on land use, areas of change and stability, urban design, mobility, historic resources, and recreation were conducted for each of the Community Plan Update (CPU) areas culminating in an urban design framework that would set the foundation for developing land use policies and recommendations. Additionally, "Open Mic Night" events were hosted by the City in an effort for community members to consider various perspectives from stakeholder organizations such as those representing local business districts, neighborhood-level organizations, historic preservation societies, planning and architectural organizations, and hospitals, as well as walkability, open space, and housing advocates. The policies and details of the CPUs were developed and shaped through this process.

4.3 Changes Based on Comments on the Draft Community Plans

Subsequent to the NOP in December 2015, the stakeholders in the Uptown CPU area continued to have comments and concerns regarding the recommended edits to their CPU, whereas the community groups for North Park and Golden Hill had largely completed their review of their individual CPUs and voted to proceed with key components of their respective CPU. Though multiple stakeholder organizations and residents have voiced opposition to aspects of the proposed CPUs, not every community comment or concern could be addressed. However, the City attempted to include stakeholder recommendations made following the NOP where feasible. An important change worth noting following the NOP involved adjustments to land use densities based on the requests of stakeholders and community comments in the North Park CPU. The recommended density changes have been supported by the community group, incorporated into the proposed North Park CPU, and analyzed in this PEIR

Given the continued outstanding concerns from the Uptown stakeholders, and in order to maintain overall progress and not unnecessarily delay all of the community plan updates, the City Planning Department made the decision to sever analysis of the Uptown CPU from this PEIR. Chapter 2 (Environmental Setting) and Chapter 5 (Regulatory Setting) have retained some discussions related to the adjacent CPUs because these chapters reflect background information and do not affect the analysis of the North Park and Golden Hill or Uptown in their respective PEIRs. The Uptown PEIR will be sent out for public review under separate cover and State Clearinghouse number.



Chapter 5
Regulatory Framework

For ease of comprehension, the discussions of environmental impacts in this draft Program Environmental Impact Report (PEIR) have been broken out in to specific chapters for each Community Olan Update (CPU) area: Chapter 6.0 for North Park and Chapter 7.0 for Golden Hill. While the environmental impacts are specific to each community's unique geography and character, the regulatory framework is largely shared amongst the communities. For this reason, the regulatory framework for each issue area is summarized in this chapter in the order in which the issue areas appear in this document. Where applicable, the individual differences in the regulatory framework of the communities are identified.

5.1 Land Use

Included within Section 3.0, Project Description, of this PEIR are descriptions of the existing land use plans that currently apply to the proposed CPU areas. The following expands the discussion of applicable plans and development regulations, including the General Plan, pertinent San Diego Municipal Code (SDMC) regulations, the City Multiple Species Conservation Program (MSCP) Subarea Plan, and the Airport Land Use Compatibility Plan.

5.1.1 City of San Diego General Plan

A comprehensive update of the City's General Plan was adopted in 2008, incorporating the City of Villages strategy, which in turn was developed and adopted as part of the Strategic Framework Element in 2002. The Strategic Framework Element represented the City's new approach for shaping how the City will grow while attempting to preserve the character of its communities and its most treasured natural resources and amenities. It was developed to provide the overall structure to guide the General Plan update and future community plan updates and amendments, as well as the implementation of an action plan. Table 5-1, summarizes the general land use categories that will be applied within the CPUs.

Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

The General Plan includes ten elements that are intended to provide guidance for future development. These are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Urban Design Element; (4) Economic Prosperity Element; (5) Public Facilities, Services, and Safety Element; (6) Recreation Element; (7) Conservation Element; (8) Noise Element; (9) Historic Preservation Element; and (10) Housing Element. The Housing Element, which must be updated every five years under state law, was last updated in 2014, and is provided under separate cover due to the need for more frequent updates. It is required to be consistent with the General Plan goals and City of Villages strategies.

Table 5-1
General Plan Land Use Categories

General Plan Land Use	Recommended Community Plan Designation	Use Considerations	Description	General Plan Density Range (du/ac[1])
Parks, Open Space, and Recreation	Open Space	None	Provides for the preservation of land that has distinctive scenic, natural, or cultural features; that contributes to community character and form; or that contains environmentally sensitive resources. Applies to land or water areas that are undeveloped, generally free from development, or developed with very low-intensity uses that respect natural environmental characteristics and are compatible with the open space use. Open Space may have utility for: primarily passive park and recreational uses; conservation of land, water, and other natural resources; historic or scenic purposes; visual relief; or landform preservation.	N/A
	Population-based Parks	None	Provides for areas designated for passive and/or active recreational uses, such as community parks and neighborhood parks. It will allow for facilities and services to meet the recreational needs for the community as defined by the community plan.	N/A
Residential[1]	Residential – Low	None	Provides for both single-family and multi-family housing within a low-density range.	5-9 du/ac
	Residential – Low Medium	None	Provides for both single-family and multi-family housing within a low-medium-density range.	10-14 du/ac
	Residential – Medium	None	Provides for both single-family and multi-family housing within a medium-density range.	15-29 du/ac
	Residential – Medium High	None	Provides for multi-family housing within a medium-high-density range.	30-44 du/ac
	Residential – High	None	Provides for multi-family housing within a high-density range.	45-74 du/ac
	Residential – Very High	None	Provides for multi-family housing in the highest density range.	75+ du/ac

Table 5-1
General Plan Land Use Categories

General Plan Land Use	Recommended Community Plan Designation	Use Considerations	Description	General Plan Density Range (du/ac[1])
Commercial Employment, Retail, and Services[1, 2, 3]	Neighborhood Commercial	Residential Permitted	Provides local convenience shopping, civic uses, and services serving an approximate three mile radius. Housing may be allowed only within a mixed-use setting.	0-44 du/ac
	Community Commercial	Residential Permitted	Provides for shopping areas with retail, service, civic, and office uses for the community at large within three to six miles. It can also be applied to Transit Corridors where multi-family residential uses could be added to enhance the viability of existing commercial uses.	0-74 du/ac
	Office Commercial	Residential Permitted	Provides for office employment uses with limited, complementary retail uses. Residential uses may occur only as part of a mixed-use (commercial/residential) project.	0-44 du/ac
Institutional and Public and Semi-Public Facilities[4]	Institutional	None	Provides a designation for uses that are identified as public or semi-public facilities in the community plan and which offer public and semi-public services to the community. Uses may include but are not limited to: airports, military facilities, community colleges, university campuses, landfills, communication and utilities, transit centers, water sanitation plants, schools, libraries, police and fire facilities, cemeteries, post offices, hospitals, park-and-ride lots, government offices, and civic centers.	N/A

[1]Residential density ranges will be further refined and specific in each community plan. Residential densities mal also be narrowed within the density ranges established for the Commercial Employment, Retail, and Services General Plan land use category in this table. Community plans may also establish density minimums where none are specified in the Commercial Employment, Retail, and Services General Plan land use category. Calculation of residential density is to be rounded to the nearest whole number if the calculation exceeds a whole number by 0.50 or more in most cases. In all other remaining instances, such as in the coastal areas, calculation of density is to be based on established policies and procedures. Whenever a plus (+) sign is identified next to a density number, the upper limit may be further specified in a community plan without causing the need for amending the General Plan, upon evaluation of impacts. For uses located within an airport influence area, the density ranges should be consistent with the Airport Land Use Compatibility Plan and Air Installation Compatible Use Zone study or steps should be taken to overrule the Airport Land Use Commission.
[2]Consult the Economic Prosperity Element for policies related to the commercial and industrial land use designations.
[3]Commercial land use designations may be combined to meet community objectives.
[4]Community plans will further define the specific institutional uses allowed on a particular site.

5.1.1.1 Land Use and Community Planning Element

The Land Use and Community Planning Element provides overarching policies to integrate the City of Villages strategy and guide the provision of public facilities while accommodating planned growth. Policies within this element, in combination with other elements, also ensure consistency with zoning regulations (e.g., SDMC).

The Land Use and Community Planning Element of the City's General Plan is largely seen as the structure and framework for developing community plans. When appropriate, policies call for community plans to further identify appropriate land uses to meet the goals set by the General Plan

and City of Villages strategy. The policies also indicate that mixed-use areas, villages, and community-specific policies are developed with public input and involvement.

The Land Use and Community Planning Element contains five goals related to community planning. These goals are to provide:

1. Community plans that are clearly established as essential components of the General Plan to provide focus upon community-specific issues.

2. Community plans that are structurally consistent yet diverse in their presentation and refinement of Citywide policies to address specific community goals.

3. Community plans that maintain or increase planned density of residential land uses in appropriate locations.

4. Community plan updates that are accompanied by updated IFS (formerly known as PFFPs).

5. Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.

Community plans are important because they contain specific policies that protect community character. Future public and private projects will be evaluated for consistency with policies in the community plans.

Environmental Protection/Environmental Justice. The General Plan Land Use and Community Planning Element also provides direction regarding balanced communities, equitable development, and environmental justice. The U.S Environmental Protection Agency (EPA) defines Environmental Justice as fair treatment and meaningful involvement of all peoples, regardless of race, color, national origin, or income, with respect to development, implementation and enforcement of environmental laws, regulations, and policies. The City of Villages strategy and emphasis on transit system improvements, transit-oriented development, and the Citywide prioritization and provision of public facilities in underserved neighborhoods is consistent with environmental justice goals.

5.1.1.2 Urban Design Element

The Urban Design Element of the General Plan includes goals and policies specific to mixed-use villages and commercial areas. The element emphasizes the integration of compatible land uses. In addition, this element anticipates the creation of transit- focused, walkable village centers, the provision of high-quality public spaces and civic architecture, and the enhancement of the visual quality of office and industrial development.

5.1.1.3 Economic Prosperity Element

The Economic Prosperity Element contains policies that are intended to improve the economic prosperity. This is accomplished by ensuring that the economy grows in ways that strengthen San Diego industries, retail and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in the community.

5.1.1.4 Noise Element

The focus of the Noise Element is to minimize excessive noise affects and improve the quality of life of people working and living in the City. The Noise Element identifies goals and related policies with regard to noise and land use compatibility, motor vehicle traffic noise, and trolley and train noise that are relevant to the community plan updates. While the Noise Element articulates the City's goals, the enforcement mechanism to control noise is the City's Noise Ordinance which is discussed in Section 5.6.

5.1.2 Land Development Code Regulations

Chapters 11 to 15 of the SDMC, are referred to as the Land Development Code (LDC), as they contain the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed within the city. The LDC contains Citywide base zones that specify permitted land use, density, floor-area ratio (FAR), and other development requirements for given zoning classifications, as well as overlay zones and supplemental regulations that provide additional development requirements.

Development of the proposed CPU areas is subject to the development regulations of the LDC. As part of the LDC, certain geographic areas of the City, known as Planned Districts, are governed by specific Planned District Ordinances (PDOs), as identified in Chapter 15 of the LDC. Planned district means any legally described geographic area: (1) which has historical significance or serves as an established neighborhood or community; or (2) which is at the time of adoption developing or substantially undeveloped and for which a program of phased growth is desirable; and (3) which has been designated a planned district by the City Council. The District shall be wholly within the boundaries of a precise plan or coterminous with the boundaries of a Community Plan. PDOs provide the means to adopt plans for certain areas of the City which provide land use, capital improvements and public facilities controls in lieu of conventional zoning to accomplish the following goals:

1. To preserve and enhance the cultural, aesthetic or economic value of neighborhoods having special importance due to their historical significance or because of their being part of older, established communities and neighborhoods; and

2. To systematically implement a comprehensive plan for the phased growth of developing and undeveloped areas of the City.

To implement the proposed CPUs, and included as part of the project analyzed within this PEIR, the City is proposing the deletion of existing zoning established by PDOs for each of the communities and applying Citywide zoning across both communities.

5.1.2.1 General Development Regulations

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all

aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14, General Regulations. Also included within the general regulations of Chapter 14 are the Environmentally Sensitive Land (ESL) Regulations, discussed below.

5.1.2.2 Environmentally Sensitive Lands Regulations

According to Section 143.0110 of the LDC, ESL Regulations apply to areas with any of the following: sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special Flood Hazard Areas. Development on a site containing environmentally sensitive lands requires a Site Development Permit in accordance with Section 125.0502 of the LDC. Future development on environmentally sensitive lands within the proposed CPU areas would be subject to the ESL Regulations because the planning area contains steep hillsides and sensitive biological resources.

5.1.2.3 Historical Resources Regulations

The purpose of the City's Historical Resources Regulations, found in Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources. The Historic Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual (LDM), as a condition of approval. If development cannot, to the maximum extent feasible, comply with the development regulations for historical resources, then a project would require a permit.

5.1.3 Multiple Species Conservation Program

The Multiple Species Conservation Program is discussed below in Section 5.8.

5.1.4 Airport Land Use Compatibility Plan

As discussed in Section 2.0, Environmental Setting, the airport nearest the CPU areas is San Diego International Airport (SDIA). The San Diego County Regional Airport Authority, serving as the Airport Land Use Commission, is required by state law to prepare an Airport Land Use Compatibility Plan (ALUCP) for the SDIA. The North Park and Golden Hill CPUs are within the Airport Influence Area (AIA) for SDIA. The AIA serves as the boundary for the ALUCP. The Airport Influence Area is divided into to two review areas. Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSSs). All policies and standards in the ALUCP apply within Review Area 1. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

The ALUCP contains policies and criteria that address land use compatibilities concerning noise and safety aspects of airport operations and land uses, heights of buildings, residential densities and residential intensities and the disclosure of aircraft overflight. The adopted ALUCP for SDIA contains policies that limit residential uses in areas experiencing noise above 60 dB CNEL by placing conditions on residential uses within the 60 decibels (dB) community noise equivalent level (CNEL) contour. Residential uses in such areas may require sound attenuation to reduce interior noise levels to 45 dB. Since the Airport Land Use Commission does not have land use authority, the City implements the compatibility plan through land use plans, development regulations, and zoning regulations.

5.2 Visual Effects and Neighborhood Character

5.2.1 California Scenic Highways Program

Recognizing the value of scenic areas and the value of views from roads in such areas, the California State Legislature established the California Scenic Highway Program in 1963. This legislation sees scenic highways as "a vital part of the all-encompassing effort...to protect and enhance California's beauty, amenity and quality of life." Under this program, a number of state highways have been designated as eligible for inclusion as scenic routes. Neither the North Park nor the Golden Hill communities contain an Officially Designated State Scenic Highway. The one-mile portion of State Route 163, known as the Cabrillo Freeway, between the north and south boundaries of Balboa Park, which is adjacent to both communities, is an Officially Designated State Scenic Highway.

5.2.2 City Of San Diego General Plan

The General Plan includes Citywide design goals and policies regarding visual elements that complement the goals for pedestrian-oriented and walkable villages from the City of Villages strategy. A village environment includes high-quality public spaces, civic architecture, and the enhancement of visual quality of all types of development.

The Urban Design Element of the General Plan establishes a set of design principles from which future physical design decisions can be based. Policies call for respecting San Diego’s natural topography and distinctive neighborhoods, providing public art, and encouraging the development of walkable, transit-oriented communities.

In its introduction, the Urban Design Element of the General Plan states:

> As the availability of vacant land becomes more limited, designing infill development and redevelopment that builds upon our existing communities becomes increasingly important. A compact, efficient, and environmentally sensitive pattern of development becomes increasingly important as the City continues to grow. In addition, future development should accommodate and support existing and planned transit service (City of San Diego 2008).

The General Plan Urban Design Element policies relevant to planning at the community plan level involve architectural and landscape elements, as well as the design of transit, parking, and residential. As part of community planning, this element also contains policies related to public spaces and cultural amenities that contribute to the character of each neighborhood.

5.3 Transportation and Circulation

This section summarizes existing regulations that apply to the transportation system. Sections 6.3 and 7.3 summarize the methodology and criteria for analysis for the project, respectively.

5.3.1 Federal Regulations

5.3.1.1 Department of Transportation Act of 1966

Section 4(f) of the Department of Transportation Act of 1966 specifies that a transportation project requiring the use of publicly owned parks, recreation areas, historic sites (including those owned privately), wildlife and waterfowl refuges, and many other types of resources can be approved only if there is no feasible and prudent alternate to using that land and if the project is planned to minimize harm to the property.

General procedures are as follows:

A specific finding is required. Section 4(f) lands may be used for federal aid highways only if:

- There is no prudent and feasible alternative to using that land; and
- The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

Each project proposal must include a Section 4(f) avoidance alternative (Caltrans 2011).

5.3.1.2 Surface Transportation Assistance Act (STAA)

In 1982, the federal government passed the STAA. This act requires states to allow larger trucks on the "national network," which is composed of the interstate system plus the non-interstate federal-aid primary system. "Larger trucks" includes (1) doubles with 28.5 foot trailers, (2) singles with 48-foot semi-trailers and unlimited kingpin-to-rear axle distance, (3) unlimited length for both vehicle combinations, and (4) widths up to 102 inches. Interstate 5 and State Route 78 are defined as STAA routes.

5.3.2 State Regulations

5.3.2.1 California Department of Transportation (Caltrans)

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities, but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects. In addition, Caltrans must review proposals to signalize any freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

5.3.2.2 California Transportation Commission (CTC)

The CTC consists of nine members appointed by the California Governor. CTC is responsible for the programming and allocating of funds for the construction of highway, passenger rail, and transit improvements throughout the state. CTC is responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

5.3.2.3 Assembly Bill 32

With Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the State of California committed itself to reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating the response to comply with AB 32.

In 2007, CARB adopted a list of early action programs that could be put in place by January 1, 2010. In 2008, CARB defined its 1990 baseline level of emissions, and by 2011 it completed its major rule making for reducing GHG emissions. Rules on emissions, as well as market-based mechanisms like the proposed cap and trade program, took effect in 2012.

On December 11, 2008, CARB adopted its Proposed Scoping Plan for AB 32. This scoping plan included the approval of Senate Bill (SB) 375 as the means for achieving regional transportation-related GHG targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the state comply with AB 32.

5.3.2.4 AB 1358 – California Complete Streets Act of 2008

Supporting some of the previously referenced regulations/requirements, the California Complete Streets Act of 2008 (AB 1358) requires circulation elements as of January 1, 2011, to accommodate the transportation system from a multi-modal perspective, including public transit, walking and biking, which have traditionally been marginalized in comparison to autos in contemporary American urban planning.

5.3.2.5 SB 375 - Sustainable Communities and Climate Protection Act

SB 375 has four key components. First, SB 375 requires regional GHG emissions targets. CARB's Regional Targets Advisory Committee will guide the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. For Carlsbad, the MPO is San Diego Association of Governments (SANDAG; see below). These targets, which MPOs may propose themselves, will be updated every eight years in conjunction with the revision schedule for housing and transportation elements.

Second, MPOs will be required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an alternative planning strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans (also prepared by SANDAG as the MPO for San Diego County) be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years.

Finally, MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the CTC. Regional transportation planning agencies (such as SANDAG) are encouraged, but not required, to use travel demand models consistent with the CTC guidelines.

The SANDAG region was the first region in the state that adopted a SCS and RTP update under SB 375.

5.3.3 Local Regulations

5.3.3.1 San Diego Forward: The ~~SANDAG~~ Regional ~~Transportation~~ Plan

SANDAG is the regional authority that creates regional-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. San Diego Forward: The Regional Plan (RP) combines two of the region's existing planning documents: The Regional Comprehensive Plan (RCP) and the RTP and SCS. The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The RCP covered eight policy areas, including urban form, transportation, housing, healthy environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the RP.~~The Regional Comprehensive Plan (RCP) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The RCP establishes a planning framework and implementation actions that increase the region's sustainability and encourage~~

~~"smart growth while preserving natural resources and limiting urban sprawl." The RCP encourages the regions and the County to increase residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. The focus is on implementation of basic smart growth principles designed to strengthen the integration of land use and transportation.~~

An April 24, 2015, SANDAG released the draft RP ~~Draft San Diego Forward: The Regional Plan~~ for public comment, with a closing date of July 15, 2015. The final RP was adopted by the SANDAG Board of Directors on October 9, 2015. ~~San Diego Forward: The Regional Plan is the update to the RCP. By combining and updating the region's two big picture planning documents – the RCP and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – into one, San Diego Forward.~~

5.3.3.2 SANDAG Regional Bike Plan

The San Diego Regional Bike Plan adopted by SANDAG supports implementation of the RP. It provides a regional strategy to make riding a bike a useful form of transportation for everyday travel. The plan will help San Diego meet its goals to reduce greenhouse gas emissions and improve mobility. Goals of the Regional Bike Plan include: increase levels of bicycling; improve bicycling safety; encourage complete streets; support reductions in emissions; and increase community support. In September 2013, the SANDAG Board of Directors approved funding to implement the Regional Bike Plan Early Action Program, which focuses on the region's highest priority projects. Priority is chosen in part based on proximity to smart growth areas, taking into account the fact that bikeways would be used more often if they connect high-density activity hubs within a short distance of each other, and on whether a project would fill key gaps in the regional bike networks.

5.3.3.~~2~~3 City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems, (ITS), Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

a. North Park Adopted Community Plan Mobility Element

The purpose of the adopted North Park Neighborhoods Community Plan Mobility Element is to establish goals and policies to guide future street network and design, street classification, Level of Service (LOS), transit facilities and service, pedestrian and bicycle accommodations, and facility improvements needed to support future travel needs within the Community Plan area. This element would be replaced by the Mobility Element of the CPU if adopted.

b. Golden Hill Adopted Community Plan Mobility Element

The purpose of the adopted Golden Hill Community Plan Mobility Element is to establish goals and policies to guide future street network and design, street classification, LOS, transit facilities and service, pedestrian and bicycle accommodations, and facility improvements needed to support future travel needs within the Community Plan area. This element would be replaced by the Mobility Element of the CPU if adopted.

c. City of San Diego Bicycle Master Plan (Update December 2013)

The City's Bicycle Master Plan Update (City of San Diego 2013) provides a framework for making cycling a more practical and convenient transportation option for a wider variety of San Diegans with varying riding purposes and skill-levels. The plan update evaluates and builds on the 2002 Bicycle Master Plan so that it reflects changes in bicycle user needs and changes to the City's bicycle network and overall infrastructure.

5.4 Air Quality

Motor vehicles are San Diego County's leading source of air pollution. In addition to these sources, other mobile sources include construction equipment, trains, and airplanes. Emission standards for mobile sources are established by state and federal agencies, such as the CARB and the U.S. EPA. Reducing mobile source emissions requires the technological improvement of existing mobile sources and the examination of future mobile sources, such as those associated with new or modification projects (e.g., retrofitting older vehicles with cleaner emission technologies). The State of California has developed statewide programs to encourage cleaner cars and cleaner fuels. Since 1996, smog-forming emissions from motor vehicles have been reduced by 15 percent, and the cancer risk from exposure to motor vehicle air toxics has been reduced by 40 percent. The regulatory framework described below details the federal and state agencies that are in charge of monitoring and controlling mobile source air pollutants and the measures currently being taken to achieve and maintain healthful air quality in the San Diego Air Basin (SDAB).

In addition to mobile sources, stationary sources also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources of air pollution are regulated by the local air pollution control or management district, in this case the San Diego Air Pollution Control District (APCD).

The State of California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. If an air basin is not in either federal or state attainment for a particular pollutant, the basin is classified as a moderate, serious, severe, or extreme non-attainment area for that pollutant (there is also a marginal classification for federal non-attainment areas). Once a non- attainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a ten-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the Clean Air Act. Areas that are redesignated to attainment are called maintenance areas.

5.4.1 Federal Regulations

Ambient Air Quality Standards represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 USC 7409], the U.S. EPA developed primary and secondary national ambient air quality standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead (Pb), and respirable particulate matter (PM_{10} and $PM_{2.5}$). The primary NAAQS "…in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health…" and the secondary standards "…protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 USC 7409(b)(2)]. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 5-2.

Table 5-2
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone[8]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
Respirable Particulate Matter (PM_{10})[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m^3)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		–	–	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m^3)	–	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[10]	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[10]	–	
Lead[12,13]	30 Day Average	1.5 µg/m^3	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m^3		
Visibility Reducing Particles[14]	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chroma-tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chroma-tography			

See footnotes on next page.

Table 5-2
Ambient Air Quality Standards

ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; – = not applicable.

[1] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

[3] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[4] Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

[5] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[6] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[7] Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

[8] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[9] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standards of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

[12] The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[13] The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

[14] In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

SOURCE: CARB 2015a.

5.4.1.1 Ozone (O_3)

In 1997, the U.S. EPA promulgated a new 8-hour ozone standard of eight parts per hundred million (pphm) to replace the existing 1-hour standard of 12 pphm. On June 15, 2004, that portion of the SDAB containing the CPU areas was designated a "basic" non-attainment area for the 1997 8-hour ozone standard under Subpart 1 of Part D of the CAA. Per the U.S. EPA's final Phase 1 rule for

implementing the 1997 8-hour ozone standard, the 1-hour ozone standard was to be revoked "in full, including the associated designations and classifications, one year following the effective date of the designations for the 8-hour NAAQS [for ozone]" (69 Federal Register 23951). As such, the 1-hour ozone standard was revoked in the SDAB on June 15, 2005. Requirements for transitioning from the 1-hour to 8-hour ozone standard are described in the final rule.

However, because of subsequent litigation concerning the Phase 1 implementation rule, the provisions of the 1997 8-hour ozone standard Phase 1 implementation rule that placed 8- hour ozone non-attainment areas under Subpart 1, Part D, Title I of the CAA instead of Subpart 2 were vacated. Consequently, on January 16, 2009, it was proposed that the SDAB be classified as "moderate" non-attainment for the 1997 8-hour ozone standard under Subpart 2. Under Subpart 2, consistent with Section 182 of the CAA, the period of attainment for areas designated as moderate non-attainment will be no more than six years from the effective date of designation. Because the effective date of designation for the 1997 8-hour ozone standard was June 15, 2004, attainment of the 1997 8-hour ozone standard for the SDAB was to occur by June 15, 2010. To date this has not occurred.

On March 12, 2008, the U.S. EPA revised the 8-hour ozone standard to 7.5 pphm. On March 12, 2009, CARB submitted its recommendations for area designations for the revised Federal 2008 8-hour ozone standard. The recommendations were based on ozone measurements collected during 2006 through 2008. It was recommended that the SDAB be classified as non-attainment for the revised standard. The U.S. EPA was required to issue final area designations no later than March 2010. However, there was insufficient information to make these designations and the U.S. EPA extended the deadline to March 2011. California must then submit a State Implementation Plan (SIP) outlining how the state will meet the 2008 standards by a date that U.S. EPA will establish in a separate rule. That date will be no later than three years after U.S. EPA's final designations. The deadline for attaining the standard may vary based on the severity of the problem in the area.

Criticism of the standards proposed in March 2008 resulted in the reconsideration of those standards by the U.S. EPA. On January 16, 2010, the U.S. EPA again proposed revision of the 8-hour ozone standards. The U.S. EPA proposed to set the primary standard at a level ranging between 6 and 7 pphm. The U.S. EPA also proposed establishing a distinct cumulative, seasonal "secondary" standard, designed to protect sensitive vegetation and ecosystems, including forests, parks, wildlife refuges and wilderness areas. The U.S. EPA proposed to set the secondary standard at a level within the range of 7 to 15 parts per million-hours (ppm-hours), which is a measurement unit used to express the sum of weighted hourly ozone concentrations, combined over the 12-hour daylight period.

The U.S. EPA was to issue final standards by August 31, 2010, but to date this has not occurred. Rather, on December 8, 2010, the U.S. EPA Administrator asked the Clean Air Scientific Advisory Committee (CASAC) for further interpretation of the epidemiological and clinical studies used to make their recommendation. On January 26, 2011, the U.S. EPA provided "charge questions" to the CASAC regarding the reconsideration of the 2008 ozone standards. The U.S. EPA reviewed the additional input CASAC provided and set the final 8- hour ozone standard to 0.070 parts per million (ppm) in July 2011. On September 2, 2011, the U.S. EPA was directed to withdraw the draft ozone

NAAQS. Therefore, the U.S. EPA will continue to implement the standards set during the previous administration while the ongoing five-year review of the updated science continues.

The SDAB has recently attained the 1997 ozone standard and CARB is now in the process of filing a petition to the U.S. EPA to redesignate the region.

5.4.1.2 PM_{10} and $PM_{2.5}$

The SDAB is unclassified for the Federal PM_{10} standard and classified as an attainment area for the federal $PM_{2.5}$ standard. On September 21, 2006, the U.S. EPA revised the NAAQS for particulate matter. The 25-hour $PM_{2.5}$ standard was strengthened from 65 micrograms per cubic meter ($\mu g/m^3$) to 35 $\mu g/m^3$. The existing standard for annual $PM_{2.5}$ of 15 $\mu g/m^3$ remained the same. The SDAB is classified as an attainment area for the new federal 25-hour $PM_{2.5}$ standard.

The U.S. EPA also revised the standard for PM_{10}. Due to a lack of evidence linking health problems to long-term exposure to coarse particle pollution, the agency revoked the annual PM_{10} standard (effective December 17, 2006), retaining only the existing 25-hour standard.

5.4.1.3 Sulfur Dioxide (SO_2)

In June 2010, the U.S. EPA established a new 1-hour SO_2 standard, effective August 23, 2010. The revised standards were based on the three-year average of the annual 99th percentile of 1-hour daily maximum concentrations. The U.S. EPA also revoked both the existing 25-hour SO_2 standard of 0.14 ppm and the annual primary SO_2 standard of 0.030 ppm, effective August 23, 2010. The secondary SO_2 standard was not revised at that time, but is undergoing a separate review by the U.S. EPA. In June 2012, it was recommended that all California counties be designated as in attainment for the new standard. Areas designated as in attainment were required to submit maintenance plans by June 2013.

5.4.1.4 Nitrogen Dioxide (NO_2)

All areas of the state, including the SDAB, are either unclassified or in attainment of the Federal NO_2 standards. In January 2010, the U.S. EPA strengthened the 1-hour NO_2 standard to 100 parts per billion (ppb) based on the three-year average of the 98th percentile of the annual distribution of daily maximum 1-hour average concentrations. The annual NO_2 standard of 53 ppb remained unchanged. In January 2012, the U.S. EPA determined that no area in the country was violating the 2010 standards. To determine compliance with the standard, the new NO_2 rule also establishes a new ambient air monitoring network and reporting requirements. Once the expanded network of NO_2 monitors is fully deployed and three years of air quality data have been collected, U.S. EPA intends to redesignate areas in 2016 or 2017, as appropriate, based on the air quality data from the new monitoring network.

5.4.1.5 Lead (Pb)

The SDAB is an attainment area for the federal Pb standard. In 2008, the EPA revised the primary standard for lead Pb from 1.5 $\mu g/m^3$ to 0.15 $\mu g/m^3$ over a rolling three-month period, and revised

the secondary standard to be identical to the primary standard. The 1978 lead Pb NAAQS will be retained until one year after designations for the new standards, except in current non-attainment areas. The SDAB is in attainment of the 1978 Pb NAAQS. On November 8, 2011, the U.S. EPA provided designations for the revised lead standards. The SDAB is classified as unclassifiable/in attainment.

5.4.1.6 Carbon Monoxide (CO)

The CAA requires that the U.S. EPA review the standards every five years. On August 31, 2011, the U.S. EPA finalized review of the CO standards and concluded that the existing standards would be retained (76 Federal Register 54294). All areas of California are either unclassifiable or in attainment (maintenance) for CO standards. The SDAB is a federal maintenance area for CO.

5.4.2 State Regulations

5.4.2.1 Criteria Pollutants

The U.S. EPA allows states the option to develop different (stricter) standards. The State of California has developed the California Ambient Air Quality Standards (CAAQS) and generally has set more stringent limits on the criteria pollutants (see Table 5-2). In addition to the Federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (see Table 5-2). The California CAA, also known as the Sher Bill or California AB 2595, was signed into law on September 30, 1988, and became effective on January 1, 1989. The California CAA requires that districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures. The California CAA also requires that a district must:

1. Demonstrate the overall effectiveness of the air quality program;

2. Reduce non-attainment pollutants at a rate of five percent per year, or include all feasible measures and expeditious adoption schedule;

3. Ensure no net increase in emissions from new or modified stationary sources;

4. Reduce population exposure to severe non-attainment pollutants according to a prescribed schedule;

5. Include any other feasible controls that can be implemented, or for which implementation can begin, within ten years of adoption of the most recent air quality plan; and

6. Rank control measures by cost-effectiveness. The SDAB is a non-attainment area for the State O_3 standards, the State PM_{10} standard, and the State $PM_{2.5}$ standard.

5.4.2.1 Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (AB 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California SB 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air monitoring network, and develop any additional air toxic control measures needed to protect children's health. Locally, toxic air pollutants are regulated through the San Diego APCD's Regulation XII.

Of particular concern statewide are diesel-exhaust particulate matter (DPM) emissions. DPM was established as a TAC in 1998 and is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants program. Diesel emissions generated within the CPU areas pose a potential hazard to residents and visitors.

Following the identification of diesel particulate matter as a TAC in 1998, CARB has worked on developing strategies and regulations aimed at reducing the risk from diesel particulate matter. The overall strategy for achieving these reductions is found in the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles* (State of California 2000). A stated goal of the plan is to reduce the cancer risk statewide arising from exposure to diesel particulate matter 85 percent by 2020.

5.4.2.1 State Implementation Plan

State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the

Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. The CARB then forwards SIP revisions to the U.S. EPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in the Code of Federal Regulations (CFR) at 40 CFR 52.220.

The San Diego APCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The San Diego APCD adopts rules, regulations, and programs to attain State and federal air quality standards, and appropriates money (including permit fees) to achieve these objectives.

5.4.2.1 The California Environmental Quality Act

Section 15125(d) of the California Environmental Quality Act (CEQA) Guidelines requires discussion of any inconsistencies between the proposed project and applicable general plans and regional plans, including the applicable air quality attainment or maintenance plan (or SIP).

5.4.2.1 Regional Air Quality Strategy

The San Diego APCD prepared the 1991/1992 Regional Air Quality Strategy (RAQS) in response to the requirements set forth in AB 2595. The draft was adopted, with amendments, on June 30, 1992 (County of San Diego 1992). Attached, as part of the RAQS, are the Transportation Control Measures (TCMs) for the air quality plan prepared by the SANDAG in accordance with AB 2595 and adopted by SANDAG on March 27, 1992, as Resolution Number 92-49 and Addendum. The required triennial updates of the RAQS and corresponding TCMs were adopted in 1995, 1998, 2001, 2004, and 2009. An update is currently being prepared based on the revised 8-hour ozone standard. The RAQS and TCMs set forth the steps needed to accomplish attainment of the CAAQS.

5.5 Greenhouse Gas Emissions

In response to rising concern associated with increasing GHG emissions and global climate change impacts, several plans and regulations have been adopted at the national, state, and local levels with the aim of reducing GHG emissions. Important federal, state, and local plans and regulations are summarized below.

5.5.1 Federal

5.5.1.1 Federal Clean Air Act

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that carbon dioxide (CO_2) is an air pollutant, as defined under the CAA, and that the U.S. EPA has the authority to regulate emissions of GHGs. The U.S. EPA announced that GHGs (including CO_2, methane [CH_4], nitrous oxide [N_2O], hydrofluorocarbons [HFC], perfluorocarbons [PFC], and sulfur hexafluoride [SF_6]) threaten the public health and welfare of the American people. This action was a prerequisite to finalizing the U.S. EPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the U.S. EPA and the United States Department of Transportation's National

Highway Traffic Safety Administration (NHTSA). The standards were established on April 1, 2010 for 2012 through 2016 model year vehicles and on October 15, 2012 for 2017 through 2025 model year vehicles (U.S. EPA 2011; U.S. EPA and NHTSA 2012).

5.5.1.2 Climate Change Action Plan

Adopted in 1993, the U.S. Climate Change Action Plan (CCAP) consists of voluntary actions to reduce all significant GHGs from all economic sectors. Backed by federal funding, the CCAP supports cooperative partnerships between the government and the private sector in establishing flexible and cost-effective ways to reduce GHG emissions. The CCAP encourages investments in new technologies, but also relies on previous actions and programs focused on saving energy, reducing transportation emissions, improving forestry management, and reducing waste. With respect to energy and transportation-related GHG emissions reductions, the CCAP includes the following:

1. Energy Demand Actions to accelerate the use of existing energy saving technologies and encourage the development of more advanced technologies. Commercial actions focus on installing efficient heating and cooling systems in commercial buildings and upgrading to energy-efficient lighting systems (the Green Lights program). The State Buildings Energy Incentive Fund provides funding to states for the development of public building energy management programs. Residential actions focus on developing new residential energy standards and building codes and providing money-saving energy efficient options to homeowners.

2. Energy Supply Actions to reduce emissions from energy supply. These actions focus on increasing the use of natural gas, which emits less CO_2 than coal or oil, and investing in renewable energy sources, such as solar and wind power, which result in zero net CO_2 emissions. Energy supply strategies also focus on reducing the amount of energy lost during distribution from power plants to consumers.

3. Transportation Actions to reduce transportation-related emissions are focused on investing in cleaner fuels and more efficient technologies, and reducing vehicle miles traveled (VMT). In addition, the U.S. EPA and Department of Transportation (U.S. DOT) are to draft guidance documents for reducing VMTs for use in developing local clean air programs.

5.5.1.3 Fuel Economy Standards

The U.S. EPA and the Department of Transportation's NHTSA have been working together on developing a national program of regulations to reduce GHG emissions, and to improve fuel economy of light-duty vehicles. The U.S. EPA is finalizing the first-ever national GHG emissions standards under the CAA, and the NHTSA is finalizing Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. On April 1, 2010, the U.S. EPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 250 grams per mile by 2016, decreasing to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is

equivalent to 35.5 miles per gallon (mpg), and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will be made through improvements in air conditioning leakage and the use of alternative refrigerants that would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined U.S. EPA GHG standards and NHTSA CAFE standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other states that have adopted the California standards (U.S. EPA 2011; U.S. EPA and NHTSA 2012).

5.5.2 State

The State of California has adopted a number of plans and regulations aimed at identifying statewide and regional GHG emissions caps, GHG emissions reduction targets, and actions and timelines to achieve the target GHG reductions.

5.5.2.1 Executive Order S-3-05 – Statewide GHG Emission Targets

This executive order (EO), signed on June 1, 2005, established the following GHG emission reduction targets for the state of California:

- by 2010, reduce GHG emissions to 2000 levels;
- by 2020 reduce GHG emissions to 1990 levels;
- by 2050 reduce GHG emissions to 80 percent below 1990 levels.

This EO also directs the secretary of the California EPA (California EPA) to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. With regard to impacts, the report shall also prepare and report on mitigation and adaptation plans to combat the impacts. The first Climate Action Team Assessment Report was produced in March 2006 and has been updated every two years.

5.5.2.2 Executive Order B-30-15 – 2030 Statewide GHG Emission Goal

This executive order (EO), issued by Governor Brown on April 29, 2015, established an interim GHG emission reduction goal for the state of California: by 2030, reduce GHG emissions to 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal as well as the pre-existing long-term 2050 goal identified in EO S- 3-05 (see discussion above). Additionally, this EO directed CARB to update its AB 32 (Nuñez) mandated Scoping Plan (see discussion above) to address the 2030 goal. Therefore, in the coming months, CARB is expected to develop statewide inventory projection data for 2030 as well as commence its efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the EO's new interim goal.

5.5.2.3 AB 32 – California Global Warming Solutions Act

In response to Executive Order S-3-05, the California legislature passed AB 32, the California Global Warming Solutions Act of 2006, which was signed on September 27, 2006. It requires the CARB to adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. The CARB is also required to publish a list of discrete GHG emission reduction measures. As required by AB 32, CARB has established a statewide GHG emissions cap for 2020, and adopted reporting rules for large industrial sources and a Climate Change Scoping Plan (Scoping Plan).

5.5.2.4 Climate Change Scoping Plan

As directed by AB 32, the Scoping Plan prepared by CARB in December 2008 includes measures to reduce statewide GHG emissions to 1990 levels by 2020. These reductions are what CARB identified as necessary to reduce forecasted "Business As Usual" (BAU) 2020 emissions. CARB will update the Scoping Plan at least once every five years to allow evaluation of progress made and to correct the Scoping Plan's course where necessary.

The 2008 Scoping Plan estimated annual BAU 2020 emissions to reach 596 Million metric tons of CO_2 equivalent (MMT CO_2E). Thus, to achieve 1990 emissions levels of 427 MMT CO_2E, a 169 MMT CO_2E reduction was thus determined to be needed by 2020. The majority of reductions are directed at the sectors with the largest GHG emissions contributions— transportation and electricity generation—and involve statutory mandates affecting vehicle or fuel manufacture, public transit, and public utilities. The CARB list of reductions is included in the technical GHG analysis in Appendix E. The Scoping Plan also lists several other recommended measures that will contribute toward achieving the 2020 statewide reduction goal, but whose reductions are not (for various reasons, including the potential for double counting) additive with the measures listed in Table 8 of Appendix E. These include state and local government operations. The Scoping Plan reduction measures and complementary regulations are described further in the following sections, and are grouped under the two headings of Transportation-related Measures and Non-Transportation-Related Measures as representative of the sectors to which they apply.

Approved in May 2014, the First Update to the Scoping Plan defines CARB's priorities for the next five years and sets the groundwork to reach long-term goals set forth in EO S-3-05. The First Update describes advancements in climate science such as the quantification of the impacts of temperature change, further understanding of the mechanisms of climate pollutants (black carbon, methane, and hydrofluorocarbons), and improvements to GHG monitoring. The First Update also describes progress made since the original Scoping Plan including implementation of a more comprehensive Cap-and-Trade Program, the Low Carbon Fuel Standard (LCFS), a 33 percent Renewable Portfolio Standard, and an Advanced Clean Cars program that has been adopted at the Federal level.

5.5.2.4 AB 1493 – Vehicular Emissions of Greenhouse Gases

AB 1493 (Pavley) directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light-duty trucks to the maximum extent technologically feasible, beginning with the 2009 Model Year. CARB has adopted amendments to its regulations that would enforce AB 1493 but provide vehicle manufacturers with new compliance flexibility. Pavley standards are

currently divided into two phases. Standards that regulate vehicles model years 2009 through 2016 are termed "Pavley I", standards for Model Years 2017 through 2025 were originally termed "Pavley II".

With these actions, it is expected that Pavley I will reduce GHG emissions from California passenger vehicles by a total of 31.5 MMT CO_2E counted toward the total pre- economic downturn statewide reduction target on the capped sector of 146.7 MMT CO_2E (CARB Scoping Plan). CARB adopted a second phase of the Pavley regulations, termed "Pavley II," which are now called the Low Emission Vehicle III (LEV III) Standards. LEV III covers Model Years 2017 to 2025. These reductions are to come from improved vehicle technologies such as small engines with superchargers, continuously variable transmissions, and hybrid electric drives.

5.5.2.5 Executive Order S-01-07 – Low Carbon Fuel Standard

This executive order directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least ten percent by 2020 through a LCFS. CARB adopted the LCFS as a discrete early action measure pursuant to AB 32 in April 2009 and includes it as a reduction measure in its Scoping Plan.

The LCFS is a performance standard with flexible compliance mechanisms intended to incentivize the development of a diverse set of clean, low-carbon transportation fuel options. Its aim is to accelerate the availability and diversity of low-carbon fuels such as biofuels, electricity, and hydrogen, by taking into consideration the full life cycle of GHG emissions. A ten-percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 16.5 $MMTCO_2E$ in 2020. However, in order to account for possible overlap of benefits between LCFS and the Pavley GHG standards, CARB has discounted the contribution of LCFS to 15 MMT CO_2E.

5.5.2.6 Senate Bill 375—Regional Emissions Targets

The SB 375 was signed in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan measure described above. Its purpose is to align regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation to reduce GHG emissions by promoting high-density, mixed-use developments around mass transit hubs.

The Scoping Plan prepared pursuant to AB 32 by CARB in 2008 and updated in 2014 identifies reduction targets for all sources of GHG emissions in the state. While the transportation sector is responsible for the greatest GHG reductions (nearly 30 percent of the total reductions), most of these reductions will come from higher fuel-efficiency vehicles per the Pavley standards (18 percent) and a more diverse fuel mix per the low carbon fuel standards (9 percent). Statewide, RTPs prepared by metropolitan planning organizations, such as SANDAG, are responsible for less than 3 percent of the GHG reductions. SB 375 is the mechanism that establishes GHG emission reduction targets for each regional agency.

SANDAG's SB 375 target is to reduce GHG emissions from cars and light trucks by 7 percent, per capita, by 2020, and by 13 percent by 2035, using a 2005 baseline. The RP, encompassing both the

RTP and SCS, shows that the region will exceed these targets by pursuing the following strategies: using land in ways to make developments more compact, conserving open space, and investing in a transportation system that provides people with alternatives to driving alone. ~~The CARB, in consultation with the MPOs, was required to provide each affected region with passenger vehicle GHG emissions reduction targets for 2020 and 2035 by September 30, 2010. The SANDAG is the San Diego region's MPO. On August 9, 2010 CARB released the staff report on the proposed reduction target, which was subsequently approved by CARB on September 23, 2010. The San Diego region will be required to reduce GHG emissions from cars and light trucks seven percent per capita by 2020 and 13 percent by 2035. The reduction targets are to be updated every eight years, but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets.~~

~~Once reduction targets are established, each of California's MPOs must prepare and adopt a SCS that demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in the SCS. After the SCS is adopted by the MPO, the SCS will be incorporated into that region's federally enforceable RTP. San Diego's MPO, SANDAG, completed and adopted its 2050 RTP in October 2011, the first such plan in the state that included a SCS.~~

~~CARB is also required to review each final SCS to determine whether it would, if implemented, achieve the GHG emission reduction target for its region. If the combination of measures in the SCS will not meet the region's target, the MPO must prepare a separate Alternative Planning Strategy (APS) to meet the target. The APS is not a part of the RTP.~~

5.5.2.7 Million Solar Roofs Program

The Million Solar Roofs Program was created by SB 1 in 2006 and includes the California Public Utilities Commission's (CPUC's) California Solar Initiative and California Energy Commission's (CEC's) New Solar Homes Partnership. It requires publicly owned utilities to adopt, implement, and finance solar-incentive programs to lower the cost of solar systems and help achieve the goal of installing 3,000 megawatts (MW) of new solar capacity by 2020. The Million Solar Roofs Program is one of CARB's GHG reduction measures identified in the 2008 Scoping Plan. Achievement of the program's goal is expected to equate to a reduction of 2.1 MMT CO_2E in 2020 statewide BAU emissions.

5.5.2.8 California Energy Code

The California Code of Regulations, Title 24, Part 6 is the California Energy Code. This code, originally enacted in 1978 in response to legislative mandates, establishes energy- efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. The most recent amendments to the Energy Code, known as 2013 Title 24, or the 2013 Energy Code, became effective July 1, 2015. The 2013 Title 24 requires energy use reductions of 25 to 30 percent above the former 2008 Title 24 Energy Code. By reducing California's energy consumption, emissions of statewide GHGs may also be reduced.

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency given selection of various heating, ventilation, and air-conditioning (HVAC); sealing; glazing; insulation; and other components related to the building envelope. Title 24 governs energy consumed by the built environment by the major building envelope systems such as space heating, space cooling, water heating, some aspects of the fixed lighting system, and ventilation. Non-building energy use, or plug-in energy use (such as appliances, equipment, electronics, plug-in lighting), are independent of building design and are not subject to Title 25.

5.5.2.9 California Green Building Standards

California Code of Regulations, Title 24, Part 11 are the California Green Building Standards. Beginning in 2011, California Green Building Standards Code (CalGreen) instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CalGreen with amendments for stricter requirements.

The mandatory standards require:

- 20 percent mandatory reduction in indoor water use relative to specified baseline levels;
- 50 percent construction/demolition waste diverted from landfills;
- mandatory inspections of energy systems to ensure optimal working efficiency; and
- requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards.

The voluntary standards require:

- Tier I – 15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, ten percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof; and
- Tier II – 30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent recycled content, 30 percent permeable paving, 30 percent cement reduction, cool/solar reflective roof.

Similar to the compliance reporting procedure described above for demonstrating code compliance under Title 24, Part 6, in new buildings and major renovations, compliance with the CalGreen water reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. The water use compliance forms must

demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CalGreen or a reduced per-plumbing-fixture water use rate.

The CARB Scoping Plan includes a Green Building Strategy with the goal of expanding the use of green building practices to reduce the carbon footprint of new and existing buildings. Consistent with CalGreen, the Scoping Plan recognized that GHG reductions would be achieved through buildings that exceed minimum energy-efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Green building is thus a vehicle to achieve the Scoping Plan's statewide electricity and natural gas efficiency targets, and lower GHG emissions from waste and water transport sectors.

In the Scoping Plan, CARB projects that an additional 26.3 MMT CO_2E could be reduced through expanded green building standards. However, this reduction is not counted toward the BAU 2020 reduction goal to avoid any double counting, as most of these reductions are accounted for in the electricity, waste, and water sectors. Because of this, CARB has assigned all emissions reductions that occur because of green building strategies to other sectors for meeting AB 32 requirements, but will continue to evaluate and refine the emissions from this sector.

5.5.2.9 Senate Bill 97—CEQA GHG Amendments

SB 97 (Dutton), passed by the legislature and signed on August 24, 2007, required the Office of Planning and Research on or before July 1, 2009 to prepare, develop, and transmit to the Resources Agency amendments to the CEQA guidelines (Guidelines) to assist public agencies in the evaluation and mitigation of GHGs or the effects of GHGs as required under CEQA, including the effects associated with transportation and energy consumption. SB 97 required the Resources Agency to certify and adopt those guidelines by January 1, 2010. Proposed amendments to the state CEQA Guidelines for GHG emissions were submitted on April 13, 2009, adopted on December 30, 2009, and became effective March 18, 2010.

Section 15065.4 of the amended Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

(a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15065. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

    1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or

    2) Rely on a qualitative analysis or performance-based standards.

While the amendments require calculation of a project's contribution, they clearly do not establish a standard by which to judge a significant effect or a means to establish such a standard.

5.5.3 Local

5.5.3.1 San Diego Association of Government's Regional Plan

The RP prepared and adopted by SANDAG in 2015 is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The RP establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The RP encourages the regions and the County to increase residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. The focus is on implementation of basic smart growth principles designed to strengthen the integration of land use and transportation. General urban form goals, policies, and objectives are summarized as follows:

- Mix compatible uses.
- Take advantage of compact building design.
- Create a range of housing opportunities and choices.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Preserve open space, natural beauty, and critical environmental areas.
- Strengthen and direct development towards existing communities.
- Provide a variety of transportation choices.
- Make development decisions predictable, fair, and cost-effective.
- Encourage community and stakeholder collaboration in development decisions.

The RP also addresses border issues, providing an important guideline for communities that have borders with Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

5.5.3.2 2008 San Diego General Plan

The City General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation

measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

One specific concept introduced in the General Plan is the City of Villages Strategy, which proposes growth to be directed into pedestrian-friendly mixed-use activity centers linked to an improved regional transit system. The City of Villages Strategy shifts the focus of land use policies to encourage infill development and reinvest in existing communities. Locating different land uses types near one another can decrease mobile emissions. Thus, the development of dense urban "villages" would generate less GHG emissions. The City of Villages Strategy can be seen as an effort to avoid what is commonly referred to as "urban sprawl".

Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the PEIR for the General Plan. A PEIR Mitigation Framework was included that indicated that "for each future project requiring mitigation (measures that go beyond what is required by existing programs, plans, and regulations), project-specific measures will [need to] be identified with the goal of reducing incremental project-level impacts to less than significant; or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists".

5.5.3.3 Climate Action Plan

In December 2015, the City adopted its Climate Action Plan (CAP). The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a BAU projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 MMT CO_2E in 2020 and 16.7 MMT CO_2E in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO_2E in 2020 and 6.5 MMT CO_2E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMT CO_2E by 2020 and 205,462 MTCO_2E by 2035.

5.6 Noise

5.6.1 State

5.6.1.1 California Code of Regulations

Title 24, Chapter 12, Section 1207, of the California Building Code (CBC) requires that interior noise levels, attributable to exterior sources, not exceed to 45 dB CNEL in any habitable room within a residential structure, other than single-family. A habitable room in a building is used for living, sleeping, eating or cooking; bathrooms, closets, hallways, utility spaces, and similar areas are not

considered habitable spaces. An acoustical study is required for proposed multiple-unit residential and hotel/motel structures within areas where the noise contours exceeds 60 dB CNEL. The studies must demonstrate that the design of the building will reduce interior noise to 45 dB CNEL or lower in inhabitable rooms. If compliance requires windows to be inoperable or closed, the structure must include ventilation or air-conditioning (24 California Code of Regulations [CCR] 1207 2010).

Title 24, Chapter 11 of CalGreen provides mandatory measures for residential and non-residential buildings. Section 5.507, Environmental Comfort, addresses interior noise control in non-residential buildings. This section provides the minimum Sound Transmission Class and Outdoor–Indoor Sound Transmission Class for wall, roof–ceiling assemblies, and windows for buildings located within the 65 A-weighted decibels (dB(A)) CNEL contour of an airport, freeway, expressway, railroad, industrial source, or fixed guideway source as determined by the Noise Element of the General Plan. As indicated, buildings shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly average equivalent level of 50 dB(A) Leq. Exterior features such as sound walls or earth berms may be utilized as appropriate to the building, addition, or alteration project to mitigate sound migration to the interior. An acoustical analysis documenting complying interior sound levels shall be prepared by personnel approved by the architect or engineer of record.

Interior noise levels for dwellings other than detached single-family dwellings are regulated by Title 24 of the California Code of Regulations, California Noise Insulation Standards. This includes multi-family and hotel/motel structures. Title 24, Chapter 12, Section 1207, of the California Building Code requires that interior noise levels, attributable to exterior sources, not exceed 45 dB(A) CNEL in any habitable room within a residential structure. A habitable room in a building is used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable spaces. Acoustical studies must be prepared for proposed residential structures located where the noise level exceeds 60 dB(A) CNEL. The studies must demonstrate that the design of the building would reduce interior noise to 45 dB(A) CNEL in inhabitable rooms. If compliance requires windows to be inoperable or closed, the structure must include ventilation or air conditioning.

5.6.2 Local

5.6.2.1 City of San Diego General Plan

a. Exterior Noise

The City specifies compatibility standards for different categories of land use in the Noise Element of the General Plan. Table 5-3 provides the allowable noise levels by land use as identified in the City's General Plan (City of San Diego 2015).

As shown, the "compatible" noise level for noise sensitive receptors, including single- and multi-family residential, is 60 CNEL. Compatibility indicates that standard construction methods will attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.

Exterior noise levels ranging between 65 and 70 CNEL are considered “conditionally compatible” for multiple units, mixed-use commercial/residential, live work, and group living accommodations. The Noise Element also states (Section B, Motor Vehicle Traffic Noise) that although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL with a requirement to include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL where a community plan allows multi-family and mixed-use.

For single-family units, mobile homes, and senior housing, exterior noise levels ranging between 60 and 65 dB(A) CNEL are considered “conditionally compatible.” Conditionally compatible uses are permissible, provided interior noise levels will not exceed 45 dB(A) CNEL. Therefore, projects sited on land that falls into the “conditionally compatible” noise environment require an acoustical study.

Table 5-3
City of San Diego Land Use - Noise Compatibility Guidelines
(Table NE-3)

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
		60	65	70	75
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units *For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.		45	45*		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12Educational Facilities; Libraries; Museums;; Child Care Facilities		45			
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities		45	45		
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					
Wholesale, Distribution, Storage Use Category					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					
Research & Development				50	

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Source: City of San Diego, General Plan Amendment to the Noise Element 2015.

Park uses are considered compatible in areas up to 70 dB(A) CNEL and conditionally compatible in areas between 70 and 75 dB(A) CNEL.

b. Interior Noise

Noise-sensitive residential/habitable interior spaces have an interior standard of 45 CNEL, as stated in the City's 2011 Significance Determination Thresholds and the California Noise Insulation Standards. The Significance Determination Thresholds indicate that for multi-family development, exterior noise levels would be considered significant if future projected traffic would result in noise levels exceeding 65 dB(A) CNEL at exterior usable areas or interior noise levels exceeding 45 dB(A) CNEL.

The City assumes that standard construction techniques will provide a 15 dB reduction of exterior noise levels to an interior receiver. Given this assumption, standard building construction could be assumed to result in interior noise levels of 45 dB CNEL or less when exterior noise sources are 60 dB(A) CNEL or less. When exterior noise levels are greater than 60 dB(A) CNEL, consideration of specific non-standard building construction techniques is required.

Proposed new construction and major renovations must demonstrate compliance with the current interior noise standards through submission and approval of a Title 24 Compliance Report.. In the case of ministerial projects for single family, there is no procedure to ensure that noise is adequately attenuated outside of the Airport Influence Area.

c. Policies

The General Plan Noise Element contains the following policies regarding the preparation of acoustical studies and interior noise guidelines:

NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.

NE-I.1. Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibly Plans.

NE-I.2. Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.

NE-E.5. Implement night and daytime on-site noise level limits to address noise generated by commercial uses where it affects abutting residential and other noise-sensitive uses.

5.6.2.2 Noise Abatement and Control Ordinance

Section 59.5.0101 et seq. of the City Municipal Code, the Noise Abatement and Control Ordinance, regulates the sources of disturbing, excessive, or offensive noises within the City limits. Sound level limits are established for various types of land uses and are measured in one-hour averages. The 1-hour, A-weighted equivalent sound level, Leq(1), is the energy average of the A-weighted sound levels occurring during a 1-hour period. The Ordinance states that it is unlawful for any person to cause noise by any means to the extent that the 1–hour average sound level exceeds the applicable limit given for that land use. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Table 5-4, shows the exterior noise limits specified in the City's Noise Control Ordinance.

Construction noise is regulated by Section 59.5.0404 of the City Municipal Code, that states:

- 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…

- . . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity 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 12hour period from 7:00 A.M. to 7:00 P.M.

Table 5-4
San Diego Property Line Noise Level Limits

Receiving Land Use Category	Noise Level [dB(A)]		
	7:00 A.M. to 7:00 P.M.	7:00 P.M. to 10:00 P.M.	10:00 P.M. to 7:00 A.M.
Single-family Residential	50	45	40
Multi-family Residential (up to a maximum density of 1 dwelling unit/2,000 square feet)	55	50	45
All Other Residential	60	55	50
Commercial	65	60	60
Industrial or Agricultural	75	75	75
SOURCE: City of San Diego Municipal Code Section 59.5.0401			

5.6.2.3 Airport Land Use Compatibility Plan

As discussed in Section 5.1.4, the San Diego County Regional Airport Authority, prepared an ALUCP for the SDIA. The Golden Hill area CPU is within the Review Area 1 AIA for SDIA. The AIA serves as the boundary for the ALUCP. In addition to the policies and criteria addressing land use compatibilities, including building heights and densities, the ALUCP contains policies and criteria concerning noise. The adopted ALUCP for SDIA contains policies that place conditions on residential uses at and above

the 60 dB CNEL contour (Review Area 1). In the Golden Hill CPU area, the 60 to 70 dB CNEL contours includes residential land uses located also within the southern portions of the CPU. Table 5-5 provides the allowable noise levels by land use.

Table 5-5
Airport Noise Compatibility Criteria

Land Use Category [a]	Exterior Noise Exposure (CNEL)			
Note: Multiple categories may apply to a project	60-65	65-70	70-75	75+
Residential				
Single-family, Multi-family	45	45[1]	45[1,2]	45[1,2]
Single Room Occupancy (SRO) Facility	45	45[1]	45[1,2]	45[1,2]
Group Quarters	45	45[1]	45[1,2]	45[1,2]
Commercial, Office, Service, Transient Lodging				
Hotel, Motel, Resort	45/50	45/50	45/50	45/50
Office – Medical, Financial, Professional Services, Civic			50	50
Retail (e.g., Convenience Market, Drug Store, Pet Store)			50	50
Service – Low Intensity (e.g., Gas Station, Auto Repair, Car Wash)			50	50
Service – Medium Intensity (e.g., Check-cashing, Veterinary Clinics, Kennels, Personal Services)			50	50
Service – High Intensity (e.g., Eating, Drinking Establishment, Funeral Chapel, Mortuary)			50	50
Sport/Fitness Facility			50	50
Theater – Movie/Live Performance/Dinner		45	45	45
Educational, Institutional, Public Services				
Assembly – Adult (Religious, Fraternal, Other)	45	45[1]	45[1]	45[1]
Assembly – Children (Instructional Studios, Cultural Heritage Schools, Religious, other)	45			
Cemetery				
Child Day Care Center/Pre-K				
Convention Center				
Fire and Police Stations			50	50
Jail, Prison		45/50	45/50	45/50
Library, Museum, Gallery		45	45	45
Medical Care – Congregate Care Facility, Nursing and Convalescent Home	45			
Medical Care – Hospital	45			
Medical Care – Out-Patient Surgery Centers	45			
Schools for Adults – College, University, Vocational/Trade School	45	45[1]	45[1]	
Schools– Kindergarten through Grade 12 (includes Charter Schools)	45			
Industrial				
Junkyard, Dump, Recycling Center, Construction Yard				
Manufacturing/Processing – General				
Manufacturing/Processing of Biomedical Agents, Biosafety Levels 3 and 4 Only				
Manufacturing/Processing of Hazardous Materials [4]				
Mining/Extractive Industry				
Research and Development – Scientific, Technical				
Sanitary Landfill				
Self-Storage Facility				
Warehousing/Storage – General				
Warehousing/Storage of Biomedical Agents, Biosafety Levels 3 and 4 Only				
Warehousing/Storage of Hazardous Materials [4]				

Table 5-5
Airport Noise Compatibility Criteria

Land Use Category [a] Note: Multiple categories may apply to a project	Exterior Noise Exposure (CNEL)			
	60-65	65-70	70-75	75+
Transportation, Communication, Utilities				
Auto Parking				
Electrical Power Generation Plant				
Electrical Substation				
Emergency Communications Facilities				
Marine Cargo Terminal				
Marine Passenger Terminal				
Transit Center, Bus/Rail Station				
Transportation, Communication, Utilities – General				
Truck Terminal				
Water, Wastewater Treatment Plant				
Recreation, Park, Open Space				
Arena, Stadium				
Golf Course				
Golf Course Clubhouse				
Marina				
Park, Open Space, Recreation				
Agriculture				
Aquaculture				
Agriculture				

	Compatible: Use is permitted.
	Conditionally Compatible: Use is permitted subject to stated conditions.
	Incompatible: Use is not permitted under any circumstances.
45	Indoor uses: building must be capable of attenuating exterior noise to 45 CNEL
50	Indoor uses: building must be capable of attenuating exterior noise to 50 CNEL
45/50	Sleeping rooms must be attenuated to 45 CNEL any other indoor areas must be attenuated to 50 CNEL
1	Avigation easement must be dedicated to the Airport owner/operator.
2	New residential use is permitted above 70 CNEL contour only if current General/Community Plan designation allows for residential use. General/Community Plan amendments from a nonresidential designation to a residential designation are not permitted.
3	Refer to Appendix A of the San Diego International Airport Land Compatiblity Plan for definition of Assembly – Children.
4	Refer to Appendix A of the San Diego International Airport Land Compatiblity Plan for definitions of manufacturing, processing and storage of hazardous materials.
a	Land uses not specifically listed shall be evaluated, as determined by Airport Land Use Commission, using the critiera for similar uses. Refer to Appendix A of the San Diego International Airport Land Compatiblity Plan.
b	If this land use would occur within a single- or multi-family residence, it must be evaluated using the criteria for single- or multi-family residential.

SOURCE: San Diego County Regional Airport Authority 2014.

5.7 Historical Resources

Federal, state, and local criteria have been established for the determination of historical resource significance. The criteria for determining a resource's significance generally focus on a resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State or local criteria.

5.7.1 Federal

5.7.1.1 National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for their significance at the local, State, or Federal level. Listing on the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) on the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing on the NRHP.

Criteria for listing on the NRHP are stated in Title 36, Part 60 of the Code of Federal Regulations (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

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

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the State CEQA Guidelines (Section 15065.5), as well.

5.3.1.2 Native American Involvement

Native American involvement in the development review process is addressed by several federal and state laws. The most notable of these are the California Native American Graves Protection and Repatriation Act (2001) and the federal Native American Graves Protection and Repatriation Act (1990). These acts ensure that Native American human remains and cultural items be treated with respect and dignity. In addition, SB 18 details requirements for local agencies to consult with identified California Native American Tribes during the development process.

At the local level, Policy HP-A.5.e of the Historic Preservation Element in the General Plan states that Native American monitors should be included during all phases of the investigation of archaeological resources. This would include surveys, testing, evaluations, data recovery phases, and construction monitoring.

5.7.2 State

5.7.2.1 California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one that qualifies for the California Register of Historic Resources (CRHR) or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5025.1(g) of the Public Resources Code. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic resources, or is not deemed significant in an historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (State CEQA Guidelines Section 15065.5) for the registration of significant architectural, archaeological, and historical resources on the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a “unique” resource, based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Having a special and particular quality such as being the oldest or best available example of its type.
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

5.7.2.2 California Register of Historic Resources (Public Resources Code Section 5020 et seq.)

Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

5.7.2.3 Native American Burials (Public Resources Code Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

5.7.3 Local

5.7.3.1 City of San Diego Municipal Code: Historical Resources Regulations

In January 2000, the City's Historical Resources Regulations (Regulations), part of the SDMC (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201-143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners. The Regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use.

Historic Resources Guidelines are incorporated in the San Diego LDC by reference. These Guidelines set up a Development Review Process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

Compliance with the Historical Resources Regulations begins with the determination of the need for a site- specific survey for a project. Section 143.0212(b) of the Regulations requires that historical

resource sensitivity maps be used to identify properties in the City that have a probability of containing archaeological sites. These maps are based on records maintained by the South Coastal Information Center of the California Historic Resources Information System and San Diego Museum of Man, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a one-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey can be required on a project if the properties are over 45 years old and appear to have integrity of setting, design, materials, workmanship, feeling, and association.

Section 143.0212(d) of the Regulations states that if a property-specific survey is required, it shall be conducted according to the Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

5.7.3.2 Historical Resources Register

As compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego 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 National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing on the State Register of Historical 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.

5.7.3.2 General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the Historical Resources Board (HRB), the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

City General Plan Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans, such as the proposed CPUs being analyzed within this PEIR. These policies also focus on coordinated planning and preservation of tribal resources, promoting the relationship with Kumeyaay/Diegueño tribes. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through cultural heritage tourism.

5.8 Biological Resources

5.8.1 Federal

5.8.1.1 Endangered Species Act

The federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.), provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed animal species. The ESA also prohibits all persons subject to U.S. jurisdiction from "taking" endangered species, which includes any harm or harassment. Section 7 of the ESA requires that federal agencies, prior to project approval, consult the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service to ensure adequate protection of listed species that may be affected by the project.

5.8.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The list of bird species covered by the MBTA is extensive and is detailed in 50 CFR 10.13. The regulatory definition of "migratory bird" is broad and includes any mutation or hybrid of a listed species, including any part, egg, or nest of such a bird (50 CFR 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under the ESA. The MBTA, which is enforced by the USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory

bird or attempt such actions, except as permitted by regulation. The applicable regulations prohibit the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11).

5.8.1.3 Clean Water Act

The federal Water Pollution Control Act (also known as the Clean Water Act) (33 U.S.C. 1251 et seq.), as amended by the Water Quality Act of 1987 (PL 1000-4), is the major federal legislation governing water quality. The purpose of the Clean Water Act is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Discharges into waters of the United States are regulated under Section 404. Waters of the United States include (1) all navigable waters (including all waters subject to the ebb and flow of tides); (2) all interstate waters and wetlands; (3) all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, or natural ponds; (4) all impoundments of waters mentioned above; (5) all tributaries to waters mentioned above; (6) the territorial seas; and (7) all wetlands adjacent to waters mentioned above. In California, the State Water Resources Control Board and the nine Regional Water Quality Control Boards are responsible for implementing the Clean Water Act. Important applicable sections of the Clean Water Act are discussed below:

- Section 303 requires states to develop water quality standards for inland surface and ocean waters and submit to the U.S. Environmental Protection Agency for approval. Under Section 303(d), the state is required to list waters that do not meet water quality standards and to develop action plans, called total maximum daily loads, to improve water quality.

- Section 304 provides for water quality standards, criteria, and guidelines.

- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the Clean Water Act. Certification is provided by the respective Regional Water Quality Control Board.

- Section 402 establishes the National Pollutant Discharge Elimination System, a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the United States. The National Pollutant Discharge Elimination System program is administered by the Regional Water Quality Control Board. Conformance with Section 402 is typically addressed in conjunction with water quality certification under Section 401.

- Section 404 provides for issuance of dredge/fill permits by the U.S. Army Corps of Engineers (ACOE). Permits typically include conditions to minimize impacts on water quality. Common conditions include ACOE review and approval of sediment quality analysis before dredging, a detailed pre- and post-construction monitoring plan that includes disposal site monitoring, and required compensation for loss of waters of the United States.

5.8.1.4 U.S. Army Corps of Engineers

The ACOE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area. In this regard, the ACOE acts under two statutory authorities, the Rivers and Harbors Act (33 U.S.C., Sections 9 and 10), which governs specified activities in navigable waters, and the Clean Water Act (Section 404), which governs specified activities in waters of the United States, including wetlands and special aquatic sites. Wetlands and non-wetland waters (e.g., rivers, streams, and natural ponds) are a subset of waters of the United States and receive protection under Section 404 of the Clean Water Act. The ACOE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area under statutory authority of the Clean Water Act (Section 404). In addition, the regulations and policies of various federal agencies mandate that the filling of wetlands be avoided to the maximum extent feasible. The ACOE requires obtaining a permit if a project proposes placing structures within navigable waters and/or alteration of waters of the United States.

5.8.2 State

5.8.2.1 California Endangered Species Act

Similar to the federal ESA, the California ESA of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code, Section 2050 et seq.). The California ESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

5.8.2.2 California Fish and Game Code

The California Fish and Game Code regulates the handling and management of the state's fish and wildlife. Most of the code is administered or enforced by the California Department of Fish and Wildlife (CDFW; before January 1, 2013, California Department of Fish and Game (CDFG)). One section of the code generally applies to public infrastructure projects:

- Section 1602 regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources.

5.8.2.3 Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act of 1969, updated in 2012 (California Water Code, Section 13000 et seq.), established the principal California legal and regulatory framework for water quality control. The act is embodied in the California Water Code. The California Water Code authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the federal Clean

Water Act. The state of California is divided into nine regions governed by the Regional Water Quality Control Board (RWQCB). The RWQCBs implement and enforce provisions of the California Water Code and Clean Water Act under the oversight of the SWRCB.

5.8.3 Local

5.8.3.1 Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement (IA) with USFWS and CDFW. The IA serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and subarea plan. The agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

a. Multi-Habitat Planning Area

The Multi-Habitat Planning Area (MHPA) is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]".

Private land wholly within the MHPA is allowed only up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.5.2 of the Final MSCP Plan. All MHPA boundary line adjustments require approval by the Wildlife Agencies and the City.

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to

sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biological Guidelines.

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.

b. MHPA Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The MHPA adjacency guidelines are intended to be incorporated into the Mitigation Monitoring and Reporting Program and/or applicable permits during the development review phase of a proposed project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/ development.

c. MSCP Subarea Plan: Overall Management Policies and Directives for Urban Habitat Areas

The CPU communities are part of the Urban Habitat Areas of the MHPA. The MSCP plan describes the Urban Habitat Areas of the MHPA and its vision as a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability. Management directives to achieve this vision are provided in the MSCP. The general MHPA guidelines and management directives are presented below.

d. MSCP Subarea Plan: General MHPA Guidelines and Management Directives

The City's general MHPA Guidelines as described in Section 1.2.3 of the City's Subarea Plan include no specific guidelines that apply to the CPU areas.

With regards to specific management directives the major issues that require consideration for management in the community plan areas include the following, in order of priority, as excerpted from Section 1.5.7 of the City of San Diego MSCP Subarea Plan:

- Intense land uses and activities adjacent to and in covered species habitat;
- Dumping, litter, and vandalism;
- Itinerant living quarters;
- Utility, facility and road repair, construction, and maintenance activities;
- Exotic (non-native), invasive plants and animals;
- Urban runoff and water quality.

5.8.3.2 City of San Diego Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations is to "protect, preserve, and, where damaged restore, the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. These regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resources conservation principles and the rights of private property owners". ESL Regulations cover sensitive biological resources, including wetlands, within and outside of the coastal zone and MHPA. Future development proposed in accordance with the CPUs would be required to comply with all applicable ESL regulations.

5.8.3.3 City of San Diego General Plan Policies

The City of San Diego General Plan establishes Citywide policies to be cited in conjunction with a community plan. The General Plan presents goals and policies for biological resources in the Conservation Element.

5.9 Geologic Conditions

5.9.1 Earthquake Fault Zoning Act (Alquist-Priolo Act)

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the Act, the State Geologist has established regulatory zones (known as Earthquake Fault Zones) around surface traces of active faults. These have been mapped for affected cities, including San Diego. Application for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report prepared by a geologist registered in the State of California, which is directed to the problem of potential surface fault displacement through a project site.

5.9.2 City of San Diego Seismic Safety Study (SDSSS)

The San Diego Seismic Safety Study includes geologic hazards and fault maps of the City. Areas of the City are identified by geologic hazard category, which reflect the geologic hazard type and related risks. These are generalized maps and site-specific geologic/ geotechnical investigations may be necessary for proposed development or construction. Land Development Code Section 145.1803 describes when a geotechnical investigation is required and City of San Diego Development Services Information Bulletin 515 describes the minimum submittal requirements for geotechnical and geological reports that may be required for development permits, subdivision approvals or grading permits.

5.9.3 City of San Diego General Plan Policies

The City's General Plan presents goals and policies for geologic and soil safety in the Public Facilities, Services, and Safety Element. Relevant excerpts from this element are included below.

Policy PF-Q.1. Protect public health and safety through the application of effective seismic, geologic and structural considerations.

a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action.

b. Maintain updated Citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses.

c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.

d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.

e. Coordinate with other jurisdictions to establish and maintain a geologic "data bank" for the San Diego area.

f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability.

g. Adhere to state laws pertaining to seismic and geologic hazards.

Policy PF-Q.2. Maintain or improve integrity of structures to protect residents and preserve communities.

- Abate structures that present seismic or structural hazards with consideration of the desirability of preserving historical and unique structures and their architectural appendages, special geologic and soils hazards, and the socio- economic consequences of the attendant relocation and housing programs.

- Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.

- Support legislation that would empower local governing bodies to require structural inspections for all existing pre-Riley Act (1933) buildings, and any necessary remedial work to be completed within a reasonable time.

5.10 Paleontological Resources

Under California law, paleontological resources are protected by CEQA; the CCR, Title 14, Division 3, Chapter 1, Sections 4307 and 4309; and Public Resources Code Section 5097.5. Pursuant to Section 15065 of the CEQA Guidelines (CCR Sections 15000–15387), a lead agency must find that a project would have a significant effect on the environment when the project has the potential to eliminate important examples of the major periods of California prehistory, including significant paleontological resources. The City's Paleontological Guidelines (July 2002) and Significance Determination Thresholds (January 2011) are used to make this determination. Sections 6.10 and 7.10 summarize the methodology and criteria for analysis for the project, respectively.

5.11 Hydrology/Water Quality

There are Federal, State, and local regulations that impose requirements on new development for erosion control, control of runoff contaminants, and control of direct discharge of pollutants that impact water quality. These laws, regulations, and standards are summarized below.

5.11.1 Federal

5.11.1.1 Clean Water Act

The Clean Water Act (33 U.S.C. §1251 et seq.) (1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The Clean Water Act established basic guidelines for regulating discharges of pollutants into the waters of the U.S. and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the Clean Water Act.

Section 401 of the Clean Water Act requires that any applicant for a Federal permit to conduct any activity, including the construction or operation of a facility which may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into Waters of the U.S. In California, the SWRCB and RWQCBs administer the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects or recommendations contained within the Plans include the SWRCB Construction General Permit and Industrial General Permit and the regional Municipal Separate Storm Sewer System (MS4) Permit administered by the RWQCB.

Under section 303(d) of the Clean Water Act, states, territories, and authorized tribes are required to develop lists of impaired waters. These are waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop Total Maximum Daily Loads for these waters. A Total Maximum Daily Load is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

5.11.1.2 Executive Order 11988, Floodplain Management

The major requirements of this Federal order are to avoid support of floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program. The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and directing of development to less flood-prone areas.

5.11.2 State

5.11.2.1 California Department of Fish and Wildlife Code – Streambed Alteration Program

CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement is required for a project that would impact CDFW jurisdictional resources. The Agreement with CDFW typically requires mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or combination of all three forms.

5.11.2.2 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal Clean Water Act.

The State of California is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the Clean Water Act under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers, other surface waters and groundwater basins, and establish water quality objectives for those waters.

5.11.2.3 San Diego Regional Water Quality Control Board (Water Board) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, NPDES Permit No. CAS0109266

Under the authority of the Clean Water Act amendments and Federal NPDES Permit regulations, the Water Board issued this order to the Copermittees consisting of San Diego County, the 18 cities within San Diego County, the Port of San Diego, and the San Diego Regional Airport Authority. This order requires that all jurisdictions within the San Diego region prepare Jurisdictional ~~Urban~~ Runoff Management Plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development. The subsequent amendments expanded coverage to portions of Orange County and Riverside County within the San Diego Region (Region 9) and made other modifications.

5.11.3 Local

5.11.3.1 Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major Hydrologic Units, 54 Hydrologic Areas, and 147 Hydrologic Sub Areas, extending from Laguna Beach southerly to the U.S./Mexico border. Drainage from higher elevations in the east flow to the west, ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

5.11.3.2 City of San Diego Jurisdictional Runoff Management Program

This document is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays and the ocean in the region in compliance with the Water Board permit referenced above. The document describes how the City incorporates storm water best management practices into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

5.11.3.3 Water Quality Improvement Plans

The MS4 Permit also requires development of Water Quality Improvement Plans (WQIPs) that guide the Copermittees' jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The WQIPs further the Clean Water Act's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and

management process that identifies the highest priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions.

5.11.3.4 Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the SDMC outlines Storm Water Runoff and Drainage Regulations which apply to all development in the City, regardless of whether or not a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides a guide for designing drainage, and drainage-related facilities for developments within the City.

5.11.3.5 Storm Water Standards Manual

The City's current Storm Water Standards Manual provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual include:

1. Low Impact Develop (LID) Best Management Practice (BMP) Requirements
2. Source Control BMPs
3. BMPs Applicable to Individual Priority Development Project Categories
4. Treatment Control BMPs

Although the footprint of the LID BMPs can often be fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features. The Storm Water Standards Manual also addresses "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations. Future development projects proposed within areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location. Projects discharging into underground storm drains discharging directly to bays or the ocean are exempt. Downstream drainage systems from the proposed CPU areas are hardened to San Diego Bay and/or are tidally influenced, and therefore are not susceptible to erosion from increases in storm water runoff discharge rates and durations. Projects within the CPU areas draining to San Diego River would be required to comply with hydromodification management requirements.

The Storm Water Standards Manual also provides minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and provides minimum performance standards, including: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and preserve natural hydraulic features and

riparian buffers where possible. The City's Storm Water Standards Manual was updated in 2016 for consistency with the Regional Best Management Practices (BMP) Design Manual.

5.11.3.6 City of San Diego General Plan

The City's General Plan presents goals and policies for storm water infrastructure in the Public Facilities, Services, and Safety Element, and presents goals and policies for open space (including floodplain management) and urban runoff management in the Conservation Element.

5.12 Public Services and Facilities

The City requires payment of Development Impact Fees (DIF) to collect a proportional fair-share cost of capital improvements needed to offset the impact of the development (City of San Diego Municipal Code Section 142.0640). DIF fees are based on community specific financing plans completed when community plans are updated. Financing plans were formerly known as Public Facilities Financing Plans (PFFP) and are now referred to as Impact Fee Studies (IFS).

The General Plan Public Facilities Element includes a number of policies that address financing of public facilities and specifies that IFS should be completed concurrent with preparation of Community Plan updates, should set community-level priorities for facility financing, and ensure new development pays its proportional fair-share of public facilities costs through payment of DIFs. Facility types that are eligible for DIF funding include transportation, storm drains, parks and recreation, fire-rescue, police, and libraries.

5.12.1 Police

As specified in the City General Plan, Public Facilities Element, Policy PF-E.2, the City goal is to maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within seven minutes.
- Priority 1 Calls (serious crimes in progress) within 12 minutes.
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes.
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes.
- Priority 4 Calls (minor requests for police service) within 90 minutes.

5.12.2 Parks

The General Plan provides standards for population –based parks and Recreation Facilities which include Recreation Centers and Aquatic Complexes. The standard for population-based parks is 2.8 useable acres per 1,000 residents, which can be achieved through a combination of neighborhood and community parks and park equivalencies. The standard for Recreation Center is a minimum of 17,000 square feet per recreation center or a population of 25,000. The standard for Aquatic Complex is one per 50,000 people or within approximately six miles.

5.12.3 Fire

The Fire-Rescue Department has an active program that promotes the clearing of canyon vegetation away from structures in accordance with Section 142.0412 of the San Diego Municipal Code and the San Diego Fire-Rescue Department's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on city property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the San Diego Fire-Rescue Department (per SDMC Section 142.0412(i) or a previously recorded entitlement requires a width more or less than the standard 100 feet. Other fire prevention measures include adopting safety codes and an aggressive brush management program. Citywide fire service goals, policies and standards are located in the Public Facilities, Services, and Safety Element of the General Plan and the Fire-Rescue Services Department's Fire Service Standards of Response Coverage Deployment Study.

Response time standards are provided in the General Plan Public Facilities, Services and Safety Element and summarized below:

a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to one-minute dispatch time, 1.5 minutes company turnout time and five minutes drive time in the most populated areas.

b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.

    - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.

    - This equates to 1-minnute dispatch time, 1.5 minutes company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas.

To direct fire station location timing and crew size planning as the community grows, fire unit deployment performance measures are established based on population density zones and are shown in Table 5-6, below:

Table 5-6 Deployment Measures to Address Future Growth by Population Density per Square Mile				
	Structure Fire Urban Area	Structure Fire Rural Area	Structure Fire Remote Area	Wildfires Populated Areas
	>1,000-people/ sq. mi.	1,000 to 500 people/sq. mi.	500 to 50 people/sq. mi. *	Permanent open space areas
1st Due Travel Time	5	12	20	10
Total Reflex Time	7.5	14.5	22.5	12.5
1st Alarm Travel Time	8	16	24	15
1st Alarm Total Reflex	10.5	18.5	26.5	17.5
Notes: Reflect time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units SOURCE: City of San Diego General Plan 2008.				

The following population based performance measures are used to plan for needed facilities. Where more than one square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregates into a population "cluster," these measures guide the determination of response time measures (Table 5-7) and the need for fire stations:

Table 5-7 Deployment Measures to Address Future Growth by Population Clusters		
Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	> 200,000 people	4 minutes
Urban-Suburban	< 200,000 people	5 minutes
Rural	500 - 1,000 people	12 minutes
Remote	< 500	> 15 minutes
SOURCE: City of San Diego General Plan 2008.		

5.13 Public Utilities

5.13.1 Water Supply

SB 610 requires water suppliers to prepare a Water Supply Assessment (WSA) report for inclusion by land use agencies during the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential development of more than 500 units, shopping centers or businesses employing more than 1,000 people, shopping centers or businesses having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 people, and/or commercial buildings having more than 250,000 square feet of floor space or occupying

more than 40 acres of land. SB 221 and SB 610 went into effect January 2002 with the intention of linking water supply availability to land use planning by cities and counties.

5.13.2 Wastewater

Council Policy 400-13 identifies the need to provide maintenance access to all sewers in order to reduce the potential for spills. The policy requires that environmental impacts from access paths in environmentally sensitive areas should be minimized to the maximum extent possible through the use of sensitive access path design, canyon-proficient maintenance vehicles, and preparation of plans that dictate routine maintenance and emergency access procedures.

Council Policy 400-14 outlines a program to evaluate the potential to redirect sewage flow out of canyons and environmentally sensitive areas to an existing or proposed sewer facility located in City streets or other accessible locations. The policy includes an evaluation procedure that requires both a physical evaluation and a cost-benefit analysis. Based on the analysis, if redirection of flow outside the canyon is found to be infeasible, a Long-Term Maintenance and Emergency Access Plan is required. The plan would be specific to the canyon evaluated, and would prescribe long term access locations for routine maintenance and emergency repairs along with standard operating procedures identifying cleaning methods and inspection frequency.

The City's Sewer Design Guide sets forth criteria to be used for the design of sewer systems which may consist of pump stations, gravity sewers, force mains, and related appurtenances. It includes criteria for determining capacity and sizing of pump stations, gravity sewers and force mains, alignment of gravity sewers and force mains, estimating wastewater flow rates, design of bridge crossings, and corrosion control requirements.

5.13.3 Water Distribution

The City's Water Facility Design Guidelines identify general planning, predesign, and design details and approaches to be use for water infrastructure. The guidelines provide uniformity in key concepts, equipment types, and construction materials on facilities built under the Water CIP. These design Guidelines assist in providing professionally sound, efficient, uniform, and workable facilities; whether pipelines, pressure control facilities, pumping stations, or storage facilities.

5.13.4 Communication Facilities

City Council Policy 600-43 established a set of comprehensive guidelines for the review and processing of applications for the placement and design of Wireless Communication Facilities in accordance with the City of San Diego land use regulations. These guidelines are intended to prescribe clear, reasonable, and predictable criteria to assess and process applications in a consistent and expeditious manner, while reducing visual and land use impacts associated with Wireless Communication Facilities. For applicants seeking placement of a Wireless Communication Facility on city-owned land, this policy should be used in conjunction with applicable Council Policies and Land Development Code section 141.0420.

5.13.5 Solid Waste

The California Legislature passed AB 939 to address landfill capacity and solid waste concerns in 1989. The Integrated Waste Management Act mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. The law also required local governments to prepare Source Reduction and Recycling Elements detailing how these reductions would be achieved. In 2011, the State enacted AB 341 which established a policy goal for California of 75 percent recycling, composting, or source reduction of solid waste by 2020. In July 2012, the City updated the Recycling Ordinance to lower the exemption threshold for required recycling, thereby requiring all privately serviced businesses, commercial/institutional facilities, apartments, and condominiums generating four or more cubic yards of trash per week to recycle. The City is currently at a 67 percent diversion rate (City of San Diego 2015h). Pursuant to the City's Significance Determination Thresholds, any land development project that may generate approximately 60 tons of waste or more during construction and/or operation is required to prepare a project-specific Waste Management Plan (WMP) to address disposal of waste generated during shot-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals.

5.14 Health and Safety

Hazardous materials and hazardous wastes are extensively regulated by federal, state, local regulations, with the major objective of protecting public health and the environment. In general, these regulations provide definitions of hazardous substances; identify responsible parties; establish reporting requirements; set guidelines for handling, storage, transport, remediation, and disposal of hazardous materials and wastes; and require health and safety provisions for both workers and the public, such as emergency response and worker training programs. The major regulations relevant to the CPU are summarized below.

5.14.1 Federal

5.14.1.1 Environmental Protection Agency

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for clean up

when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List, which is a list of contaminated sites warranting further investigation by the U.S. EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

5.14.1.2 United States Department of Transportation

Transportation of chemicals and hazardous materials are governed by the U.S. Department of Transportation, which stipulates the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways.

5.14.1.3 Federal Emergency Management Agency

The primary mission of the Federal Emergency Management Agency is to reduce the loss of life and property and to protect the nation from all hazards, including natural disasters, acts of terrorism, and other man-made disasters, by leading and supporting a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation.

5.14.1.4 Disaster Mitigation Act

The Disaster Mitigation Act of 2000 requires a state mitigation plan as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Disaster Mitigation Act also established a new requirement for local mitigation plans.

5.14.1.5 Emergency Planning and Community Right-To-Know Act

The Emergency Planning Community Right-to-Know Act (EPCRA) of 1986 was included under the Superfund Amendments and Reauthorization Act (SARA) law and is commonly referred to as SARA Title III. EPCRA was passed in response to concerns regarding the environmental and safety hazards proposed by the storage and handling of toxic chemicals. EPCRA establishes requirements for federal, state, and local governments, Indian Tribes, and industry regarding emergency planning and Community Right-to-know reporting on hazardous and toxic chemicals. SARA Title III requires states and local emergency planning groups to develop community emergency response plans for protection from a list of Extremely Hazardous Substances (40 CFR Appendix B). The Community Right-to-Know provisions help increase the public’s knowledge of and access to information on chemicals at individual facilities, their uses, and their release into the environment.

5.14.1.6 Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act (HMTA) of 1975 was created to provide adequate protection from the risks to life and property related to the transportation of hazardous materials in commerce by improving regulatory enforcement authority of the Secretary of Transportation.

5.14.2 State

5.14.2.1 California Code of Regulations Title 22

The CCR Title 22 provides the following definition of hazardous materials:

> A hazardous material is a substance or combination of substances which, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either (1) cause or significantly contribute to an increase in mortality or an increase in serious, irreversible or incapacitating irreversible illness; or (2) pose a substantial present or potential hazard to human health and safety, or the environment when improperly treated, stored, transported or disposed of. Hazardous materials include waste that has been abandoned, discarded, or recycled on the property and as a result represents a continuing hazard as the development is proposed. Hazardous materials also include any contaminated soil or groundwater.

Title 22 also provides standards applicable to generators and transporters or hazardous wastes, as well as standards for operators or hazardous waste transfer facilities, among other regulations.

5.14.2.2 California Environmental Protection Agency

The management of hazardous materials and waste within California is under the jurisdiction of the California EPA, which was created by the State of California to establish a cabinet-level voice for the protection of human health and the environment and to assure the coordinated deployment of state resources.

5.14.2.3 Hazardous Materials Release Response Plans and Inventory

Two programs in the California Health and Safety Code (H&SC) Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Releases (CalARP) program. The County of San Diego Department of Environmental Health (DEH) is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazards substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulations. Congress requires EPA Region 9 to make RMP information available to the public through the EPA's Envirofacts Data Warehouse. The Envirofacts Data Warehouse is considered the single point of access to select EPA environmental

data. California H&SC Section 25270, Aboveground Petroleum Storage Act requires registration and spill prevention programs for above ground storage tanks that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs that are implemented by the RWQCBs and the SWRCB.

5.14.2.4 Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous material incidents is one part of this plan. The plan is managed by the California Emergency Management Agency, which coordinates the responses of other agencies, including California EPA, the California Highway Patrol, CDFW, and RWQCB.

5.14.2.5 Office of Environmental Health Hazard Assessment

The State of California Office of Environmental Health Hazard Assessment oversees implementation of many public health-related environmental regulatory programs within California EPA, including implementing the provisions of the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65). Proposition 65 requires the governor to publish, at least annually, a list of chemicals known to the state to cause cancer or reproductive toxicity. The proposition was intended to protect California citizens and the state's drinking water sources from chemicals known to cause cancer, birth defects, or other reproductive harm and to inform citizens about exposures to such chemicals.

5.14.2.6 California Department of Toxic Substances Control

Within California EPA, the California Department of Toxic Substances Control (DTSC) has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the state agency, for the management of hazardous materials and the generation, transport and disposal of hazardous waste under the authority of the Hazardous Waste Control Law. Since August 1, 1992, the DTSC has been authorized to implement the state's hazardous waste management program for the California EPA.

The DTSC is responsible for compiling a list of hazardous materials site pursuant to Government Code Section 65962.5, which includes five categories:

- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the health and safety code;
- Land designated as "hazardous waste property" or "border zone property;"
- Properties with hazardous waste disposals on public land;
- Hazardous substance release sites selected for (and subject to) a response action; and
- Sites included in the Abandoned Site Assessment Program.

5.14.3 Local

5.14.3.1 County of San Diego Department of Environmental Health

The Hazardous Materials Division (HMD) of DEH regulates hazardous waste and tiered permitting, USTs, aboveground petroleum storage and risk management plans, hazardous materials business plans and chemical inventory, risk management plans, and medical waste. The HMD's goal is "to protect human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed" (County of San Diego 2010c).

5.14.3.2 County of San Diego Consolidated Fire Code

The San Diego region is unique within California in having fire protection districts within its boundaries. For the purposes of prescribing regulations in the unincorporated area of San Diego County, the applicable fire code is known as the County Fire Code and includes the Consolidated Fire Code and adopts, by reference, the most current version of the California Fire Code (CCR T- 24 part 9). The Consolidated Fire Code consists of local Fire Protection District ordinances that have modified the Fire Code portion of the State Building Standards Code and any County of San Diego modification to the Fire Districts' amendments. The purpose of the Code is for the protection of the public health and safety, which includes permit and inspection requirements for the installation, alteration, or repair of new and existing fire protection systems, and penalties for violations of the Code. The Code provides the minimum requirements for access, water supply and distribution, construction type, fire protection systems, and vegetation management. Additionally, the Fire Code regulates hazardous materials and associated measures to ensure that public health and safety are protected from incidents to hazardous substance release.

5.14.3.3 California EPA's Unified Program

In 1993, Senate Bill 1082 gave California EPA the authority and responsibility to establish a unified hazardous waste and hazardous materials management and regulatory program, commonly referred to as the Unified Program. The purpose of this program is to consolidate and coordinate six different hazardous materials and hazardous waste programs, and to ensure that they are consistently implemented throughout the state. California EPA oversees the Unified Program with support from the DTSC, RWQCBs, the San Diego County Office of Emergency Services (OES), and the State Fire Marshal.

State law requires county and local agencies to implement the Unified Program. The agency in charge of implementing the program is called the Certified Unified Program Agency (CUPA). The County of San Diego DEH, Hazardous Materials Division is the designated CUPA for the county. In addition to the CUPA, other local agencies help to implement the Unified Program. These agencies are called Participatory Agencies. The HMD is the Participatory Agency for San Diego County.

5.14.3.4 San Diego County Multi-Jurisdictional Hazard Mitigation Plan

Long-term prevention, mitigation efforts and risk-based preparedness for specific hazards within the city are addressed as a part of the 2010 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (HAZMIT), which was finalized in February 2010. The HAZMIT identifies specific risks for San Diego County and provides methods to help minimize damage caused by natural and man-made disasters. The final list of hazards profiled for San Diego County was determined as wildfire/structure fire, flood, coastal storms/erosion/tsunami, earthquake/liquefaction, rain-induced landslide, dam failure, hazardous materials incidents, nuclear materials release, and terrorism. The plan is currently being reviewed and revised to reflect changes to both the hazards threatening San Diego County as well as the programs in place to minimize or eliminate those hazards. This revision will include an evaluation of the impact climate change is having on the natural hazards facing San Diego. The San Diego County OES is responsible for coordinating with local jurisdictions and participating agencies to monitor, evaluate, and update the HAZMIT as necessary.

5.14.3.5 San Diego County Operational Area Emergency Plan

The 2010 San Diego County Operational Area Emergency Plan describes a comprehensive emergency management system which provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies and the private sector.

5.14.3.6 City of San Diego General Plan

The City's General Plan presents goals and policies relating to hazardous materials and disaster preparedness in the Public Facilities, Services, and Safety Element.

5.14.3.7 Brush Management Regulations

The City of San Diego Municipal Code includes general hazardous materials regulations (Sections 42.0801, 42.0901, and 54.0701) as well as regulations regarding specific hazardous materials such as explosives (Section 55.3301).

The City of San Diego Municipal Code includes regulations pertaining to brush management (Section 142.0412) and construction materials for development near open space (Chapter 14, Article 5) to minimize fire risk. Brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires submittal of Brush Management Plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise

approved by the City Fire Marshal, the brush management plans for all future development would consist of two separate and distinct zones as follows:

- Zone One would consist of the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone would not be allowed on slopes with a gradient greater than 4:1.

- Zone Two would consist of the area between Zone One and any area of native or non-irrigated vegetation and shall consist of thinned native or naturalized vegetation.

In addition, as a standard condition of approval, all future development within the CPU areas would be required to comply with the 2010 California Fire Code (CFC) requirements and the LDC Section 145.0701 et seq., "Additions and Modifications to Chapter 7 of the 2010 California Building Code." The CFC provides specific building requirements, including prohibitions on the use of wood shingles and special requirements for the provision of emergency access and water. Future development proposals would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards. Impacts due to wildland fires would be less than significant.

5.14.3.8 Airport Land Use Compatibility Plan

ALUCP's address issues related to safety include land uses, building height and densities (airspace protection and overflight policies) and noise. The San Diego International Airport is the closest airport to the CPU areas.



Chapter 6
Environmental Analysis – North Park

The following sections in Chapter 6 analyze the potential environmental impacts that may occur as a result of implementation of the proposed North Park CPU and associated discretionary actions. The environmental issues addressed in this Chapter include the following:

- Land Use
- Visual Effects and Neighborhood Character
- Transportation/Circulation
- Air Quality/Odor
- Greenhouse Gas Emissions
- Noise
- Historical Resources
- Biological Resources
- Geologic Conditions
- Paleontological Resources
- Hydrology/Water Quality
- Public Service and Facilities
- Public Utilities
- Health and Safety

Each issue analysis section is formatted to include a description of existing conditions, the criteria for the determination of impact significance, evaluation of potential project impacts including cumulative impacts, mitigation measures if applicable, and conclusion of significance after mitigation for impacts identified as requiring mitigation.

6.1 Land Use

This section discusses existing land use and the consistency of the proposed North Park Community Plan Update (CPU) and associated discretionary actions with applicable plans and regulations. This section analyzes the potential that implementation of the North Park CPU would permit designation or intensity of use that would have indirect or secondary environmental impacts.

6.1.1 Existing Conditions

The existing environmental setting and regulatory framework are provided in Chapters 2.0 and 5.0, respectively. Specific conditions applicable to the North Park CPU area are discussed below.

Existing Land Use

As discussed in Chapter 2.0, Environmental Setting, the North Park CPU area is developed with a variety of urban land uses. Single-family land uses make up 657 acres or 29 percent of the total acres and is the predominant land use within the North Park community. Multi-family use, which occupies the central core of the community, accounts for 501 acres or 22 percent of the total acreage in the community. Commercial uses including employment, retail, and services cover approximately 109 acres or five percent of the total area within the community, mostly in the form of strip commercial development. The remaining 44 percent is spread among roads, parks, and open space, institutional and semi-public facilities, industrial and vacant land. Of these remaining uses the largest is roadways. The existing land uses and distribution are depicted in Figure 6.1-1 and discussed below.

a. Residential

Residential land uses form the basis and majority of land use acreage in the community. Residential densities vary throughout the community. High to very high residential densities are designated along the community's major east–west commercial/mixed-use corridors – El Cajon Boulevard and University Avenue. The 30th Street commercial/mixed-use corridor transitions from Medium-High residential density in the northern part of the community where it intersects with Adams Avenue, then transitions to Medium residential density within the center of the community. Areas of High to Very High residential density occur where 30th Street intersects with El Cajon Boulevard and University Avenue. The center of the community includes a large portion of Medium-High to High residential density designated properties. Multi-family residential densities transition from High and Very High residential density north of El Cajon Boulevard to Low residential density south of El Cajon

Map Source: SanGIS

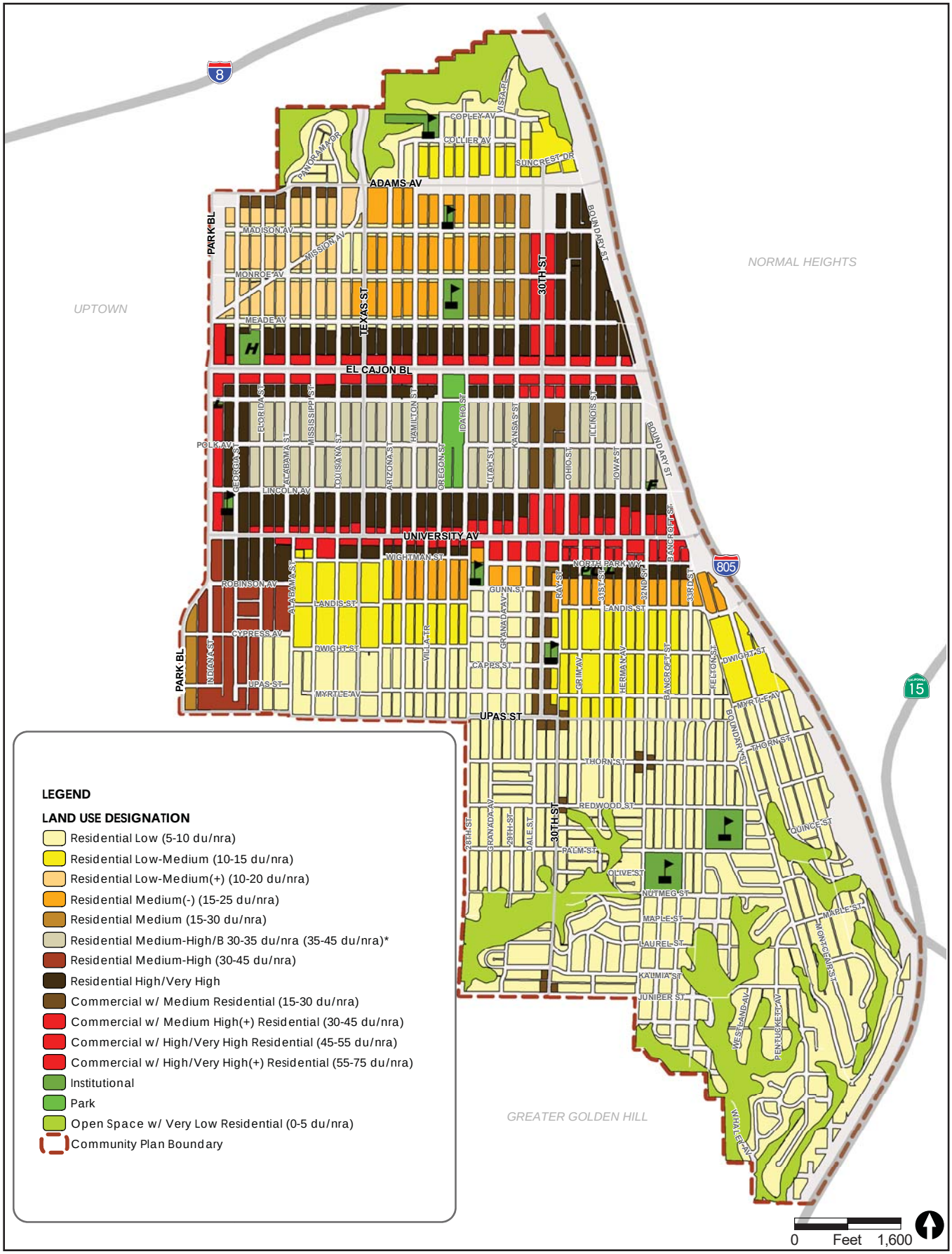


FIGURE 6.1-1

Land Uses under Adopted Community Plan – North Park

Boulevard. The Low residential density areas of the community include stable single-family neighborhoods and are located generally at the northern and southern ends of the community. These areas are characterized by the canyons and hillsides bordering Mission Valley to the north and the various finger canyons shared by the Golden Hill community to the south.

b. Commercial

Commercial land uses are located primarily along the community's transportation corridors: El Cajon Boulevard, University Avenue, Adams Avenue, and 30th Street. Smaller "islands" of commercial–retail also exist within the single-family residential neighborhoods located in the southern part of the community at 30th Street and Redwood and Thorn and 32nd Street. Commercial uses at 30th Street and Juniper Street connect with the larger commercial business district in the South Park neighborhood of the Golden Hill community. These commercial areas in addition to stand-alone commercial uses provide for mixed-use development. Mixed-use development along portions of El Cajon Boulevard and University Avenue within North Park have resulted in a condition where commercial storefronts have become vacant over long periods of time or where marginal commercial uses such as liquor stores and pay-day lending establishments have come to occupy highly visual street corners and intersections.

c. Institutional

Institutional uses provide either public or private facilities that serve a public benefit. These uses may serve the community or a broader area. Typically, the larger or more significant public uses such as schools and fire stations are identified on the land use map. Major institutional land uses within the community consist mainly of Fire Station 14, the North Park Branch Library, and several public and private schools. Private institutional uses often require a Conditional Use Permit or other type of discretionary permit per the San Diego Municipal Code. The expansion and associated upgrade of private schools within North Park has been an issue, as these facilities are typically constrained by locations within built-out residential neighborhoods.

d. Parks and Open Space

Parks and open space areas fulfill a variety of important purposes in the community including active and passive recreation, conservation of resources and protection of views, and providing visual relief in a built-out urban environment. Open space is generally free from development or may be developed with limited, low-intensity uses in a manner that respects the natural environment and conserves sensitive environmental resources.

Protection of resources within lands designated as open space affects multiple property owners (including the City of San Diego) and is accomplished primarily through application of various development regulations of the Municipal Code, particularly the Environmentally Sensitive Lands (ESL) Regulations. The City has pursued acquisition of private parcels or acquisition of easement as a means of conserving open space resources and protecting environmentally sensitive areas from development.

Table 2-1, North Park Existing Land Uses provides the acreage of land area covered by land use category for the existing conditions. Descriptions of the categories from the City's General Plan Land Use and Community Planning Element (Table LU-4) that are applicable to the North Park community are presented in Table 5-1, General Plan Land Use Categories. Application of these categories for consistency with the General Plan Land Use and Community Planning Element is accomplished with approval of individual CPUs.

Adopted North Park Community Plan

The adopted North Park Community Plan (1986) covers approximately 1,466 acres. The adopted Community Plan provides more detailed land use, design, roadway, and implementation information than what is found at the General Plan level. The adopted Community Plan identifies key issues in the community and enumerates a set of objectives to achieve the community's vision. Specific goals, objectives, and policies to implement the adopted North Park Community Plan are contained in its elements: Housing, Commercial, Transportation and Circulation, Community Facilities, Park and Recreation, Open Space, Conservation, Cultural and Heritage Resources, and Urban Design. The adopted North Park Community Plan would be replaced by the proposed North Park CPU.

6.1.2 Significance Determination Thresholds

The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in environmental impacts considered significant under California Environmental Quality Act (CEQA). Thresholds used to evaluate potential impacts related to land use are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. A significant land use impact would occur if implementation of the proposed North Park CPU and other associated discretionary approvals would:

1) Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an indirect or secondary environmental impact;

2) Lead to development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community;

3) Conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan; or

4) Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).

Issues addressed in the City's CEQA Significance Thresholds that are not addressed in this document include whether the project would increase the base flood elevation for upstream properties, or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone. During initial project scoping, it was determined that implementation of the proposed North Park CPU and associated discretionary actions would not result in significant impacts related to increases in the base flood elevation or construction in an SFHA or floodplain/wetland buffer zone because existing Land Development Code regulations would adequately address potential impacts related to grading within a SFHA (Municipal Code, Chapter 14, Article 2, Division 2 Drainage Regulations and Chapter 14, Article 3, Division 1 Environmentally Sensitive Lands Regulations). Thus, there is no further discussion of this issue area.

6.1.3 Impact Analysis

Issue 1 Conflicts with Applicable Plans

Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?

a. City Of San Diego General Plan

The proposed North Park CPU and other associated discretionary approvals are intended to express General Plan policies in the North Park CPU area through the provision of site-specific recommendations that implement Citywide goals and policies, address community needs, and guide zoning. The CPU and General Plan work together to establish the framework for growth and development for North Park. The proposed North Park CPU contains eleven elements, each providing neighborhood-specific goals and recommendations. These goals and recommendations are consistent with development design guidelines, other mobility and civic guidelines, and programs in accordance with the general goals stated in the General Plan.

Table 6.1-1 provides a list of the proposed North Park CPU policies for each element referenced in the following land use analysis. Additionally, a description of the proposed land use and allowed densities where included in Table 6.1-2; locations of proposed land uses are shown in Figure 3-1.

Table 6.1-1
Applicable CPU Policies Related to Land Use

Policy	Description
Land Use Element	
Community Villages	
LU-3.1	Continue to promote North Park's Community Villages as attractive destinations for living, working, shopping, and entertainment.
LU-3.2	Prioritize the implementation of future park sites and public space within village areas with input from the public.
LU-3.3	Provide public spaces within each Community Village and Neighborhood Commercial Center (Refer to General Plan Policies UDC. 1, UD-C.5 and UD-E.1).

Table 6.1-1 Applicable CPU Policies Related to Land Use	
Policy	Description
Corridor	
LU-3.4	Focus the highest intensity development (residential and non-residential) on both El Cajon Boulevard and University Avenue around the transit stops to capitalize on access to transit, boost transit ridership, and reduce reliance on driving.
LU-3.5	Orient street frontages towards these corridors, and provide space for outdoor seating and for retailers to display their wares.
LU-3.6	Permit parcel accumulation along the commercial corridors that may have multiple designations in order to reallocate residential densities to the commercially-designated portion of a site. However, care must be taken so as not to permit development that is out of scale with the surrounding neighborhood. New development should blend into the visual environment of the neighborhood.
LU-3.7	Preserve and reuse historic properties located along the corridors.
LU-3.8	Provide sidewalks that are 15 feet wide (minimum) along all of these corridors to enhance pedestrian and commercial activity.
LU-3.9	Require ground-floor commercial uses, such as retail spaces and small businesses as shown by the symbol "Active Frontage Required" on Figure 2-2: Active Frontage of the Land Use Element.
LU-3.10	Encourage multiple use along Park Boulevard between Adams Avenue and Meade Avenue emphasizing higher residential density and office use.
LU-3.11	Allow stand-alone residential development or live-work units as an option along linear commercial corridors between major mixed-use nodes such as along Adams Avenue between 30th Street and Texas Street and along 30th Street between Adams Avenue and El Cajon Boulevard.
LU-3.12	Support the redevelopment of the existing supermarket site along 30th Street, between Howard and Lincoln, to incorporate high-density residential development with commercial and office uses on the ground floor.
LU-3.13	Develop neighborhood commercial centers to provide neighborhood serving uses and convenience services to residents within the surrounding low-density single-family areas.
LU-3.14	Develop neighborhood commercial centers with an emphasis on building design and uses that are compatible to their surrounding single-family areas.
Residential	
LU-4.1	Maintain the low density character of predominantly single family areas, outside of the designated higher density areas primarily located along El Cajon Boulevard and University Avenue, and encourage rehabilitation where appropriate.
LU-4.2	Maintain the lower density character of the residential areas north of Adams Avenue.
LU-4.3	Maintain the lower density character of the residential areas east and west of 30th Street and south of Landis Street.
LU-4.4	Maintain consistent residential land use designations along east-west running streets within the northern and southern single-family neighborhoods of North Park such as Madison Avenue, Monroe Avenue, Meade Avenue, Wightman Street, Gunn Street, Landis Street, Dwight Street, Myrtle Avenue, and Upas Street in order to promote and maintain a walkable and pedestrian scale within these neighborhoods.
LU-4.5	Provide a diverse mix of housing opportunities, including senior and housing for the disabled, within close proximity to transit and services.
Affordable Housing	
LU-4.6	Develop larger sized (three bedrooms) affordable units; housing with high-quality private open space; and residential units that are adaptable to multi-generational living.
LU-4.7	Promote the production of very-low and low income affordable housing in all residential and multi-use neighborhood designations.
LU-4.8	Create affordable home ownership opportunities for moderate income buyers.

Table 6.1-1 Applicable CPU Policies Related to Land Use	
Policy	Description
LU-4.9	Encourage the development of moderately priced, market-rate (unsubsidized) housing affordable to middle income households earning up to 150% of area median income.
LU-4.10	Promote homebuyer assistance programs for moderate-income buyers.
LU-4.11	Utilize land-use, regulatory, and financial tools to facilitate the development of housing affordable to all income levels.
Residential Infill	
LU-4.12	Achieve a diverse mix of housing types and forms, consistent with allowable densities and urban design policies.
LU-4.13	Balance new development with the rehabilitation of high-quality older residential development.
LU-4.14	Support the construction of larger housing units suitable for families with children.
LU-4.15	Support rental and ownership opportunities in all types of housing, including alternative housing such as companion units, live/work studios, shopkeeper units, small-lot housing typologies, and for-sale townhomes.
LU-4.16	Encourage preservation and renovation of culturally and historically significant residential units and provide incentives to retrofit or remodel units in a sustainable manner.
LU-4.17	Rehabilitate existing residential units that contribute to the historic districts' character and fabric. Encourage adaptive reuse of historically or architecturally interesting buildings in cases where the new use would be compatible with the structure itself and the surrounding area.
LU-4.18	Support development of companion housing units in lower density areas to provide additional residential units and opportunities for co-generational habitation.
LU-4.19	Discourage parcel consolidation over 14,000 square feet in the lower density and historic district areas to maintain the historic building pattern of smaller buildings.
LU-4.20	Encourage the redevelopment of multi-family housing built between 1960 and 1980.
Commercial/Mixed-Use	
LU-5.1	Support a diversity of compatible goods and specialty services along commercial streets so that that the needs of local residents can be met locally.
LU-5.2	Encourage mixed-use development along Neighborhood Commercial and Community Commercial designated corridors in the community and at major village centers, commercial nodes and intersections.
LU-5.3	Do not support the inclusion/development of new drive-thrus within Neighborhood Commercial and Community Commercial designated properties. .
LU-5.4	Encourage mixed-use development to include retail, offices, and housing at medium to very high densities within commercial nodes.
LU-5.5	Design commercial spaces within mixed-use developments for maximum flexibility and reuse to prevent long-term vacant commercial storefronts.
LU-5.6	Enhance the level and quality of business activity in North Park by encouraging infill of retail and commercial uses and mixed-use development that emphasizes adaptive re-use.
LU-5.7	Improve the appearance of commercial development while encouraging adaptive re-use and preservation of historic structures.
LU-5.8	Encourage and maintain small locally-owned stores, provided that their uses remain compatible with surrounding neighborhoods.
LU-5.9	Promote the flexibility of underutilized strip commercial areas and surface parking lots for multiple activities such farmers' markets, art and cultural festivals, and other community events.
LU-5.10	Promote revitalization within business districts while addressing the potential impacts to adjacent residential neighborhoods.
LU-5.11	Encourage multiple use along 30th Street including higher density residential development and office use.

Table 6.1-1 Applicable CPU Policies Related to Land Use	
Policy	Description
LU-5.12	Allow stand-alone multi-family development or allow mixed-used development as an option along linear commercial corridors between mixed-nodes in order to increase the population density within these areas and support commercial uses.
LU-5.13	Allow full alcohol sales in Neighborhood Commercial areas as part of full service restaurants.
LU-5.14	Limit the incorporation of "open air" concepts into eating and drinking establishments located in Community Commercial properties. (Refer to the Noise Element)
Institutional	
LU-6.1	Revert the underlying land use of institutional uses to that of the adjacent land use designation when public properties cease to operate and are proposed for development.
LU-6.2	Strive to achieve early and meaningful participation for nearby residents related to future development and expansion plans for institutional uses within the community.
LU-6.3	Evaluate use permits and other discretionary actions for appropriate development intensity and effects on visual quality and neighborhood character. Additional impacts, such as those related to mobility, noise and parking demand should also be evaluated as needed.
LU-6.4	Continue to maintain school sites for a public serving purpose such as a park, community/recreation center, when they are considered for reuse and no longer serve to function as educational centers.
LU-6.5	Any expansion or redevelopment of institutional uses should incorporate intensified usage of existing institutional sites based on remaining on-site development capacity subject to discretionary review for impacts to visual quality, traffic, and noise. Should any acquisition of adjacent properties be proposed, existing structures are to be adaptively re-used and maintained on site.
Parks and Open Space	
LU-7.1	Protect designated open space from development and secure public use where desirable by obtaining necessary property rights through public acquisition of parcels or easements.
LU-7.2	Allow development of limited, low intensity uses in a manner that respects the natural environment and conserves environmentally sensitive lands and resources for parcels within designated open space.
LU-7.3	Obtain conservation or no-build easements for protection of environmentally sensitive resources through review and approval of discretionary development permits for private property within designated open spaces.
LU-7.4	Utilize publicly-controlled open space for passive recreation where desirable and feasible.
Urban Design Element	
Streetscape and Public Realm	
~~UE~~UD-2.1~~2~~	~~Consider plazas, courtyards, pocket parks, and terraces with commercial and mixed-use buildings.~~ Create publicly accessible plazas and paseos as part of new development.
UD-2.2	Accentuate key focal points, entrances, and corners of a development with art, signs, special lighting, and accent landscaping.
~~UE~~UD-2.5	~~Encourage the creation of public plazas at gateways, nodes, and street corners with transit stops to help activate street corners and provide a foreground to building entrances.~~Provide continuous and consistently designed right-of-way improvements, so that a development project reads as one unified project. Create a seamless connection of landscape improvements between properties and across streets.
UD-2.13	Improve pedestrian environments in the community with wider sidewalks where needed, enhanced crosswalks and paving and better access and connectivity, shade-producing street trees, street furnishings, and amenities that support walking.

Table 6.1-1 Applicable CPU Policies Related to Land Use	
Policy	Description
~~Core and Mixed-Use~~Centers and Corridors	
~~UE-1.8~~ UD-3.1	~~Preserve and encourage the enhancement of the Adams Avenue "Antique Row" and commercial node.~~ Design buildings to incorporate modulation, facade articulation, and offsetting planes to help reduce their visual bulk and to provide visual interest by avoiding monotonous facades.
UD-3.2	Avoid uninterrupted blank walls along all building facades.
UD-3.3	Incorporate accent landscape plantings along building facades that highlight architectural features and help create inviting pedestrian-oriented frontages.
UD-3.15	Design buildings to address corners as focal points with features that encourage pedestrian activity and accentuate the community's major intersections. a. Incorporate a dedicated entry court, public plaza, and/or public art element. b. Incorporate distinct building forms and accentuated building corners and frontages. c. Provide a change in materials, or increased building transparency. d. Provide a sense of building verticality or a tower element at corners.
UD-3.22	Promote a strong pedestrian and bicycling orientation along El Cajon Boulevard.
Traditional ~~Consistent~~ Character Neighborhoods~~Area~~	
~~UE~~UD-3.47~~1.21~~	~~Preserve and retain the single-family character created by small lots along Mission Avenue.~~ Preserve and retain the existing character-defining lot patterns within Traditional Character Neighborhoods.
UD-3.48	Maintain the prevailing front yard setbacks within Traditional Character Neighborhoods in order to maintain the historical development patterns.
Gateways ~~and Nodes~~	
~~UE-2.17~~UD-2.41	~~Preserve and encourage the continued enhancement of the Adams Avenue "Antique Row" and commercial node.~~ Enhance the Gateways into North Park within the community by utilizing signage, landscaping, other public improvements, iconic architecture, monuments, plazas, and public art.
Economic Prosperity Element	
Commercial Business Districts	
EP-1.3	~~Concentrate commercial activity in the vicinity of mixed-use corridor intersections, with pedestrian orientation to distinguish the nodes and Adams Avenue and 30th Street, University Avenue and 30th Street, and University Avenue and Upas Street.~~Attract unique commercial businesses that are reflective of the diverse economic commercial areas history and strengthen North Park's village-style environments which are pedestrian-oriented.
EP-1.5~~4~~	~~Encourage mixed-use development shopkeeper units to attract residents to the core commercial areas, where appropriate.~~Ensure adequate network of transportation services to meet the needs of nightlife patrons (e.g., safe ride, taxis, car services, extended hours for public transportation).
EP-1.7~~5~~	~~Promote development of physical space such as shopkeeper units, co-work spaces, and business incubators that supports targeted commercial uses and start-up and entrepreneurial enterprises~~Support the expansion of North Park's Arts District on Ray Street, which in result could attract patrons to the rest of the community's commercial districts.
Recreation Element	
Existing and Future Population-Based Parks and Recreation Facilities	
RE-1.3~~1~~	Encourage proposed residential, commercial, and mixed-use development to include recreational facilities to serve ~~existing, as well as new~~all residents. Consider incorporating non-traditional park and recreation amenities on rooftops of buildings and parking structures, and/or on the ground level within new buildings.
RE-1.10~~3~~	Develop smaller neighborhood parks, mini parks and pocket parks throughout the community, especially in areas more distant from larger public park facilities with high-density, mixed-use as a priority.

Table 6.1-1 Applicable CPU Policies Related to Land Use	
Policy	Description
Sustainability and Conservation Element	
Sustainable Development	
SE-1.7	Encourage underdeveloped commercial/industrial lots and buildings for use as small farms with associated sale of agricultural products.
Local "Green" Initiatives	
SE-1.19~~22~~	Support sustainable infill and adaptive reuse which preserves North Park's historic buildings and leverages energy efficient construction.
Urban Forestry, Urban Agriculture, and Sustainable Landscape Design	
SE-1.39~~42~~	Locate community gardens in North P~~p~~ark where there is sufficient demand, appropriate land, and will not generate adverse impacts on adjacent uses.
SE-1.414	Ensure that local development regulations allow for small-scale, compatible agricultural use of property, including edible landscaping, community gardens, and roadside food stands in appropriate areas of North Park.
Climate Change	
SE-2.1	Ensure that new development is consistent with the General Plan and Community Plan sustainability policies and the City's Climate Action Plan.
Environmentally Sensitive Lands Regulations	
SE-3.6	Areas mapped as designated open space should be preserved through easements, open space dedication, and/or fee title ownership by the City of San Diego.
Air Quality and Health	
SE-4.1	Encourage the relocation of incompatible uses that contribute to poor air quality.
Noise and Light Element	
Commercial and Mixed-Use Activity	
NE-3.2~~3~~	Locate the commercial portion of new mixed-use developments away from existing single-family residences.
Historic Preservation Element	
Identification and Preservation of Historical Resources	
HP-2.1	Provide ~~amendments to the Historical Resources Regulations of the Municipal Code for the protection of all potential historic districts identified in the adopted North Park Historic Resources Survey (including those identified by the community and included in Appendix J of the Survey Report) until such time as they can be intensively surveyed, verified, and brought forward for Historic Designation consistent with City regulations and procedures.~~interim protection of potential historic districts until such time as they can be intensively surveyed, verified, and brought forward for Historic Designation consistent with City regulations and procedures.
HP-2.2	Intensively survey and prepare nominations for the potential historic districts identified in the North Park Historic Resources Survey, and bring those nominations before the Historical Resources Board for review and designation. Prioritization of district nominations may occur in consultation with community members and stakeholders based upon a variety of factors, including redevelopment pressures and availability of resources.

Table 6.1-1
Applicable CPU Policies Related to Land Use

Policy	Description
Arts and Culture Element	
Public Art	
AC-1.3	Provide space for North Park's cultural and creative sector. a. Develop ~~mixed-use artist centers,~~ affordable live/work housing, and ~~a series of~~ facilities that include quality exhibition space, teaching studios, shared work spaces, and meeting/lecture spaces. b. Utilize vacant and/or underutilized storefronts and other non-residential buildings for temporary art exhibitions. c. ~~Encourage the provision of~~Provide spaces for arts and culture performances, as well as ~~and art~~ events and festivals in ~~the~~ neighborhood parks, transit ~~stations~~hubs, ~~residential developments,~~and other public areas ~~within private developments~~.

Table 6.1-2
North Park Community Plan Proposed Land Use Designations

General Plan Land Use	Community Plan Designation	Specific Use Consider-ations	Description	Intensity	
				Residential Density (dwelling units/acre)	Development Form
Park, Open Space & Recreation	Open Space	None	Provides for the preservation of land that has distinctive scenic, natural or cultural features; that contributes to community character and form; or that contains environmentally sensitive resources. Applies to land or water areas that are undeveloped, generally free from development, or developed with very low-intensity uses that respect natural environmental characteristics and are compatible with the open space use. Open Space may have utility for: primarily passive park and recreation use; conservation of land, water, or other natural resources; historic or scenic purposes; visual relief; or landform preservation.	0-1	RS-1-1 zone
	Population-based Parks	None	Provides for areas designated for passive and/or active recreational uses, such as community parks and neighborhood parks. It will allow for facilities and services to meet the recreational needs of the community as defined by the Community Plan.	N/A	OP-1-1 Zone

Table 6.1-2
North Park Community Plan Proposed Land Use Designations

General Plan Land Use	Community Plan Designation	Specific Use Consider-ations	Description	Intensity	
				Residential Density (dwelling units/acre)	Development Form
Residential	Residential - Low	None	Provides for single-family housing within a low residential density range and limited accessory uses.	5-9	RS-1-7 zone 0.60 FAR
	Residential – Low-Medium	None	Provides for both single-family and multifamily housing	10-15	RM-1-1 zone 0.75 FAR
	Residential - Medium	None	Provides for both single-family and multifamily housing	16-29	RM-2-4 and RM-2-5 zones 1.2 to 1.35 FAR
	Residential – Medium-High	None	Provides for multifamily housing	30-44[1]	RM-2-6, ~~and~~ RM-2-7, and RM3-7 zones 1.50 to 1.80 FAR
	Residential - High	None	Provides for multi-family housing	45-54	RM-3-8 zone 2.25 FAR
	Residential – Very High	None	Provides for multi-family housing	55-73	RM-3-9 zone 2.75 FAR
Commercial Employment, Retail, & Services	Neighbor-hood Commercial	Residential Permitted	Provides local convenience shopping, civic uses, and services serving an approximate three mile radius. Housing may be allowed up to a medium residential density within a mixed-use setting	0-29	CN-1-3 zones 1.0 FAR
				0-73	CN-1-5 zone 1.0 FAR
	Community Commercial	Residential Permitted[2]	Provides for shopping areas with retail, service, civic, and office uses for the community at-large within three to six miles. Housing may be allowed up to a high residential density within a mixed-use setting	0-29	CC-3-4 Zone 1.0 FAR
				0-44	CC-3-6 zone 2.0 FAR
				0-54	CC-3-7 Zone 2.0 FAR
			Provides for shopping areas with retail, service, civic, and office uses for the community at-large within three to six miles. Housing may be allowed up to a very high residential density within a mixed-use setting	0-73[2a]	CC-3-8 zone 2.0 FAR
				0-109[2b]	CC-3-9 zone 2.0 FAR

Table 6.1-2
North Park Community Plan Proposed Land Use Designations

General Plan Land Use	Community Plan Designation	Specific Use Consider-ations	Description	Intensity	
				Residential Density (dwelling units/acre)	Development Form
Institutional, Public, & Semi-Public Facilities	Institutional	None	Provides a designation for uses that are identified as public or semi-public facilities in the Community Plan and which offer public and semi-public services to the community. Uses may include but are not limited to: military facilities, community colleges, communication and utilities, transit centers, schools, libraries, police and fire facilities, post offices, hospitals, park-and-ride lots, government offices and civic centers.	N/A	Varies[3].

1 Residential Density up to 73 DU/AC allowed via Planned Development Permit
2 Stand-alone residential development would be allowed in linear commercial areas between commercial nodes.
2a Along Park Blvd. Residential Density up to 145 DU/AC allowed via Planned Development Permit.
2b Along El Cajon Blvd. Residential Density up to 145 DU/AC allowed via Planned Development Permit.
3 Refer to Municipal Code Regulations for specific institutional uses.

The **Land Use Element** of the proposed North Park CPU contains community-specific policies to guide development within the North Park community. This element establishes the distribution and pattern of land uses throughout the community along with associated residential densities.

North Park is a community with an established land use pattern that is expected to remain. The community has a unique level of complexity due to its long-standing and diverse development history; varied geography; and proximity to Balboa Park, Downtown, and Mission Valley. Policies within the Land Use Element are constructed to promote the overall land use goals of the proposed CPU, which include residential goals such as provision of a diversity of housing options. Commercial goals include appropriately located commercial and office facilities offering a wide variety of goods, services, and employment to benefit the entire community; continued revitalization of North Park's business districts that respect potential impacts to adjacent neighborhoods; and diversification of employment opportunities. Mixed-use goals generally include the creation of villages with a lively, walkable, bicycle-friendly and unique atmosphere that builds upon existing neighborhoods and includes places to live and work; buffer areas that minimize impacts between commercial and residential uses; and commercial/residential transition areas that promote compatible development and reinvestment along the community's commercial districts.

As with the General Plan, the proposed North Park CPU places an emphasis on directing growth into mixed-use activity centers and transit corridors that are pedestrian and bicycle-friendly and linked to an improved regional transit system. Prior to the adoption of the General Plan, North Park was already in a position to promote "village-like" development with identified areas for mixed-use development already focused along major transportation corridors and policies for improving the

pedestrian environment by enhancing pedestrian activity in business districts and neighborhoods were already in place. North Park is expected to see an improved level of walkability, bicycling, and transit through the implementation of transportation-related projects and improvements and efforts that are focused within a number of community village areas and linear commercial corridors in the community. Projects such as the University Avenue Mobility Plan, which focuses on multi-modal improvements along University Avenue between Florida Street and Boundary Street, and the Mid-City Rapid Bus that runs along North Park's stretch of El Cajon Boulevard, provides safety, walkability, improved level of service, and faster travel times across the community's village and mixed-use areas.

The proposed Community Plan Enhancement Program would further implement General Plan goals for increased walkability by encouraging higher density housing in proximity to transit. The Community Plan Enhancement Program consists of the Transit-Oriented Development Enhancement Program and the Pedestrian-Oriented Infill Development Enhancement Program (Refer to Section 3.4.1.1 d of Chapter 3, Project Description). These programs would allow higher density development and create street and pedestrian friendly projects within specified areas with proximity to transit. In order to take advantage of these programs, future proposals would be required to obtain a Planned Development Permit that would allow for site specific project review to ensure consistency with applicable General and Community Plan policies.

The proposed North Park CPU would also be consistent with the General Plan goal of providing diverse and balanced neighborhoods and communities, and also furthers the goals for addressing environmental justice in the North Park community by providing additional housing stock and a diversity of housing types to serve the needs of the community. The land use plan prepared for the North Park CPU provides for a combination of land uses, which emphasize the existing diversity of the community, as well as a diversity that supports future growth and prosperity within the plan area.

The existing development within North Park provides a foundation for achievement of the goals laid out in the General Plan Mobility Element due to the urban character of the community, existing transit connections, and adjacency to major roadways and interstates. The proposed North Park CPU **Mobility Element** policies support the development of pedestrian-friendly facilities along major roadways and emphasize a safe bicycle network with provision of bicycle parking facilities for transition to pedestrian use within the commercial areas. The proposed North Park CPU also includes Intelligent Transportation System policies that promote the application of technology to transportation systems with the goal to maximize efficiency of services while increasing vehicle throughput, reducing congestion, and providing quality information to the commuting public.

The **Urban Design Element** of the proposed North Park CPU supports and implements the General Plan at the Community Plan level by including specific design guidelines and policies for the proposed CPU area that are consistent with the community's existing and evolving character. The proposed North Park CPU contains policies that are intended to improve the quality of life through safe and secure neighborhoods and in a manner that respects the natural environment. It addresses existing and planned access to outdoor and active spaces, and identifies active and passive open space areas, recreational facilities, and access via pedestrian and bicycle pathways. The North Park CPU includes policies to allow increased densities and building heights in areas

identified as Community Commercial Transit-Oriented Development Enhancement Program Areas. Within the Urban Design Element there are policies that address the areas of transition between the mixed-use commercial areas along transit corridors, and adjacent residential areas. Additionally, this element includes public art and cultural amenities policies that are further enhanced by a separate arts and culture element, described below.

The **Economic Prosperity Element** proposes increase employment within the community by increasing small business opportunities and supports a diverse mix of businesses that provide a variety of goods and services. This element identifies the value of successful home-grown arts and culture districts, as well as entertainment/hospitality districts that appeal to local and regional residents, as well as tourists. Additionally, the Economic Prosperity Element calls for the revitalization of the community through enhancement of local production of food, arts and culture, hospitality entertainment, and services.

Consistent with the Public Facilities, Services, and Safety Element of the General Plan, the proposed North Park CPU **Public Facilities, Services, and Safety Element** also includes goals to provide and maintain infrastructure and public services for future growth without diminishing services to existing development. Specific policies regarding public facilities financing, public facilities and services prioritization, as well as fire-rescue, police, wastewater, storm water infrastructure, waste management, and recycling libraries, schools, public utilities, and healthcare services and facilities, are all included within the proposed North Park CPU.

In regards to the Recreation Element of the General Plan, the proposed North Park CPU also provides **Recreation Element** policies that support the pursuit of land acquisition needed for the creation of public parks, with a special effort to locate new parkland within the community, promoting connectivity, safety, public health, and sustainability. Strategies to reduce the existing parkland deficit in the plan area are also included in the Recreation Element. Policies to provide parkland to help meet the needs of the community through plan build-out and provide for preservation, protection, and enhancement of existing and planned parkland facilities are included. As discussed in the Recreation Element there is an existing deficit of park land in North Park, with the changes in density and population, the North Park Community would continue to have a deficit of nearly 101 acres of population-based park space. The proposed North Park CPU Recreation Element includes community-specific policies addressing park and recreation guidelines, preservation, and accessibility. As proposed, the North Park CPU policies regarding parks and recreational facilities are consistent with the General Plan environmental goals, objectives, and guidelines policies; however implementation of the proposed North Park CPU would still result in a shortfall in the amount of population-based park land. While there are potential environmental impacts from the development of park and recreational facilities as discussed in Section 6.12, *Public Services and Facilities*, the proposed North Park CPU community-specific goals and recommendations are intended to support and implement the General Plan environmental goals, objectives, and policies.

The proposed North Park CPU and associated discretionary actions are consistent with the conservation policies contained within the Conservation Element of the General Plan. The **Sustainability and Conservation Element** of the proposed North Park CPU addresses the conservation goals and policies that can be effective in managing, preserving, and thoughtfully using

the natural resources of the community. Climate change and sustainable development/design is extensively addressed in a manner consistent with the General Plan within both the Urban Design Element and Conservation Element. Sustainable energy policies are included which promote development that qualifies for the City's Sustainable Buildings Expedite Program; educate residents and businesses on efficient appliances and techniques for reducing energy consumption; provide for, or retrofit, lighting in the public rights-of-way that is energy efficient; and provide information on programs and incentives for achieving more energy-efficient buildings and renewable energy production.

With respect to the General Plan policies concerning noise and land use compatibility, the **Noise and Light Element** of the proposed North Park CPU includes goals and policies to guide compatible land uses and require the incorporation of noise attenuation measures for new uses. Additionally, this element provides additional detail to General Plan policies. Light pollution is also addressed in this element.

The City of San Diego's General Plan Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. The North Park community is one of the oldest urban neighborhoods in San Diego. The **Historic Preservation Element** of the proposed North Park CPU provides general policies to preserve significant historical resources. This element calls for the identification and preservation of significant historical resources, as well as educational opportunities and incentives relative to historical resources in North Park. Impacts relative to historical resources are discussed in Section 6.7, Historical Resources.

The proposed North Park CPU is unique in that it contains an additional element: the **Arts and Culture Element**. The proposed North Park CPU considers the role public art can play in planning. This element addresses potential intersections between public art, redevelopment, new development, streetscape, cultural arts, social services, recreational facilities, transit and public space and creates a broad range of artistic possibilities and efforts in North Park. This element recognizes the integration of arts and culture throughout North Park as a significant tool for reinforcing community identity, increasing public use and enjoyment of public facilities, making memorable spaces in the community, leveraging North Park's cultural assets for economic growth, and to communicate the community's unique cultural identity.

As part of the proposed project analyzed within this Program Environmental Impact Report (PEIR), the City is updating the Impact Fee Study (IFS; formerly Public Facilities Financing Plan) for the North Park community, which was originally adopted in 2002. The IFS sets forth the major public facilities needs specific to the North Park community with respect to transportation (streets, storm drains, traffic signals, etc.), libraries, park and recreation facilities, and fire stations. The proposed North CPU is a guide for the future development within the community and serves to determine public facility needs. Revisions to public facility needs, Development Impact Fees (DIFs), or other capital improvement programs, would be included in the updated IFS.

b. Land Development Code Regulations

Implementation of the actions associated with adoption of the proposed North Park CPU would include several Land Development Code amendments described in Sections 3.4.2 and 3.4.3 of Chapter 3, Project Description. Specific actions include amending the existing Mid-City Communities Planned District Ordinance (PDO) to remove North Park from the PDO, rezoning all parcels contained in the North Park CPU area to Citywide zoning, adopting supplemental development regulations within the Historical Resources Regulations of the Municipal Code. The adopted PDO zoning used in North Park is found in Table 6.1-3 and the proposed Citywide zones are shown in Table 6.1-4.

Table 6.1-3
Adopted PDO Zones

Current Zone	Maximum Residential Density
Mid-City Communities Planned District Zones	
MR-3000	15 du/ac
MR-1750	25 du/ac
MR-1500	29 du/ac
MR-1250B	Lot size < 10,000 sf = 35 du/ac Lot size ≥ 10,000 sf = 44 du/ac
MR-1000	44 du/ac
MR-800B	Lot size < 15,000 sf = 54 du/ac Lot size ≥ 15,000 sf = 73 du/ac
CL-5	29 du/ac
CN-3	44 du/ac
CV-3	44 du/ac
CL-2	Lot size < 10,000 sf = 44 du/ac Lot size ≥ 10,000 sf and < 15,000 sf = 54 du/ac Lot size ≥ 15,000 sf = 73 du/ac
CL-1	Lot size < 15,000 sf = 54 du/ac Lot size < 30,000 sf = 73 du/ac Lot size ≥ 30,000 sf = 109 du/ac
CN-1	Lot size < 30,000 sf = 73 du/ac Lot size ≥ 30,000 sf = 109 du/ac
Citywide Zones[1]	
RS-1-1[1]	1 du/ac
RS-1-7[1]	9 du/ac
RM-1-1[2]	15 du/ac
RM-2-5[2]	29 du/ac
CN-1-2[2]	29 du/ac
CC-3-5[2]	29 du/ac

[1]Citywide zones RS-1-1 and RS-1-7 are currently utilized in the areas of the community designated as open space and single family.
[2]In limited instances the PDO zones have been rezoned to citywide zones as part of a development project approval.

Table 6.1-4
Proposed Citywide Zones

Proposed Zone	Maximum Residential Density (dwelling unit per acre)
OP-1-1	--
RS-1-1	1 du/ac
RS-1-7	9 du/ac
RM-1-1	15 du/ac
RM-2-4	29 du/ac
RM-2-5	29 du/ac
RM-2-6[1]	44 du/ac
RM-2-7[1]	44 du/ac
RM-3-7[1]	44 du/ac
RM-3-8	54 du/ac
RM-3-9	73 du/ac
CN-1-3	29 du/ac
CN-1-5	73 du/ac
CC-3-4	29 du/ac
CC-3-6	44 du/ac
CC-3-7	54 du/ac
CC-3-8[1]	73 du/ac
CC-3-9[2]	109 du/ac

[1] Pedestrian-Oriented Infill Development Enhancement Program allows a residential density bonus up to 73 du/acre for applicants with existing development projects of 6 units or more within the program area between Lincoln Avenue and Howard Avenue.

[2] Transit-Oriented Development Enhancement Program allows a residential density up to 145 du/acre along Park Boulevard via Planned Development Permit (see Figure 1-1 for location).

~~[2]~~[3] Transit-Oriented Development Enhancement Program allows a residential density up to 145 du/acre along El Cajon Boulevard via Planned Development Permit (see Figure 1-1 for location).

Application of existing, new, or modified zones would accommodate existing development, encourage new projects consistent with community goals and character, and implement mixed-use development consistent with the General Plan goals and policies.

c. ESL Regulations

Environmentally sensitive lands (e.g., sensitive biological resources, steep hillsides, historical resources) occur within the proposed North Park CPU area. Any future development proposed on environmentally sensitive lands would be subject to the City's ESL Regulations (Chapter 14, Article 3, Division 1), which require future projects demonstrate the proposed development site is physically suitable for the proposed use and that it would minimize disturbance to natural landforms and not

increase flood hazards. In the event a future specific project is considered for an ESL Regulations deviation, supplemental findings would be required prior to approval in order to show that development would not result in an additional public safety threat or extraordinary public expense, or create a public nuisance. Adherence to these regulations would avoid significant impacts to environmentally sensitive lands within the proposed North Park CPU area.

d. San Diego Forward – The Regional Plan

The proposed North Park CPU land use scenario would be consistent with the goals of San Diego Forward – the Regional Plan, prepared by San Diego Association of Governments (SANDAG) to develop compact, walkable communities close to transit connections and consistent with smart growth principles, as summarized above. The proposed North Park CPU proposes to establish pedestrian-oriented, urban, and mixed-use community villages that would reduce reliance on the automobile and promote walking and use of alternative transportation. Policies contained within the proposed North Park CPU Land Use and Mobility elements serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. These measures are consistent with San Diego Forward's smart growth strategies. The adoption and implementation of the proposed North Park CPU would not generate any conflict or inconsistencies with San Diego Forward – the Regional Plan. Therefore, the potential impacts would be less than significant.

Issue 2 Conversion of Open Space or Farmland

Would the proposed project lead to the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?

The proposed project involves an update to the North Park Community Plan, a fully built-out community in the City of San Diego, and other associated discretionary actions. The current makeup of the urbanized CPU area includes a mix of land uses that includes open space but no farmland. The siting of mixed uses in proximity to each other, the provision of enhanced pedestrian corridors and bicycle amenities, and the planned changes to the street network would additionally serve to foster community connectivity rather than create division.

Goals of the proposed North Park CPU Land Use and Mobility Elements that address community connectivity include supporting two, pedestrian-oriented community villages within the proposed CPU area that provides diverse housing opportunities and encourages quality neighborhood and community-supporting institutional and commercial uses. Overall, incorporation of the goals and recommendations of the elements contained in the proposed North Park CPU would enhance community connectivity. In addition, the North Park Conservation Element contains polices that preserve open space within the CPU area. Therefore, the implementation of the proposed North Park CPU would not lead to the development or conversion of identified open space or physically divide the community and would not result in any policies that would permit the conversion of open space in adjacent communities.

Issue 3 Conflicts with the MSCP Subarea Plan

Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

As discussed above, the highly urbanized planning area lies within the City's MSCP Subarea Plan, and contains preserve areas designated as Multi-Habitat Planning Area (MHPA) in the northern portion of the project area. Because the proposed North Park CPU area contains MHPA lands, the ESL Regulations limit development encroachment into sensitive biological resources. As concluded in Section 6.8, the proposed North Park CPU would be consistent with the MSCP Subarea Plan, and impacts would be less than significant.

Issue 4 Conflicts with an Adopted ALUCP

Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

The project site is located within San Diego International Airport's (SDIA) Airport Influence Area (AIA). The AIA is "the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses." To facilitate implementation and reduce unnecessary referrals of projects to the ALUCP, the AIA is divided into Review Area 1 and Review Area 2. The project site is located within Review Area 2 (Figure 6.1-2). The composition of each area is determined as follows:

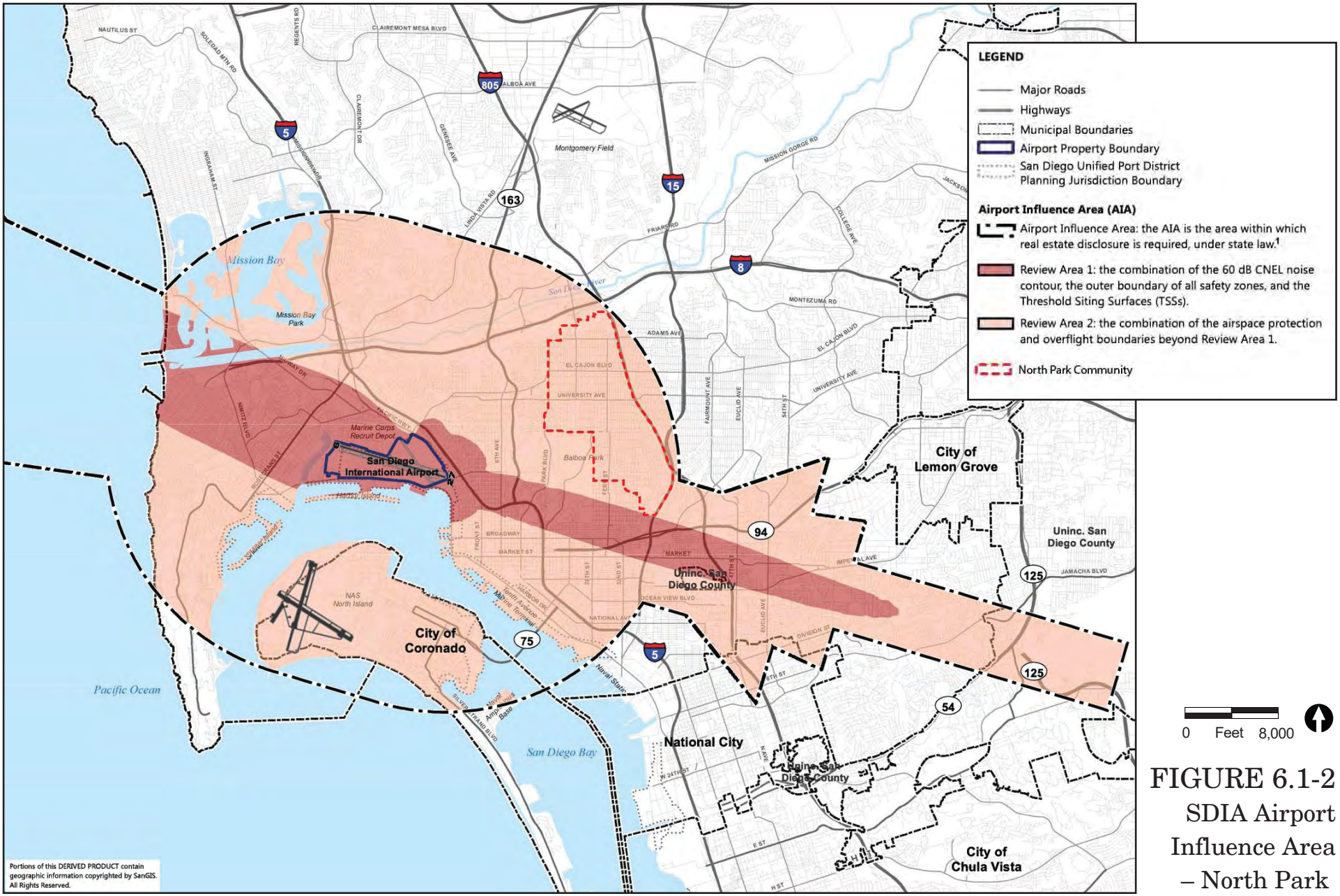
- Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSS). All policies and standards apply within Review Area 1.

- Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

The ALUCP contains four principal compatibility concerns: noise (exposure to aircraft noise), safety (land use factors that affect safety both for people on the ground and occupants of aircraft, airspace protection (protection of airport airspace), and overflight (annoyance or other general concerns related to aircraft overflights). The southeastern-most tip of the North Park community is located outside the community noise equivalent level (CNEL) noise contours for SDIA (Figure 6.1-3). Thus, airport noise impacts would be less than significant.

Safety compatibility standards of the ALUCP provide maximum residential density and nonresidential intensity limits that are allowable within the safety zones. The North Park community is not located within any Safety Compatibility Zones (Figure 6.1-4). Thus, impacts related to compliance with safety compatibility standards would be less than significant.

Map Source: SDIA - ALUCP



0 Feet 8,000

FIGURE 6.1-2
SDIA Airport Influence Area – North Park

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Map Source: SDIA - ALUCP

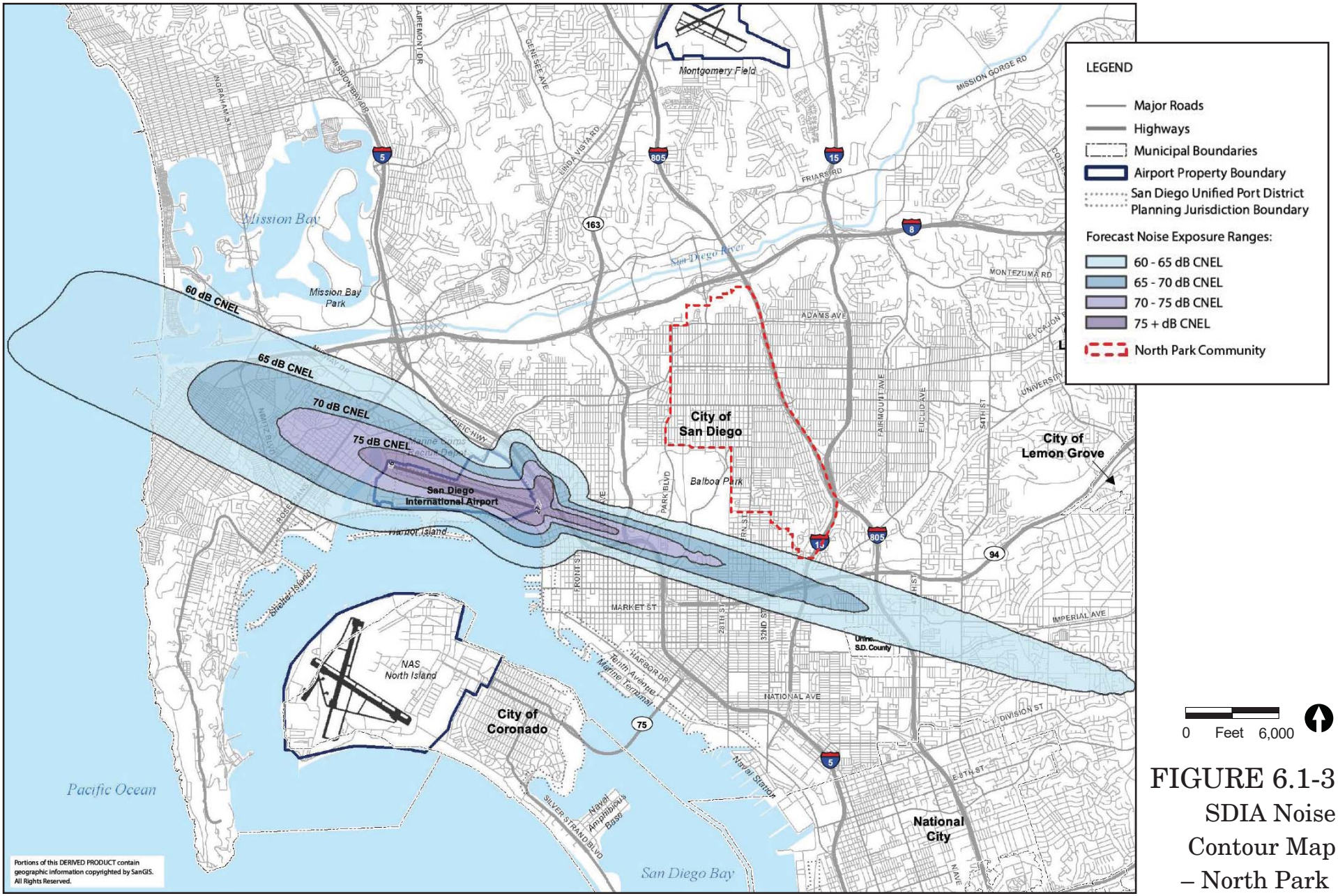
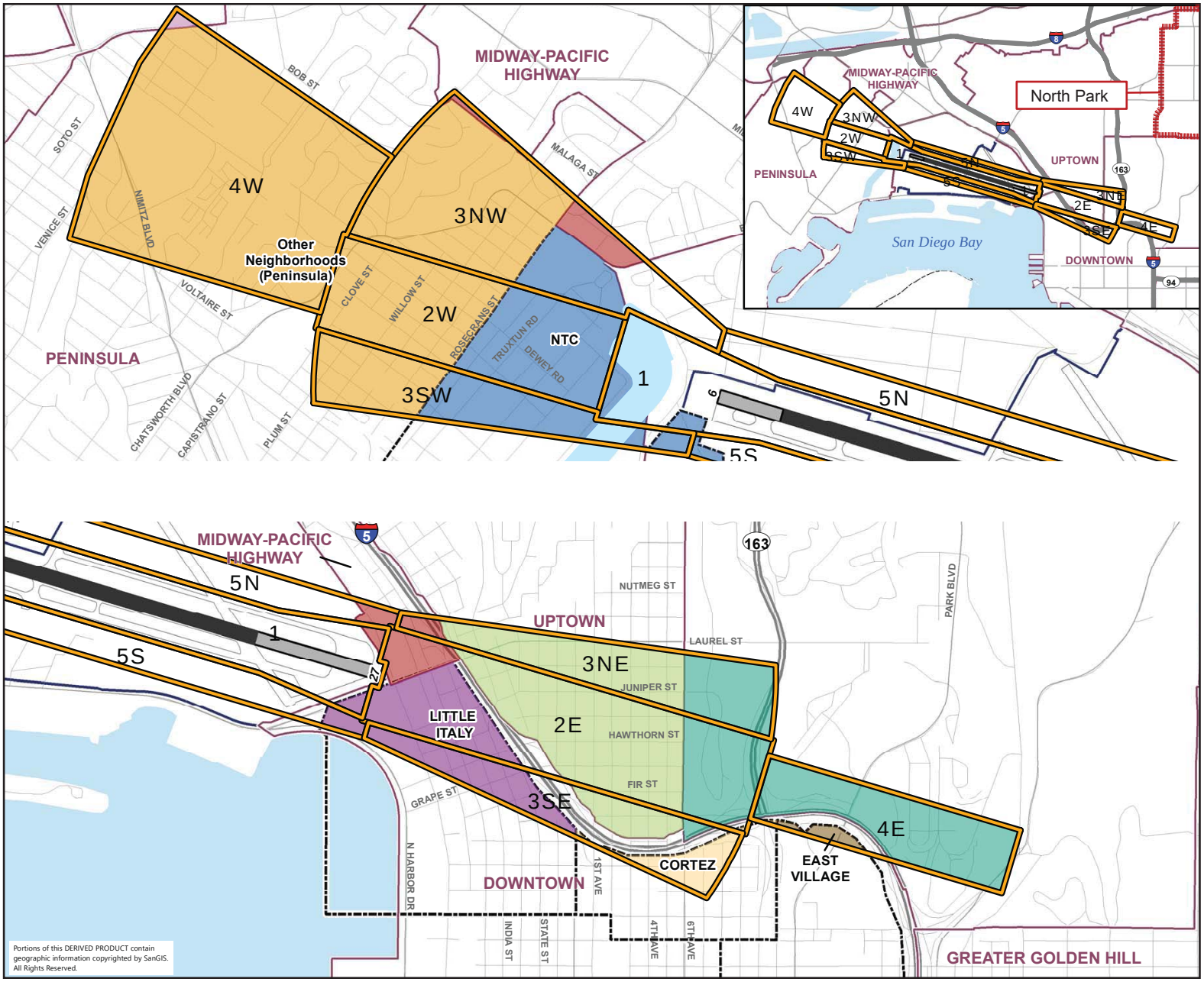


FIGURE 6.1-3
SDIA Noise Contour Map – North Park

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Map Source: SDIA - ALUCP



LEGEND

- Major Roads
- Highways
- Community Planning Areas
- Airport Property Boundary
- Displaced Thresholds
- Safety Compatibility Zone
- Neighborhood Boundaries
- Balboa Park
- Downtown – Cortez
- Downtown – East Village
- Downtown – Little Italy
- Midway-Pacific Highway
- Ocean Beach
- Peninsula – NTC
- Peninsula – Other Neighborhoods
- Uptown

0 Feet 1,500

FIGURE 6.1-4
SDIA Safety Compatibility Zones – North Park

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The airspace protection boundary (Figure 6.1-5) for SDIA establishes the area where the policies and standards of Chapter 4 of the ALUCP apply. The airspace protection boundary is based on the outermost edge of the following airspace surfaces:

- Part 77, Subpart B, 100:1 notification surface boundary
- Part 77 civil airport imaginary airspace surfaces
- The approach surfaces for both runway ends defined by the criteria in FAA Order 8260.3B, United States Standard for Terminal Instrument Procedures (TERPS)

The northwestern-most portion of the North Park community is located within the Terrain Penetrations of FAR Part 77 Surfaces. Future projects associated with community build-out located within this area would be required to obtain a Federal Aviation Administration (FAA) Part 77 Letter of Non-Obstruction, stating the project has no impacts on airspace protection. As such, impacts to airspace protection are less than significant.

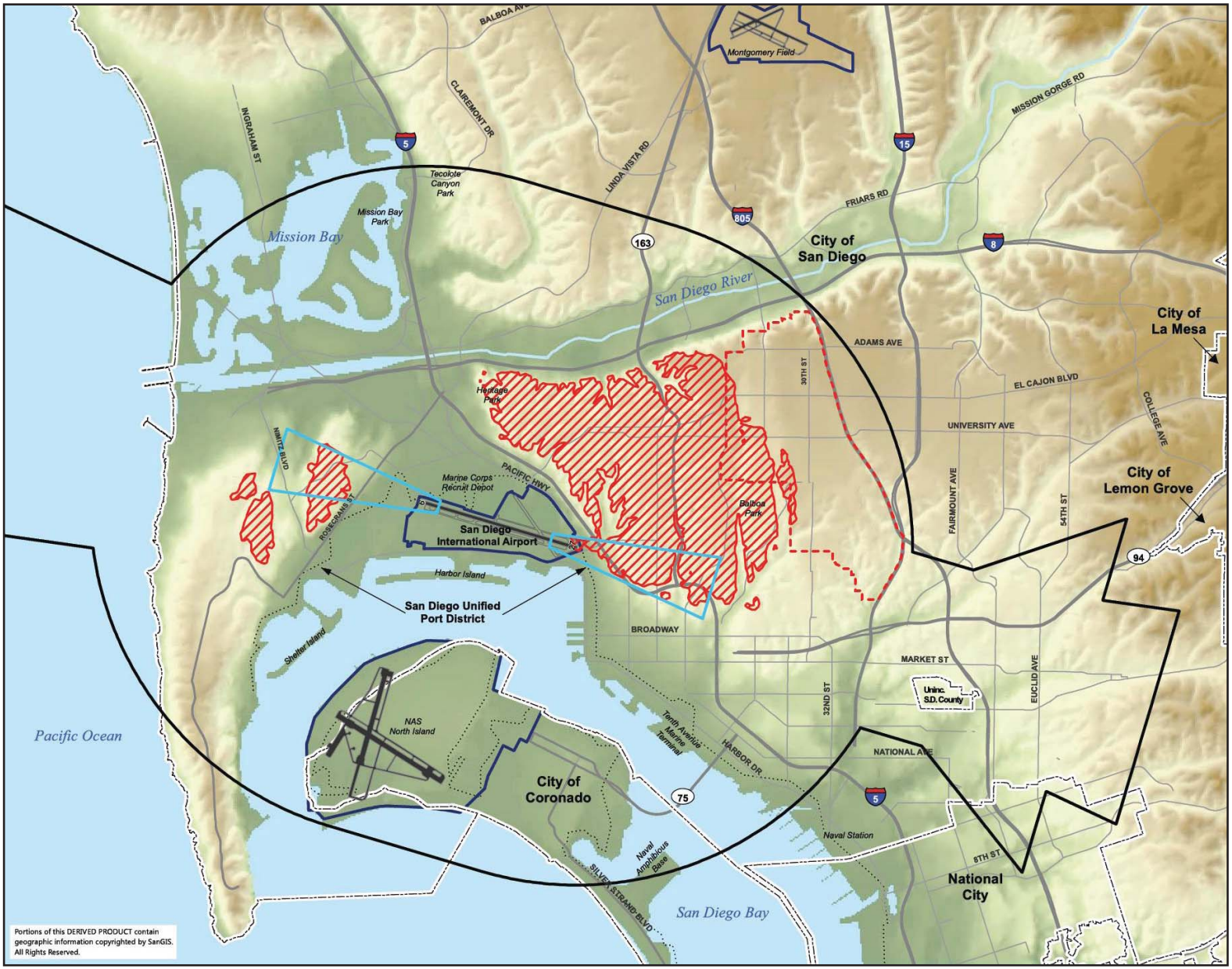
Overflight compatibility concerns apply to western and southern portions of the North Park CPU area, where the community is located within the Overflight Notification Area (Figure 6.1-6). An overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. The recordation of an overflight notification agreement is not necessary where the dedication of a navigation easement is required. Alternative methods of providing overflight notification are acceptable if approved by the Airport Land Use Commission. Future residential developments in the North Park community that are located within the overflight area for SDIA would have to comply with this notification requirement. No impacts would result.

Cumulative Impact Analysis

As discussed in this section, the proposed North Park CPU contains 11 core elements providing community-specific goals and policies that are consistent with citywide zoning classifications, development design guidelines, mobility guidelines, incentives, and programs in accordance with the goals of the City's General Plan and the implementing regulations of the City's Land Development Code. Both the North Park and Golden Hill CPUs along with the Uptown CPU would accommodate existing development as well as encourage development consistent with community goals and character.

All three of the CPUs would be consistent with and would implement the environmental goals and policies of the SANDAG's San Diego Forward – The Regional Plan. The three CPUs would be consistent with the City's Multiple Species Conservation Program. Development implemented in accordance with the North Park, Golden Hill, and Uptown CPUs would not result in conflicts with the City's ESL Regulations, as discussed in Sections 6.1 and 7.1 and in the Uptown PEIR, which contains policies supporting the goals of these regulations. Any development within the CPU areas that would encroach into ESL would be subject to review in accordance with the ESL Regulations (Land Development Code, Section 143.0101 et. seq.). The Golden Hill CPU also contains measures to evaluate and ensure the consistency of future development with the Airport Land Use Compatibility Plan for the San Diego International Airport. Based on the compatibility of the proposed CPUs (North Park, Golden Hill and Uptown) with the General Plan policy framework and other applicable land use plans and regulations, cumulative land use compatibility impacts associated with build-out of the CPUs would be less than significant.

Map Source: SDIA - ALUCP



LEGEND

- Major Roads
- Highways
- Municipal Boundaries
- Airport Property Boundary
- Airspace Protection Boundary[1]
- Threshold Siting Surface
- Terrain Penetrations of FAR Part 77 Surfaces

Terrain Elevations (in feet MSL)

- High : 847
- Low : 1

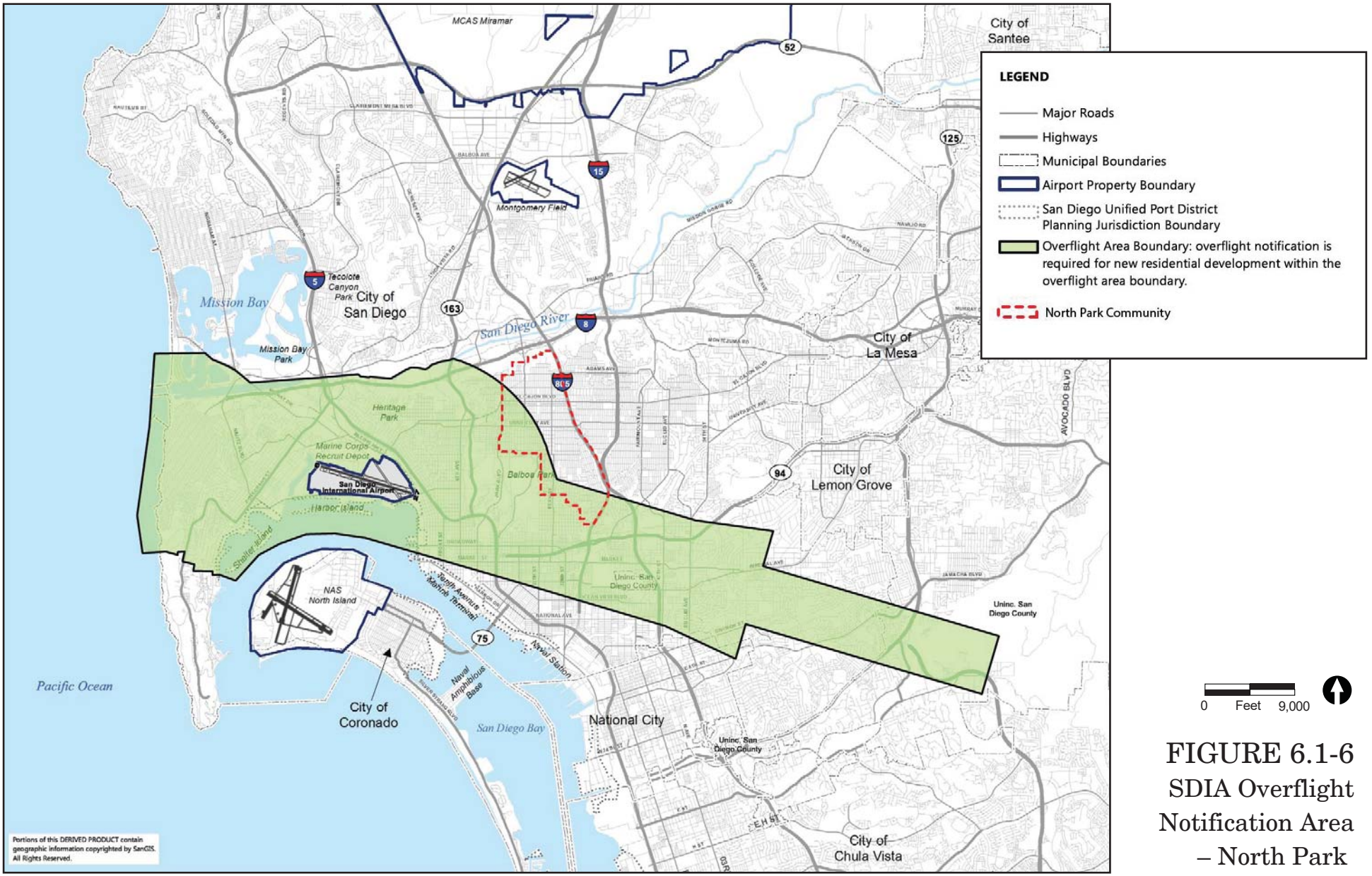
- North Park Community

0 Feet 6,000

FIGURE 6.1-5
SDIA Airspace Protection Boundary – North Park

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Map Source: SDIA - ALUCP



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FIGURE 6.1-6
SDIA Overflight Notification Area – North Park

6.1.4 Significance of Impacts

Issue 1 Conflicts with Applicable Plans

The proposed North Park CPU and associated discretionary actions are consistent with the General Plan and the City of Villages strategy. Furthermore, the policies developed for the proposed North Park CPU associated with each of the elements were drafted in a manner that is consistent with the General Plan and San Diego Forward – the Regional Plan. Proposed amendments to the Land Development Code and zoning amendments would implement the proposed CPU and would be consistent with applicable environmental goals, objectives and guidelines of the General Plan. The proposed change from the PDO to Citywide zone would not create any conflicts or inconsistencies with the adopted Land Development Code. Future development in accordance with the proposed North Park CPU would be required to comply with ESL regulations. As the proposed North Park CPU and associated discretionary actions would be consistent with applicable environmental goals, objectives, or guidelines of a General Plan, no indirect or secondary environmental impact would result and impacts would be less than significant. No mitigation is required.

Issue 2 Conversion of Open Space or Farmland

The proposed North Park CPU and associated discretionary actions would not result in the conversion of open space or physically divide an established community. Community connectivity would be enhanced by provisions in the proposed North Park CPU that improve pedestrian and transit amenities. Impacts would be less than significant; therefore, no mitigation would be required.

Issue 3 Conflicts with the MSCP Subarea Plan

Implementation of the proposed North Park CPU and associated discretionary actions would not have significant impacts on the MHPA because ESL Regulations would limit development encroachment into sensitive biological resources. and would be consistent with the MSCP. Therefore, impacts related to conflicts with the MSCP Subarea Plan would be less than significant and no mitigation is required.

Issue 4 Conflicts with an Adopted ALUCP

Although the North Park community is within the SDIA AIA, the proposed North Park CPU and associated discretionary actions would not result in conflicts with the adopted ALUCP. Future projects would be required to receive Airport Land Use Commission consistency determinations, as necessary which would ensure future projects are reviewed for consistency with the SDIA ALUCP. As a result, the proposed North Park CPU and associated discretionary actions would not result in land uses that are incompatible with an adopted Airport Land Use Compatibility Plan. Impacts would be less than significant and no mitigation is required.

6.1.5 Mitigation Measures

Land use impacts related to build out of the proposed North Park CPU and associated discretionary actions would be less than significant. Thus, no mitigation is required.

6.2 Visual Effects and Neighborhood Character

This section addresses visual effects of the proposed North Park Community Plan Update (CPU) and associated discretionary actions, including potential for impacts on public views, neighborhood character, trees, landform alteration, and light and glare.

6.2.1 Existing Conditions

The existing regulatory framework is summarized in Chapter 5.0 and existing conditions for the North Park CPU area are discussed below.

Visual assets in the North Park CPU area include parks and open space areas and canyons. Figure 6.2-1 shows the location of open space, parks, and canyons within the CPU area and view cones identifying the direction and extent of public views. Public views overlooking the CPU area are available looking to the east from the higher elevation Georgia Street. Other views are available along Upas Street and 28th Street at the boundary of the CPU area with Balboa Park. Canyon areas adjoin a number of the CPU area parks and residential communities, and provide unique opportunities for visual enjoyment.

6.2.1.1 Core and Mixed-Use Corridors

The core and mixed-use corridors areas (Figure 6.2-2) are the commercial areas within the community that provide for the most development activity given their allowable development intensity. Major activity nodes focused around prominent intersections, such as 30th Street/University Avenue and El Cajon Boulevard/ Park Boulevard, contain traditional main street building storefronts that define the public area with pedestrian interaction. Mixed-use corridor areas are the linear commercial areas that connect the core areas and adjacent communities and include less intense retail uses. These areas are focused on the major east–west and north–south streets in the community.

Common elements in core areas and mixed-use corridors include a continuous street wall with small storefronts. The storefronts have ornamentation and geometric patterning across the top of the windows, with entries oriented towards the primary street. Overhangs, awnings, insets, entrance alcoves, and deepened doorways facilitate the transition between interior space and exterior public space. Multiple upper-story stepbacks are provided to provide compatibility transitions between land uses. A higher level of detail is provided at the street level through a concentration of design details on the ground floors.

Map Source: SanGIS

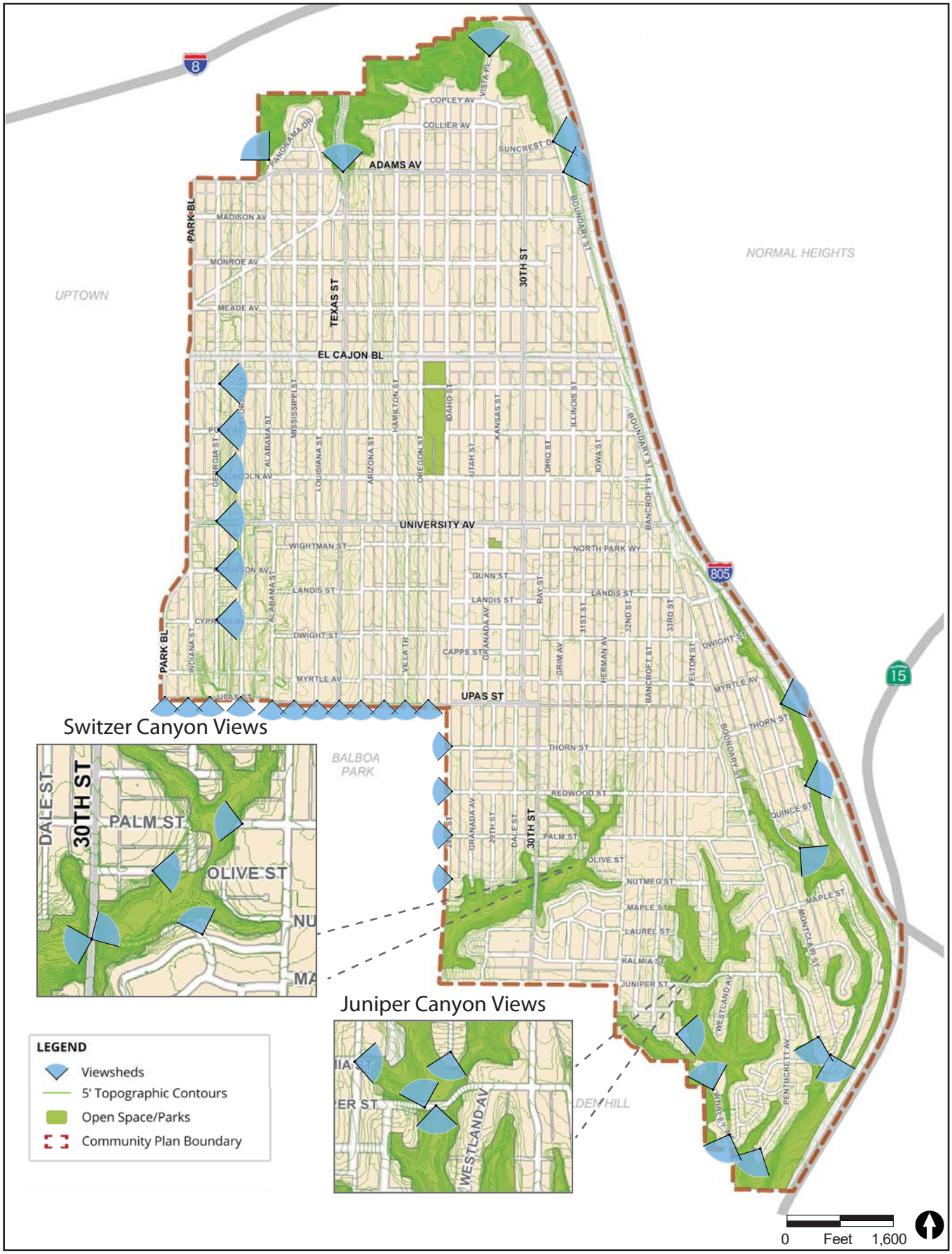


FIGURE 6.2-1

Public Views – North Park

Map Source: SanGIS

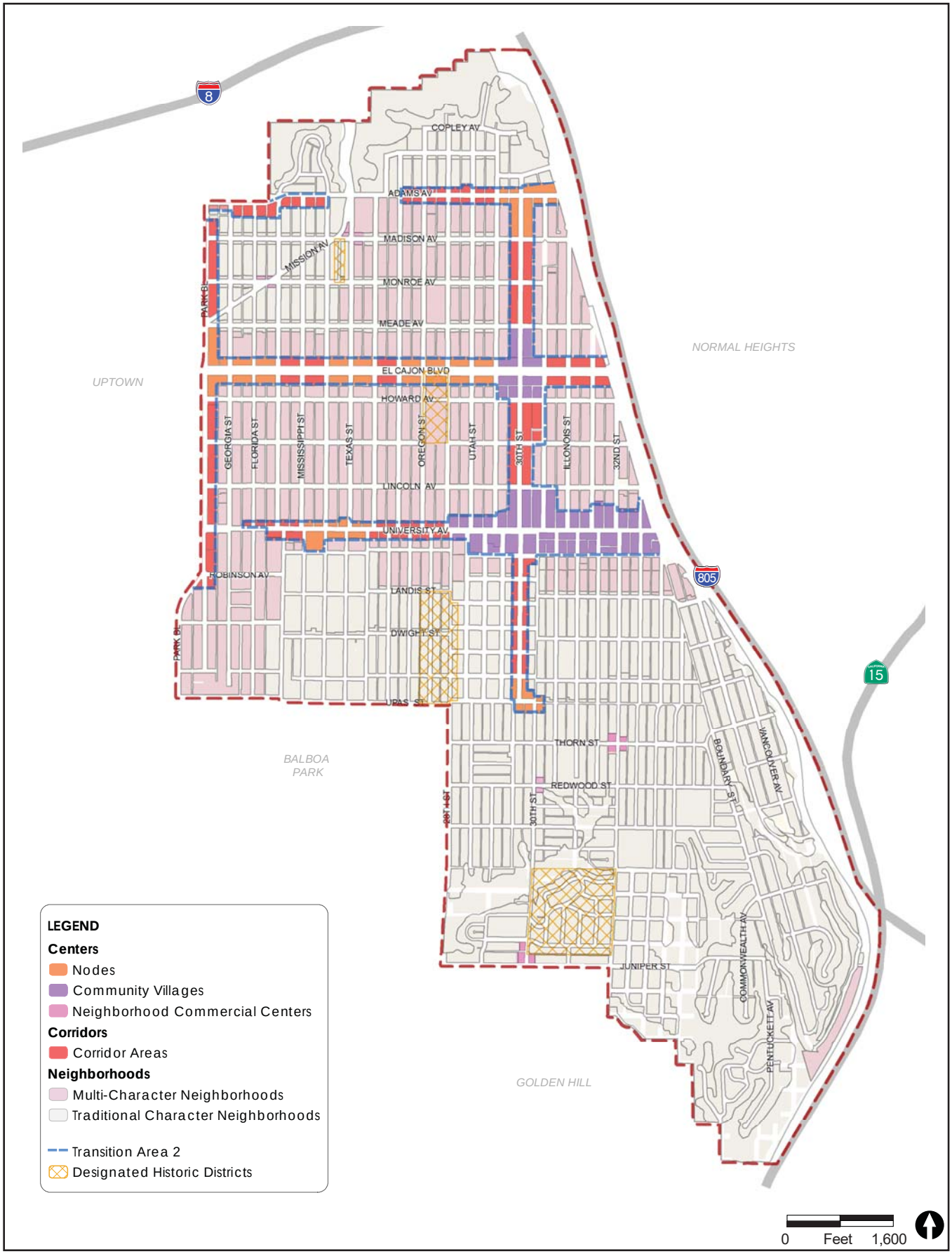


FIGURE 6.2-2

Centers, Corridors, and Neighborhoods – North Park

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North Park contains several community-anchoring buildings and uses that serve as landmarks and central gathering spaces for the community. Additional gateways are identified at major entrances to the community, from freeways and major streets that connect from Downtown, Uptown, Mid-City, and other destinations. Figure 6.2-3 illustrates community gateways in the North Park CPU area. Letters in Figure 6.2-3 are depicted in areas in which the proposed North Park CPU showcases its Urban Design Framework:

A. Vibrant and walkable Community Villages around University Avenue and 30th Street and El Cajon Boulevard and 30th Street;
B. An Arts and Culture District focused along Ray Street;
C. View corridors and view sheds oriented towards natural open spaces;
D. Gateways at key locations in the community that generate a sense of place;
E. A respect and appreciation for the history and culture of the community as expressed in historic districts;
F. A "Green Street" focus on Oregon Street and Pershing Avenue;
G. Commercial nodes located at major intersections of the community;
H. Connections to Balboa Park that provide access through biking and walking; and
I. Neighborhood Centers.

6.2.1.2 Traditional Character Areas

The North Park's proposed Community Plan identifies Traditional Character Neighborhoods as those areas of the community that mostly contain buildings of traditional and historic architectural styles laid on similar lot patterns. A high level of design quality and detailing were largely consistent from the 1910s through the 1950s. Though design and style variations occur within the Traditional Character Neighborhoods, buildings are perceived as being part of the same historic period and are typically of the same scale, have similar setbacks from the street, and use similar materials and design detail. While traditional architectural styles display a great diversity in detailing, these showcase a common sense of scale unifying neighborhoods blocks.

6.2.1.3 Multi-Character Areas

Multi-Character Neighborhoods contain buildings that contrast with North Park's traditional design origins, as well as some remaining buildings that reflect the community's original character. Buildings from the 1960s to 1980s are not especially representative of North Park's character and its traditional architectural and design treatments. North Park's original character is no longer dominant in the Multi-Character Neighborhoods, which have experienced diverse changes in building scale, style, form, and materials that are in contrast with the community's neighborhood origins.

Map Source: SanGIS

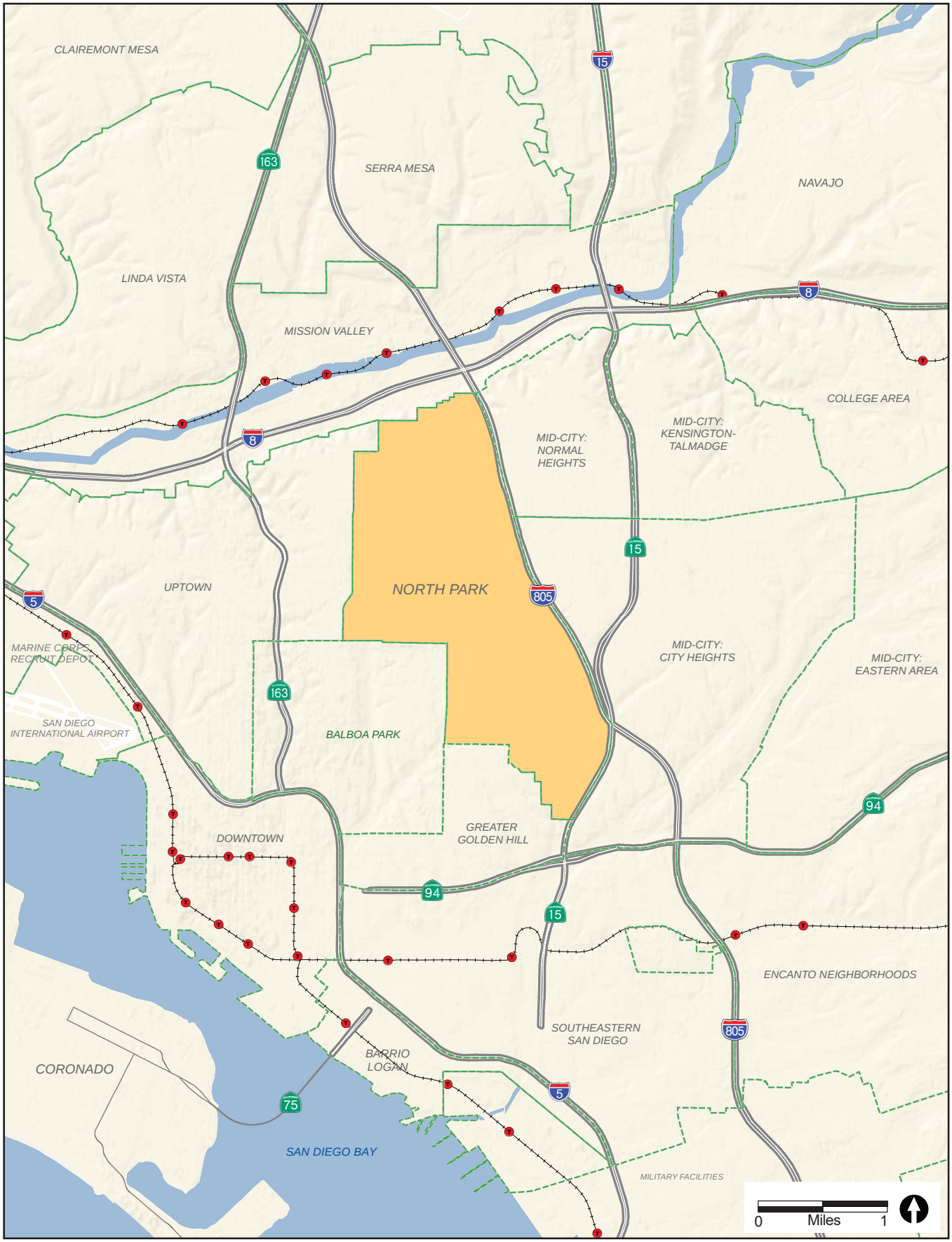


FIGURE 2-3
Geologic Hazards – Golden Hill

6.2.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to visual effects and neighborhood character are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. A significant visual effect and neighborhood character impact would occur if implementation of the proposed North Park CPU and associated discretionary actions would:

1) Result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan:
2) Result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area;
3) The loss of any distinctive or landmark tree(s), or stand of mature trees identified in the community plan;
4) Result in a substantial change in the existing landform; or
5) Create substantial light or glare which would adversely affect daytime and nighttime views in the area.

6.2.3 Impact Analysis

Potential impacts resulting from implementation of the proposed North Park CPU were evaluated based on information from existing conditions assessments of urban design, recreation, and conservation in the North Park CPU area. The assessment was made using data from observation, spatial analysis, and a photographic inventory.

Issue 1 Scenic Vistas or Views

Would the project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?

Due to North Park's sloping topography, public and private views (both near and far) are common. Views are particularly associated with the community's natural scenic amenities of San Diego Bay, Balboa Park, Switzer Canyon, and the 32nd Street and 34th Street canyons. Views from public vantage points (e.g., public streets, trails, and parks) are identified in Figure 6.2-1 and are intended to be protected. The CPU's Section 4.2, Urban Design Element, contains policies that address public views. These policies address the preservation and enhancement of public views and view corridors, restricting development encroachments when a public right-of-way crosses or terminates at parks or designated open space requiring setbacks along view corridors, developing corner lots that allow views, and calling for design of low-scale predominantly residential neighborhoods that do not visually impair access to canyons and other prominent views. Additionally, the North Park CPU's Section 8.3, Sustainability and Conservation Element, contains general policies relative to scenic resources and public views, including protecting views from public vantage points, such as public streets, trails, and parks.

Views of the CPU area from Georgia Street to the east would not be substantially affected by build-out of the CPU area. Existing views are dominated by the developed built environment including major roads, single- and multi-family residential development, and commercial structures. While build-out of the proposed CPU could intensify development within the viewing area from Georgia Street, development would be primarily infill or redevelopment of existing sites and would not result in a substantial change to the existing visual environment. Views toward Balboa Park would not be obstructed by implementation of the CPU, since the proposed CPU and associated discretionary actions would not support development within existing roadways that provide opportunities for viewing into Balboa Park. Development would be focused within existing developed areas as infill or redevelopment and would not obstruct view opportunities to Balboa Park.

While the City of San Diego does not protect private views, public views are protected through the application of policies and regulations related to context-sensitive design, protection of visual access to canyons, and preservation of open space. Policies in Section 4.3, Canyons and Open Space Preservation, of the North Park CPU's Urban Design Element address development along canyons and open space features. These policies would protect scenic vistas along canyons and open space areas by requiring views along public vantage points to be maintained and buildings along canyon edges to conform to hillside topography.

With implementation of applicable policies that would protect public views, build-out of the proposed North Park CPU and associated discretionary actions would have a less than significant impact on scenic views. Furthermore, due to the built-out nature of the North Park community, future development would largely be in-fill development that would fit into the existing urban developed setting and would not resulting in new obstructions to view corridors. With the adherence to existing and proposed policies, impacts to vistas and scenic views would be less than significant.

Issue 2 Neighborhood Character

Would the project result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area?

Build-out of the North Park CPU area would result in intensification of existing land uses; however proposed North Park CPU policies would ensure that future development is consistent with the character of the surrounding area as discussed further below. Within the proposed Enhancement Program areas (see Figure 3-3) increased density would be allowed that could result in an increase in height or bulk compared to existing development. However, much of the CPU area is already developed, and any new development or redevelopment would occur on infill sites. Future development within the CPU area would be required to comply with the City's General Plan, proposed North Park CPU policies, and the Land Development Code (LDC). Additionally, the proposed North Park CPU includes a number of policies that would address compatibility of future development with the character of the community.

The project also proposes removing North Park from the Mid-Cities Planned District Ordinance and application of Citywide zones throughout the CPU area. Proposed design guidelines in the Urban Design Element would be implemented to ensure that development is consistent with neighborhood

character during discretionary review of development projects. The proposed Citywide zones would apply similar development controls to those currently in place under the Planned District Ordinance including land use typologies (e.g., neighborhood commercial, multi-family residential etc.), residential density, and major components of the building envelope such as floor area ratios, heights, and setbacks.

The Urban Design Element of the proposed North Park CPU establishes an urban design framework intended to direct future development in a manner that ensures that the physical attributes of the North Park community would be retained and enhanced by design that responds to the community's particular context: its physical setting, cultural and social amenities, and historical assets. While acknowledging the potential for growth and change, the Urban Design Framework lays the overall groundwork for the remainder of the proposed CPU and highlights the following principles:

- Vibrant and walkable Community Villages around University Avenue and 30th Street and El Cajon Boulevard and 30th Street
- An Arts and Culture District focused along Ray Street.
- View corridors.
- Gateways at key locations in the community.
- A respect and appreciation for the history and culture of the community as expressed in historic districts.
- A "Green Street" focus on Oregon Street and Pershing Avenue.
- Commercial nodes located at major intersections of the community.
- Connections to Balboa Park
- Neighborhood Centers.

The proposed North Park CPU includes specific policies applicable to streetscapes and the public realm that would serve to enhance community character by establishing guidance for development of sidewalks and pedestrian paths, use of street trees, lighting and signage. Public art policies would encourage incorporation of public art into new developments.

The Urban Design Element identifies development design areas based in the built environment: Centers, Corridors, and Neighborhoods, shown in Figure 6.2-2. Centers include nodes, neighborhood centers, and community villages, while Corridors are multiple-use linear commercial areas along the major east–west and north–south streets of the community that sometimes connect with nodes. Centers and Corridors are represented with the mixed-use commercial areas along transit corridors. The proposed North Park CPU Urban Design Element (Section 4.3) identifies transition areas between the mixed-use commercial areas along transit corridors, and adjacent residential areas, identified as Traditional Character and Multi-Character Neighborhoods. Proposed policies for Centers and Corridors allow higher residential density ranges and higher maximum building heights in mixed-use settings than those allowed in adjacent Neighborhoods. Because of these higher residential density ranges and higher maximum building height there is the potential for impacts associated with increased bulk and scale as these changes could impact the neighborhood character.

Policies applicable to future development within the North Park CPU area are specific to the individual character of the area. For example, development within Centers and Corridors would be

subject to design policies that focus on pedestrian-oriented design and mixed-use developments in a highly urbanized setting. In contrast, policies applicable to Neighborhoods focus on enhancing the character of a residential setting and provide specific policies applicable to the Neighborhood setting. Neighborhood policies further differentiate Multi-Character Neighborhoods (areas that contrast with North Park's traditional design origins) from Traditional Neighborhoods that retain the community's original character and provide policies appropriate for each setting.

The proposed North Park CPU Urban Design Element also includes a section that addresses Development Transition Areas where policies would be applied to ensure compatible transitions between higher density areas and lower density areas. Areas subject to transition area policies are generally adjacent to Corridors and Centers as shown in Figure 6.2-2. New development within an area subject to Development Transition Area polices would be required to provide a compatible height transition as shown in Figure 6.2-4. The transition would be required for either front or rear setbacks, whichever is applicable. New development in these areas would also be required to consider dominant architectural style of adjacent buildings including roof forms, architectural features, and materials. These policies would minimize the impact associated with increases in building height, bulk, and scale in those areas that transition from Corridor/Center development to surrounding neighborhoods.

The proposed North Park CPU also includes policies in the proposed Public Facilities Services and Safety Element intended to reduce the visual effect of utilities and other facilities on the streetscape. The visual environment relative to parks and open space would be preserved through implementation of proposed recreation policies and conservation and sustainability policies. The character associated with historical neighborhoods would be preserved through implementation of historic preservation policies (Refer to Section 6.7 of this draft Program Environmental Impact Report for additional discussion of preservation of historical resources and districts).

Future development within the North Park CPU area would be subject to the proposed policies of the CPU and associated zoning regulations and LDC requirements. This regulatory framework would ensure that future development within the CPU area is compatible with the surrounding environment and does not degrade the character or quality of the area. Thus, with implementation of the proposed policies and regulatory framework established in the proposed North Park CPU and associated discretionary actions, the project would result in a less than significant impact to the character of the surrounding area.

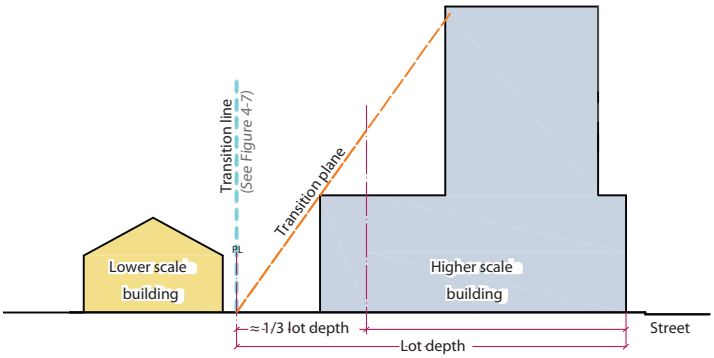
Issue 3 Distinctive or Landmark Trees

Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees identified in the community plan?

There are no distinctive or landmark tree(s) or any stand of mature trees identified in the current Community Plan or the proposed North Park CPU. Although there are street trees present within the Community Plan area that would be subject to City Council Policy 900-19, which provides protection of street trees, unless a tree is designated – which is to be done via either a nomination or a tree removal permit review process and advice from the Community Forrest Advisory Board and Community Planning Groups with the ultimate determination coming from City Staff – there is no

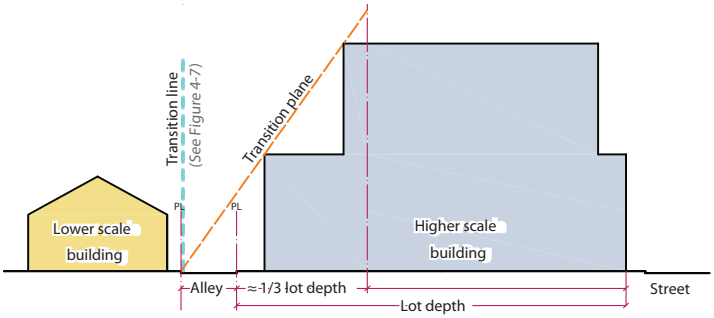
Source: City of San Diego

Transition between buildings sharing property lines



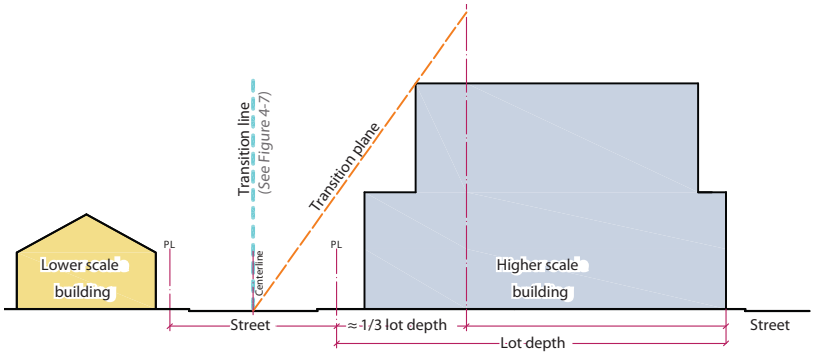
When designing higher scale buildings that share a property line with lower scale buildings a transition plane that does not exceed a 60 degree angle should be incorporated. The transition plane should start from the shared property line to guide higher bulk and scale towards major corridors and farthest away from lower scale buildings. Maximum height is regulated by the applicable zone.

Transition between buildings across an alley



When designing higher scale buildings across an alley from lower scale buildings a transition plane that does not exceed a 60 degree angle should be incorporated. The transition plane should start from the opposite edge of the alley to guide higher bulk and scale towards major corridors and farthest away from lower scale buildings. Maximum height is regulated by the applicable zone.

Transition between buildings across a street



When designing higher scale buildings across a street from lower scale buildings a transition plane that does not exceed a 60 degree angle should be incorporated. The transition plane should start at the street centerline to guide higher bulk and scale towards major corridors and farthest away from lower scale buildings. Maximum height is regulated by the applicable zone.

FIGURE 6.2-4
Transition Plane Guidelines

other protections. None of the street trees located in North Park are listed as being covered by the policy except in the general statement made by the policy itself. The proposed North Park CPU's Section 4.2, Urban Design Element, includes urban forestry polices that would augment the Council Policy. Proposed urban forestry polices would protect existing trees, promote the planting of new trees, and provide guidance as to the types of trees that should be planted. While there are no officially designated distinctive or landmark trees within the CPU area, implementation of the proposed North Park CPU policies would prevent loss of existing mature trees except as required because of tree health or public safety. Thus, implementation of the proposed North Park CPU and associated discretionary actions would not result in the loss of any distinctive or landmark trees or any stand of mature trees and no impact would result.

Issue 4 Landform Alteration

Would the project result in a substantial change in the existing landform?

The landforms in the North Park CPU area include canyons and hillsides that provide open space and visual interest. The majority of the developed area within the CPU area sits atop a flatter mesa while many of the steep canyons remain undeveloped. Existing slopes in the CPU area are either already developed or located in designated parkland or designated as Multi-Habitat Planning Area (MHPA).

While the proposed North Park CPU would allow development and intensification of some areas, development is likely to occur within existing developed areas as infill or as redevelopment of existing developed sites. Existing canyons and slopes are protected from encroachment through their designations as MHPA lands and through environmentally sensitive lands regulations in the LDC. Additionally, the proposed North Park CPU contains policies to ensure development is sensitive to the existing landform. Specifically the proposed North Park CPU Natural Resource Conservation policies within the Sustainability and Conservation Element, and the Canyons and Natural Open Space Preservation policies of the Urban Design Element, provide for the preservation, protection, and restoration of the existing landforms. Because the proposed North Park CPU is an adoption of a plan, development would occur in the future over an extended time period, and specific grading quantities associated with future development are presently unknown. However, implementation of the proposed North Park CPU would not involve mass grading since the proposed North Park CPU area is already nearly fully developed with urban uses. Therefore, impacts to existing landform from implementation of the proposed North Park CPU and associated discretionary actions would be less than significant.

Issue 5 Light or Glare

Would the project create substantial light or glare which would adversely affect daytime or nighttime views in the area?

The North Park community is a built-out urban community. Sources of light currently include those typical of an urban community, such as building lighting for residential, commercial, and institutional land uses, roadway infrastructure lighting, and signage. Future development implemented in accordance with the proposed North Park CPU and associated discretionary actions would

necessitate the use of additional light fixtures and may contribute to existing conditions of light and glare. New light sources may include residential and non-residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas.

The proposed North Park CPU contains policies that encourage the use of lighting in public areas, on streets and walkways, in alleys, on building facades, and in parking lots for both public safety and aesthetic purposes. Proposed policies also encourage the integration of lighting design into new development design, discourage unnecessary glare and light spillage, and require light sources to be compatible with the surrounding environment. The MHPA occurs in the North Park community within canyon areas. In accordance with the Multiple Species Conservation Program (MSCP) Adjacency Guidelines, lighting of all development areas adjacent to the MHPA would be directed away from the MHPA.

Outdoor lighting is regulated by Section 142.0740 of the LDC. The purpose of the City's outdoor lighting regulations is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building Regulations, where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. No direct-beam illumination is permitted to leave the premises. The City's lighting regulations require that most outdoor lighting be turned off between 11:00 P.M. and 6:00 A.M. with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 P.M., adequate lighting for public safety). Any future development would be required to comply with the applicable outdoor lighting regulations of the City of San Diego Municipal Code.

With respect to glare, Section 142.0730 of the City's LDC limits to a maximum of 50 percent of the exterior of a building that may be composed of reflective material that has a light reflectivity factor greater than 30 percent. Additionally, per Section 142.0730(b), reflective building materials are not permitted where the it is determined that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space.

With requisite implementation of the proposed North Park CPU, General Plan and the LDC regulations, as well as requirements of the MHPA Adjacency Guidelines, lighting and glare impacts would be less than significant.

Cumulative Impacts

Future growth within the North Park CPU area in combination with development within surrounding areas including the Golden Hill and Uptown CPU areas has the potential to cumulatively impact the visual environment through the design and location of future buildings. However, the cumulative visual impact of build-out of the three communities would not result in a cumulatively significant impact since the CPU areas are already urbanized and include existing development of the type that would be further developed under the CPUs.

Future development in accordance with the CPUs is likely to take place on infill sites in previously developed locations. Similar to the policy discussion above for the proposed North Park CPU, each of the surrounding CPUs contain policies to ensure that any new development is consistent with the existing aesthetic and character of the respective setting and CPU area. Proposed policies address consistency in setbacks, height and bulk, landscaping, design, historic character, and natural features such as canyons and hillsides. The North Park, Golden Hill and Uptown CPUs contain policies to preserve, protect, and restore existing landforms. Proposed policies also seek to prevent or reduce potential impacts that may arise from the proximity of conflicting land uses.

Cumulative light and glare impacts are addressed through compliance with the Municipal Code and proposed CPU policies that ensure lighting is directed downward, away from MHPA areas, and would not affect day or nighttime views. Thus, based on the existing urbanized character of the CPU areas, existing regulations addressing protection of trees, lighting, and landform alteration and proposed CPU policies that would ensure implementation of the CPUs are consistent with the surrounding character and protects views, cumulative impacts would be less than significant.

6.2.4 Significance of Impacts

Issue 1 Scenic Vistas or Views

The implementation of the proposed North Park CPU and associated discretionary actions would not result in substantial obstruction of public views from view corridors, designated open space areas, public roads, or public parks. New development within the community would take place within the constraints of the existing urban framework and development pattern, thereby not impacting view corridors. The policies of the proposed North Park CPU and associated discretionary actions would enhance public view corridors through use of setbacks and design improvements along major roadways within the CPU area. Therefore, public view impacts would be less than significant, and no mitigation would be required.

Issue 2 Neighborhood Character

While implementation of the proposed North Park CPU and associated discretionary actions would result in intensification of the CPU area, the proposed North Park CPU includes a number of policies that would ensure development is context sensitive and enhances the character of the surrounding area. Where there are transitions between residential and mixed-use or commercial areas, specific transition standards would be applied to minimize adverse impacts. Thus, neighborhood character impacts would be less than significant, and no mitigation would be required.

Issue 3 Distinctive or Landmark Trees

The implementation of the proposed North Park CPU and associated discretionary actions would not result in the loss of any distinctive or landmark trees or any stand of mature trees; therefore no impacts would result.

Issue 4 Landform Alteration

Implementation of the proposed North Park CPU and associated discretionary actions would not result in significant landform alteration impacts based on the developed nature of the CPU area and compliance with existing regulations in place that would protect steep slope and canyon areas from development. The proposed North Park CPU includes policies that would protect and preserve existing landforms (i.e., canyons and open space areas). In addition, future development would be evaluated to ensure compliance with the City's grading ordinance and significance thresholds related to grading quantities. Therefore, impacts would be less than significant and no mitigation would be required.

Issue 5 Light and Glare

Impacts relative to lighting and glare would be less than significant. No mitigation would be required.

6.2.5 Mitigation Measures

Impacts of build-out of the proposed North Park CPU and associated discretionary actions would be less than significant with the application of applicable City General Plan, proposed North Park CPU policies, and LDC requirements. Thus, no mitigation is required.

6.3 Transportation and Circulation

Kimley-Horn and Associates. Inc. conducted the Uptown, North Park, and Golden Hill Community Plan Update (CPU) Traffic Impact Study (June 2015). The report is included in Appendix B-1 to this PEIR. Additionally, a supplemental letter report was prepared for the project to provide an updated analysis that included additional density added to the project after the June 2015 report was finalized. This supplemental report dated March 15, 2016 prepared by Kimley-Horn and Associates is included as Appendix B-2 of this PEIR and is titled North Park and Uptown Updated Residential Densities Traffic Evaluation Summary of Findings for the Cluster Community Plan Update. The results of these reports pertinent to the North Park community are presented in this section. Additionally, Kimley-Horn and Associates, Inc. prepared an Uptown, North Park, and Golden Hill Community Plan Update Mobility Study for Buildout Conditions. That report is included in Appendix C to this EIR and discussed in this section, as applicable.

6.3.1 Existing Conditions

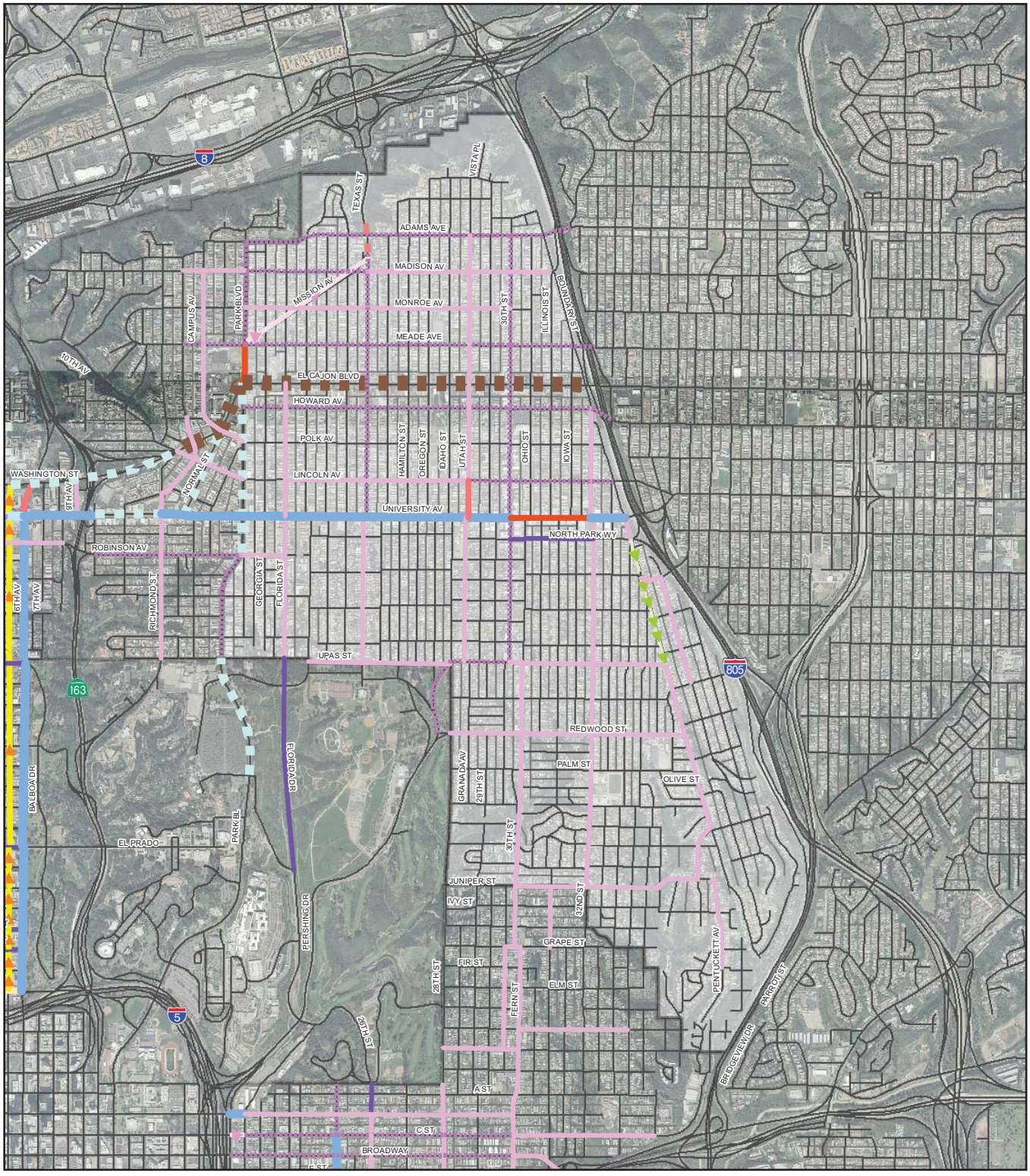
The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. This section summarizes the existing roadway circulation network, daily and peak-hour traffic volumes, and operations at the North Park CPU study area intersections and roadway and freeway segments.

6.3.1.1 Roadway Network

The following section provides a description of the existing study area streets within the North Park community. The portions of the roadways described are intended to reflect the areas within the community and may not reflect the entirety of the roadway. Functional classifications are based on field observations performed during preparation of the *Traffic Impact Study*. Figure 6.3-1 illustrates the existing roadway classifications for North Park. The City of San Diego Bicycle Master Plan (City BMP) identifies several bicycle facilities in the community, as noted in the roadway descriptions below.

30th Street functions as a north-south 2-lane collector with a curb to curb width of 50 feet between Juniper Street and Upas Street and a 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between Upas Street and Adams Avenue. 30th Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. The City BMP proposes the entirety of 30th Street as either a Class II (Bike Lanes) or Class III (Bike Route) facility. 30th Street is the main roadway connecting the North Park community with the Golden Hill community.

Map Source: Kimley Horn



- 1 Lane Collector (one-way)
- 2 Lane Collector (Multi-family, commercial-industrial fronting)
- 2 Lane Collector (One-Way)
- 2 Lane Collector (continuous left-turn lane)
- 2 Lane Collector (no fronting property)
- 3 Lane Collector (no center lane)
- 3 Lane Collector (one-way w/ one lane dedicated for bike facility)
- 3 Lane Collector (one-way)
- 3 Lane Collector (two-way)
- 3 Lane Major Arterial
- 4 Lane Collector
- 4 Lane Collector (no center lane)
- 4 Lane Major Arterial
- 6 Lane Major Arterial

FIGURE 6.3-1

Existing Functional Street Classifications – North Park

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32nd Street functions as a north-south 2-lane collector with a curb to curb width of 45 feet between Juniper Street and Howard Avenue. 32nd Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

Adams Avenue functions as an east-west 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between Park Boulevard and Interstate 805 (I-805). Angle parking is available on the north side of the street from Mission Cliff Drive to Park Boulevard. Parallel parking is available along the other sections, the posted speed limit is 25 mph. The City BMP proposes Adams Avenue as either a Class II (Bike Lanes) or Class III (Bike Route) facility between Park Boulevard and communities east of North Park.

Boundary Street functions as a 2-lane collector with a curb to curb width of 40 feet between Maple Street and Myrtle Avenue and a one-way southbound 1-lane collector with a curb to curb width of 25 feet between Myrtle Avenue and North Park Way, with I-805 off-ramps at North Park Way. Boundary Street is lined with sidewalks and curbs with parallel parking available on both sides of the street for this portion. North of North Park Way, Boundary Street parallels I-805 as a 2-lane collector and provides sidewalk and curb on the west side of the street only. The posted speed limit is 25 mph. It is currently functioning at its adopted plan ultimate classification. The City BMP proposes Boundary Street as either a Class II (Bike Lanes) or Class III (Bike Route) facility between Lincoln Avenue and Landis Street and as a Class III facility from Landis Street to its southern terminus where a Class I (Bike Path) is proposed to provide connections with C Street and Ash Street.

Commonwealth Avenue is a short segment functioning as a 2-lane collector with a curb to curb width of 35 feet between Boundary Street and Juniper Street. Commonwealth Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. The City BMP proposes Commonwealth Avenue as a Class III (Bike Route) facility between Boundary Street and Juniper Street.

El Cajon Boulevard functions as an east-west 6-lane major between Park Boulevard and I-805. El Cajon Boulevard provides access to I-805 northbound and southbound. It is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 35 mph. The City BMP proposes El Cajon Boulevard as a Class II (Bike Lanes) facility between Park Boulevard and east to adjacent communities, with the option of a Class III (Bike Route) between Park Boulevard and Utah Street.

Florida Street functions as a north-south 2-lane collector with a curb to curb width of 40 feet between Upas Street and El Cajon Boulevard. Florida Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. It continues south into Balboa Park and changes name to Florida Drive. The posted speed limit is 25 mph. The City BMP proposes Florida Street as a Class II (Bike Lanes) facility between Upas Street and University Avenue, and as a Class III (Bike Route) facility between University Avenue and Adams Avenue.

Howard Avenue functions as an east-west 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between Park Boulevard and 32nd Street. Howard Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. It continues east over I-805 and changes name to Orange Avenue. The posted speed limit is 25 mph and it is currently a

designated Class III (Bike Route) facility. The City BMP proposes Howard Avenue as a dedicated Bicycle Boulevard between Georgia Street and east beyond the community boundary.

Juniper Street functions as an east-west 2-lane collector with a curb to curb width of 50 feet between 29th Street and Pentuckett Avenue. Juniper Street is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the north side of the street west of 30th Street. Parallel parking is available along the other sections. The posted speed limit is 25 mph. The City BMP proposes Juniper Street as a Class III (Bike Route) between 30th Street and Commonwealth Avenue.

Landis Street functions as a 2-lane collector with a curb to curb width of 50 feet between Boundary Street and Nile Street and provides access across I-805. Landis Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. The City BMP proposes Landis Street as a Bicycle Boulevard between Alabama Street and Utah Street, as a Class III (Bike Route) facility between Utah Street and Boundary Street, joining the existing bike lanes east of Boundary Street.

Lincoln Avenue functions as an east-west 2-lane collector with a curb to curb width of 50 feet between Washington Street and Utah Street, and a 2-lane collector with a continuous two-way left-turn lane and a curb to curb width of 50 feet between Utah Street and I-805. Lincoln Avenue is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the north side of the street between Hamilton Street and Idaho Street. Parallel parking is available along the other sections. The posted speed limit is 25 mph west of 30th Street and 30 mph east of 30th Street. The City BMP proposes Lincoln Avenue as a Class II (Bike Lanes) facility between its western terminus and Park Boulevard, and as a Class III (Bike Route) facility between Park Boulevard and University Avenue with an option of a Class II (Bike Lanes) facility between 30th Street and Boundary Street.

Madison Avenue functions as an east-west 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between Park Boulevard and Texas Street and as a 2-lane collector with a curb to curb width of 50 feet between Texas Street and Boundary Street. Madison Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

Meade Avenue functions as an east-west 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between Park Boulevard and I-805. Meade Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph west of 30th Street and 30 mph east of 30th Street. The City BMP proposes Meade Avenue as a dedicated Bicycle Boulevard between Maryland Street and the community boundary to the east.

Mission Avenue runs diagonally through the grid network and functions as a one-way 2-lane collector with a curb to curb width of 50 feet between Park Boulevard and Texas Street. Mission Avenue is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the north side of the street between Mississippi Avenue and Louisiana Street. Parallel parking is available along the other sections. The posted speed limit is 25 mph.

Monroe Avenue functions as an east-west 2-lane collector with a curb to curb width of 50 feet between Maryland Street and Ohio Street. Monroe Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

Nile Street functions as a 2-lane collector with a curb to curb width of 50 feet between Thorn Street and Landis Street. Nile Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

North Park Way functions as an east-west 2-lane collector between Utah Street and Boundary Street. North Park Way has a curb to curb width of 50 feet between Utah Street and Ray Street and 40 feet between Ray Street and Boundary Street. North Park Way is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on both sides of the street west of 30th Street. Parallel parking is available along the other sections. The posted speed limit is 25 mph.

Pentuckett Avenue functions as a north-south 2-lane collector with a curb to curb width of 40 feet between Juniper Street and the south end of the road near State Route 15 (SR-15). Pentuckett Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

Redwood Street functions as an east-west 2-lane collector with a curb to curb width of 40 feet between Pershing Drive and Boundary Street. Redwood Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

Texas Street functions as a north-south 2-lane collector with a curb to curb width of 40 feet between Upas Street and University Avenue, a 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between University Avenue and Mission Avenue, and transitioning to a 3-lane major with a curb to curb width of 60 feet between Mission Avenue and Interstate 8 (I-8). Texas Street is lined with sidewalks and curbs with parallel parking available on both sides of the street between Upas Street and Madison Street. From Madison Street to I-8, Texas Street runs through a canyon area; bike lanes are provided on both sides and sidewalk is provided on the west side. The posted speed limit is 25 mph between Upas Street and Madison Avenue, and 40 mph between Madison Avenue and I-8. The City BMP proposes the entirety of Texas Street as a Class II (Bike Lanes).

University Avenue functions as an east-west 4-lane collector with no center lane and a curb to curb width of 50 feet between Park Boulevard and Boundary Street, expect between 30th Street and 32nd Street where it is a 3-lane collector (2 eastbound, 1 westbound) with a curb to curb width of 50 feet. University Avenue is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 30 mph between Park Boulevard and Utah Street and 25 mph between Utah Street and Boundary Street. The City BMP proposes University Avenue as a Class II (Bike Lanes) facility for all segments within the community boundaries with the option of a Class III (Bike Route) between Park Boulevard and Florida Street.

Upas Street functions as an east-west 2-lane collector with a curb to curb width of 40 feet between Alabama Street and Pershing Drive and between 30th Street and Boundary Street, and as a 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between Pershing Drive

and 30th Street. No sidewalks or curb are provided on the south side. East of Pershing Drive, Upas Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. Between Alabama Street and Pershing Drive, Upas Street borders Balboa Park to the north. Upas Street is classified as a Class III bicycle facility. The City BMP proposes Upas Street as a Class II (Bike Lanes) facility between Alabama Street and 30th Street with the option of a Class III (Bike Route) facility between Alabama Street and Pershing Avenue. Upas Street west of Morley Field Drive and 30th Street, and as a Class III facility between 30th Street and Boundary Street.

Utah Street functions as a north-south 2-lane collector with bike lanes and a curb to curb width of 50 feet between Upas Street and Copley Avenue, with a 3-lane section between Lincoln Avenue and University Avenue. Utah Street is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the west side of the street between North Park Way and Gunn Street. Parallel parking is available along the other sections. The posted speed limit is 25 mph along Utah Street, except between University Avenue and El Cajon Boulevard where it increased to 30 mph.

6.3.1.2 Roadway Segment Conditions

In order to determine the impacts on the study area roadway segments, Table 6.3-1 has been developed by the City of San Diego and is used as a reference. The segment traffic volumes under LOS E as shown in this table are considered at capacity because at LOS E the v/c Ratio is equal to 1.0.

Table 6.3-1
City of San Diego Roadway Segment Capacity and Level of Service

Road Class	Lanes	A	B	C	D	E
Freeway	8	60,000	84,000	120,000	140,000	150,000
Freeway	6	45,000	63,000	90,000	110,000	120,000
Freeway	4	30,000	42,000	60,000	70,000	80,000
Expressway	6	30,000	42,000	60,000	70,000	80,000
Prime Arterial (two-way)	6	25,000	35,000	50,000	55,000	60,000
Major Arterial (two-way)	6	20,000	28,000	40,000	45,000	50,000
Major Arterial (two-way)	4	15,000	21,000	30,000	35,000	40,000
Major Arterial (two-way)	3	11,250	15,750	22,500	26,250	30,000
Major Arterial (one-way)	3	12,500	16,500	22,500	25,000	27,500
Major Arterial (one-way)	2	10,000	13,000	17,500	20,000	22,500
Collector (two-way)	4	10,000	14,000	20,000	25,000	30,000
Collector (No center lane)	4	5,000	7,000	10,000	13,000	15,000
(Continuous left-turn lane)	2					
Collector (No fronting property)	2	4,000	5,500	7,500	9,000	10,000
Collector (two-way)	3	7,500	10,500	15,000	17,500	20,000
Collector (no center turn lane)	3	4,000	5,500	7,500	10,000	11,500
Collector (Commercial/Industrial fronting)	2	2,500	3,500	5,000	6,500	8,000
Collector (Multi-family)	2	2,500	3,500	5,000	6,500	8,000
Collector (one-way)	3	11,000	14,000	19,000	22,500	26,000
Collector (one-way with one lane dedicated for bike facility)	3	7,500	9,500	12,500	15,000	17,500
Collector (one-way)	2	7,500	9,500	12,500	15,000	17,500
Collector (one-way)	1	2,500	3,500	5,000	6,250	7,500
Sub-Collector (Single family)	2	–	–	2,200	–	–

Notes:
The volumes and the average daily level of service listed above are only intended as a general planning guideline.
Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.
Capacities for any classification not identified in the sources noted below were developed based on interpolation from similar classifications.

Sources: City of San Diego Traffic Impact Study Manual, Table 2, Page 8, July 1998.
City of San Diego Planning Department Mobility Section

Based on planning-level analysis using ADT volumes, it is estimated that all roadway segments within the North Park community function at an acceptable LOS D or better, except for the segments listed below. The segments listed below have volumes near or above their existing capacity, resulting in periods of congestion.

- 30th Street between Upas Street and Redwood Street (LOS F)
- 30th Street between Redwood Street and Juniper Street (LOS F)
- 32nd Street between Myrtle Avenue and Upas Street (LOS E)

- Adams Avenue between 30th Street and West Mountain View Drive (LOS F)
- Boundary Street between University Avenue and North Park Way (LOS F)
- El Cajon Boulevard between Illinois Street and I-805 Ramps (LOS E)
- Texas Street between Adams Avenue and Mission Avenue (LOS E)
- Texas Street between Mission Avenue and El Cajon Boulevard (LOS F)
- University Avenue between Park Boulevard and Florida Street (LOS F)
- University Avenue between Florida Street and Texas Street (LOS F)
- University Avenue between Texas Street and Oregon Street (LOS F)
- University Avenue between Oregon Street and Utah Street (LOS F)
- University Avenue between Utah Street and 30th Street (LOS F)
- University Avenue between 30th Street and Illinois Street (LOS F)
- University Avenue between Illinois Street and Iowa Street (LOS F)
- University Avenue between Iowa Street and 32nd Street (LOS F)
- University Avenue between 32nd Street and Boundary Street (LOS F)
- Upas Street between Alabama Street and Texas Street (LOS E)
- Upas Street between Texas Street and Pershing Road (LOS E)

Figure 6.3-2 displays the existing roadway segment ADT volumes for the North Park CPU area.

Map Source: SanGIS

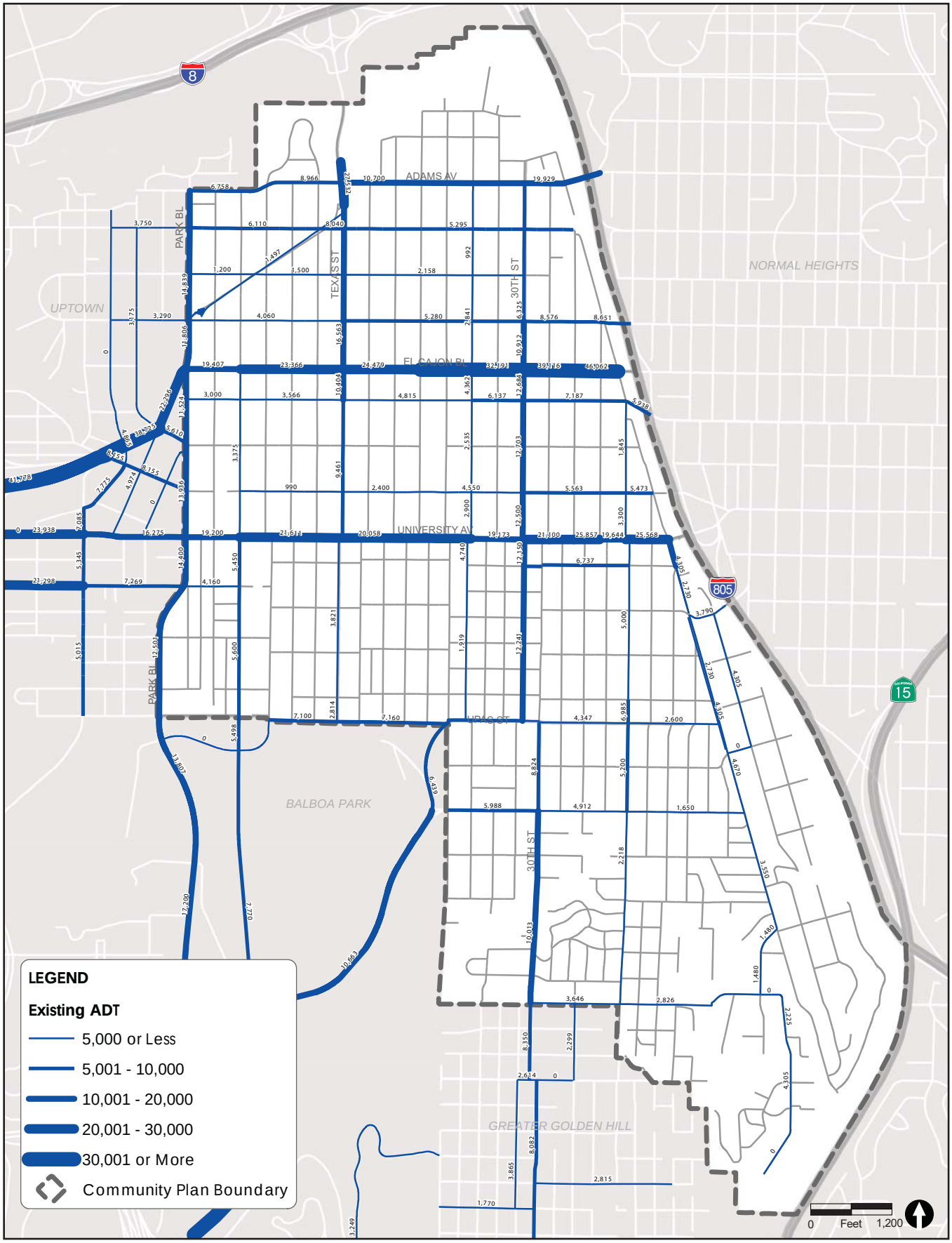


FIGURE 6.3-2

Existing Roadway Segment ADT Volumes – North Park

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6.3.1.3 Intersection Conditions

The TIS (Appendix B-1) includes a LOS analysis for the study intersections within the North Park community under Existing Conditions. Level of service (LOS) for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in additional to the stop delay. The level of service for unsignalized intersections is determined by the computed or measured control delay and is defined for each minor movement. The criteria for the various levels of service designations for signalized and unsignalized intersections are given in Table 6.3-2.

Table 6.3-2
Level of Service Criteria for Intersections

LOS	Signalized (Control Delay) (sec/veh)[a]	Unsignalized (Control Delay) (sec/veh)[b]	Description
A	≤10.0	≤10.0	Operations with very low delay and most vehicles do not stop.
B	>10.0 and ≤20.0	>10.0 and ≤15.0	Operations with good progression but with some restricted movement.
C	>20.0 and ≤35.0	>15.0 and ≤25.0	Operations where a significant number of vehicles are stopping with some backup and light congestion
D	>35.0 and ≤55.0	>25.0 and ≤35.0	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines.
E	>55.0 and ≤80.0	>35.0 and ≤50.0	Operations where these is significant delay, extensive queuing, and poor progression.
F	>80.0	>50.0	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

Source:
[a]2000 Highway Capacity Manual, Chapter 16, Page 2, Exhibit 16-2
[b]2000 Highway Capacity Manual, Chapter 17, Page 2, Exhibit 17-2

Within the City of San Diego, all signalized and unsignalized intersections are considered deficient if they operate at LOS E or F. All North Park CPU study area intersections currently operate at LOS D or better during both peak periods, except for the following intersections:

- Madison Avenue & Texas Street (LOS E – AM peak)
- El Cajon Boulevard & Texas Street (LOS F – PM peak)
- El Cajon Boulevard & I-805 SB Ramps (LOS F – PM peak)
- University Avenue & Texas Street (LOS E – PM peak)

At the intersection of Madison Avenue and Texas Street, there is insufficient capacity in the single left-turn lane for the number of vehicles making the eastbound left-turn movement from Madison Avenue to Texas Street in the AM peak hour. At the intersection of El Cajon Boulevard and Texas Street, the southbound movement does not have adequate time to pass all the vehicles through the intersection given the existing timing plan. At the intersection of El Cajon Boulevard and I-805 SB Ramps, the slowdown is primarily caused by the southbound right-turn movement having to merge with traffic on El Cajon Boulevard. Delays at the merge point can affect the speeds on the ramp and the overall intersection operations. At the intersection of University Avenue and Texas Street, there is a pedestrian-only phase and split phasing for the northbound and southbound movements. Vehicles coming from all directions at this intersection and the current intersection timing cannot keep the delays down for every movement, especially when pedestrians are using the intersection at the same time.

6.3.1.4 Freeway Segments

Table 6.3-3 identifies Caltrans criteria used to rate freeway segment operations based on a LOS scale from A to F. Freeway volumes were obtained from Caltrans. Table 6.3-4 displays the LOS analysis results for the study freeway segments under existing conditions. As shown in the table, the freeway segments surrounding the North Park CPU area have volumes that exceed the capacity during peak hours. In general, the failing segments are those that move traffic away from the cluster communities in the morning and towards the cluster communities in the afternoon.

Interstate 5 shows LOS E or F in the northbound direction at each of the segments except between Washington Street and Pacific Highway during the AM peak. In the PM peak, LOS E or F occurs from First Avenue to Sixth Avenue and from State Route 163 (SR-163) to State Route 94 (SR-94), both in the southbound direction.

Interstate 8 shows LOS E or F at each of the study segments in both peak periods. The failing LOS shows up in the westbound direction during the AM peak and in the eastbound direction during the PM peak.

State Route 15 shows LOS E in the southbound direction during both the AM and PM peaks between I-805 and SR-94.

Interstate 805 shows LOS E or F in one direction each of the segments in the AM peak. From I-8 to Adams Avenue, the deficient direction is northbound, and for segments from El Cajon Boulevard to SR-15, the deficient direction is southbound. During the PM peak, the deficient segments are southbound from I-8 to Adams Avenue and northbound from El Cajon Boulevard to University Avenue.

State Route 94 shows LOS E or F in the westbound direction during the AM peak and in the eastbound direction in the PM peak.

State Route 163 shows LOS E or F in the southbound direction from Washington Street to I-5 during the AM peak and in the northbound direction from I-5 to Washington Street during the PM peak. In addition, the segment of SR-163 from Quince Drive to I-5 in the southbound direction is LOS F in the PM peak.

Table 6.3-3
Level of Service Criteria for Freeway Segment Analysis

LOS	v/c ratio	Congestion/Delay	Traffic Description
A	<0.41	None	Free Flow
B	0.41 – 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, and very limited freedom to maneuver
E	0.93 – 1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor
F_0	1.01 – 1.25	Considerable 0-1 hour delay	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection
F_1	1.26 – 1.35	Severe 1-2 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go
F_2	1.36 – 1.45	Very severe 2-3 hour delay	Extremely heavy congestion, very long queues
F_3	>1.46	Extremely severe 3+ hour delay	Gridlock

Notes:
Source: Caltrans Guidelines, 1992

Table 6.3-4
Existing Freeway Segment Level of Service

Freeway Segment	Direction	# of Lanes	Capacity (A)	ADT (B)	2-way Peak Hour Volume (B)	D (Directional Split)	Peak-Hour Volume (C)	V/C Ratio	LOS
AM PEAK									
I-5									
Old Town Ave to Washington St	NB	4 M + 1 A	9,200	196,000	15,600	0.560	8,736	0.95	**E**
	SB	4 M + 1 A	9,200			0.440	6,864	0.75	C
Washington St to Pacific Highway	NB	4 M	8,000	148,000	12,000	0.560	6,720	0.84	D
	SB	4 M	8,000			0.440	5,280	0.66	C
First Ave to Sixth Ave	NB	4 M + 1 A	9,200	201,000	15,500	0.750	11,625	1.26	**F_1**
	SB	5 M + 1 A	11,200			0.250	3,875	0.35	A
SR-163 to SR-94	NB	5 M + 1 A	11,200	210,000	16,200	0.750	12,150	1.08	**F_0**
	SB	5 M + 1 A	11,200			0.250	4,050	0.36	A
SR-94 to Imperial Ave	NB	4 M + 1 A	9,200	164,000	12,700	0.750	9,525	1.04	**F_0**
	SB	4 M + 1 A	9,200			0.250	3,175	0.35	A

Table 6.3-4
Existing Freeway Segment Level of Service

Freeway Segment	Direction	# of Lanes	Capacity (A)	ADT (B)	2-way Peak Hour Volume (B)	D (Directional Split)	Peak-Hour Volume (C)	V/C Ratio	LOS
I-8									
Hotel Circle (W) to Hotel Circle (E)	WB	4 M + 1 A	9,200	208,000	16,500	0.570	9,405	1.02	**F_0**
	EB	4 M	8,000			0.430	7,095	0.89	D
Mission Center Rd to Qualcomm Wy	WB	4 M + 1 A	9,200	224,000	17,900	0.570	10,203	1.11	**F_0**
	EB	4 M + 1 A	9,200			0.430	7,697	0.84	D
I-805 to SR-15	WB	4 M + 1 A	9,200	242,000	19,100	0.650	12,415	1.35	**F_1**
	EB	4 M + 1 A	9,200			0.350	6,685	0.73	C
SR-15									
I-805 to SR-94	NB	3 M + 1 A	7,200	96,000	8,900	0.430	3,827	0.53	B
	SB	2 M + 1 A	5,200			0.570	5,073	0.98	**E**
I-805									
I-8 to Adams Ave	NB	4 M + 1 A	9,200	192,000	15,900	0.730	11,607	1.26	**F_1**
	SB	5 M + 1 A	11,200			0.270	4,293	0.38	A
El Cajon Blvd to University Ave	NB	4 M	8,000	171,000	14,600	0.330	4,818	0.60	B
	SB	4 M + 1 A	9,200			0.670	9,782	1.06	**F_0**
University Ave to SR-15	NB	4 M + 1 A	9,200	169,000	13,000	0.330	4,290	0.47	B
	SB	4 M + 1 A	9,200			0.670	8,710	0.95	**E**
SR-94									
25th St to 28th St	WB	4 M	8,000	123,000	10,700	0.730	7,811	0.98	**E**
	EB	4 M	8,000			0.270	2,889	0.36	A
28th St to 30th St	WB	4 M	8,000	130,000	12,000	0.730	8,760	1.10	**F_0**
	EB	4 M	8,000			0.270	3,240	0.41	A
Broadway to SR-15	WB	4 M	8,000	144,000	13,300	0.730	9,709	1.21	**F_0**
	EB	4 M + 1 A	9,200			0.270	3,591	0.39	A
SR-163									
I-8 to Washington St	NB	3 M + 1 A	7,200	126,000	10,100	0.410	4,141	0.58	B
	SB	3 M + 1 A	7,200			0.590	5,959	0.83	D
Washington St to Robinson Ave	NB	2 M	4,000	96,000	7,800	0.410	3,198	0.80	C
	SB	2 M	4,000			0.590	4,602	1.15	**F_0**
Quince Dr to I-5	NB	2 M	4,000	108,000	10,100	0.350	3,535	0.88	D
	SB	2 M	4,000			0.650	6,565	1.64	**F_2**

Table 6.3-4
Existing Freeway Segment Level of Service

Freeway Segment	Direction	# of Lanes	Capacity (A)	ADT (B)	2-way Peak Hour Volume (B)	D (Directional Split)	Peak-Hour Volume (C)	V/C Ratio	LOS
PM PEAK									
I-5									
Old Town Ave to Washington St	NB	4 M + 1 A	9200	196,000	15,600	0.460	7,176	0.78	C
	SB	4 M + 1 A	9200			0.540	8,424	0.92	D
Washington St to Pacific Highway	NB	4 M	8000	148,000	12,000	0.460	5,520	0.69	C
	SB	4 M	8000			0.540	6,480	0.81	D
First Ave to Sixth Ave	NB	4 M + 1 A	9200	201,000	15,500	0.640	9,920	1.08	**F_0**
	SB	5 M + 1 A	11200			0.360	5,580	0.50	B
SR-163 to SR-94	NB	5 M + 1 A	11200	210,000	16,200	0.640	10,368	0.93	**E**
	SB	5 M + 1 A	11200			0.360	5,832	0.52	B
SR-94 to Imperial Ave	NB	4 M + 1 A	9200	164,000	12,700	0.640	8,128	0.88	D
	SB	4 M + 1 A	9200			0.360	4,572	0.50	B
I-8									
Hotel Circle (W) to Hotel Circle (E)	WB	4 M + 1 A	9200	208,000	16,500	0.450	7,425	0.81	D
	EB	4 M	8000			0.550	9,075	1.13	**F_0**
Mission Center Rd to Qualcomm Wy	WB	4 M + 1 A	9200	224,000	17,900	0.450	8,055	0.88	D
	EB	4 M + 1 A	9200			0.550	9,845	1.07	**F_0**
I-805 to SR-15	WB	4 M + 1 A	9200	242,000	19,100	0.430	8,213	0.89	D
	EB	4 M + 1 A	9200			0.570	10,887	1.18	**F_0**
SR-15									
I-805 to SR-94	NB	3 M + 1 A	7200	96,000	8,900	0.430	3,827	0.53	B
	SB	2 M + 1 A	5200			0.570	5,073	0.98	**E**
I-805									
I-8 to Adams Ave	NB	4 M + 1 A	9200	192,000	15,900	0.340	5,406	0.59	B
	SB	5 M + 1 A	11200			0.660	10,494	0.94	**E**
El Cajon Blvd to University Ave	NB	4 M	8000	171,000	14,600	0.600	8,760	1.10	**F_0**
	SB	4 M + 1 A	9200			0.400	5,840	0.63	C
University Ave to SR-15	NB	4 M + 1 A	9200	169,000	13,000	0.600	7,800	0.85	D
	SB	4 M + 1 A	9200			0.400	5,200	0.57	B

Table 6.3-4
Existing Freeway Segment Level of Service

Freeway Segment	Direction	# of Lanes	Capacity (A)	ADT (B)	2-way Peak Hour Volume (B)	D (Directional Split)	Peak-Hour Volume (C)	V/C Ratio	LOS
SR-94									
25th St to 28th St	WB	4 M	8000	123,000	10,700	0.300	3,210	0.40	A
	EB	4 M	8000			0.700	7,490	0.94	**E**
28th St to 30th St	WB	4 M	8000	130,000	12,000	0.300	3,600	0.45	B
	EB	4 M	8000			0.700	8,400	1.05	**F_0**
Broadway to SR-15	WB	4 M	8000	144,000	13,300	0.300	3,990	0.50	B
	EB	4 M + 1 A	9200			0.700	9,310	1.01	**F_0**
SR-163									
I-8 to Washington St	NB	3 M + 1 A	7200	126,000	10,100	0.620	6,262	0.87	D
	SB	3 M + 1 A	7200			0.380	3,838	0.53	B
Washington St to Robinson Ave	NB	2 M	4000	96,000	7,800	0.620	4,836	1.21	**F_0**
	SB	2 M	4000			0.380	2,964	0.74	C
Quince Dr to I-5	NB	2 M	4000	108,000	10,100	0.540	5,454	1.36	**F_2**
	SB	2 M	4000			0.460	4,646	1.16	**F_0**

Notes:
Bold values indicate freeway segments operating at LOS E or F.
M=Main Lane; A= Auxiliary Lane.
(a) The capacity is calculated as 2,000 ADT per main lane and 1,200 ADT per auxiliary lane
(b) Traffic volumes provided by Caltrans (2008)
(c) Peak-hour volume calculated by: (2-way Peak-Hour Volume)*(D)

6.3.1.5 Freeway Ramp Metering

Ramp volumes were obtained from intersection turning movements data when applicable, or from Caltrans volumes. Table 6.3-5 displays the queuing analysis results for the ramps in the study area that are currently metered. The table compares the peak hour demand at the on-ramp with the current meter rate. As shown in the table, the meter rate adequately controls the expected demand without excess queuing (in excess of 15 minutes) for all ramp meters in the North Park CPU area.

Table 3.6-5
Existing Freeway Ramp Metering

On-Ramp	Peak Period	Meter Rate[1] (Veh/Hr)	Demand[2] (Veh/Hr)	Excess Demand (Veh/Hr)	Average Delay (Min)
Interstate 5					
Washington St to I-5 NB	AM	996	1020	24	1.4
	PM	996	1034	38	2.3
India St to I-5 NB	AM	996	915	0	0.0
	PM	996	1066	70	4.2
Hawthorn St to I-5 NB	AM	996	454	0	0.0
	PM	996	842	0	0.0
Hancock St to I-5 SB	AM	Ramp not metered in the AM peak			
	PM	1140	1287	147	7.7
Kettner Blvd to I-5 SB	AM	Ramp not metered in the AM peak			
	PM	498	269	0	0.0
Fifth Ave to I-5 SB	AM	Ramp not metered in the AM peak			
	PM	996	1087	91	5.5
Interstate 8					
NB Texas St to I-8 EB	AM	Ramp not metered in the AM peak			
	PM	498	465	0	0.0
SB Texas St to I-8 EB	AM	Ramp not metered in the AM peak			
	PM	1140	866	0	0.0
Interstate 805					
El Cajon Blvd to I-805 NB	AM	1140	860	0	0.0
	PM	Ramp not metered in the PM peak			
University Ave to I-805 NB	AM	1140	998	0	0.0
	PM	Ramp not metered in the PM peak			
State Route 94					
28th St to SR-94 WB	AM	534	100	0	0.0
	PM	Ramp not metered in the PM peak			
32nd St/Broadway to SR-94 WB	AM	570	99	0	0.0
	PM	Ramp not metered in the PM peak			
25th St to SR-94 EB	AM	Ramp not metered in the AM peak			
	PM	960	785	0	0.0
28th St to SR-94 EB	AM	Ramp not metered in the AM peak			
	PM	960	732	0	0.0
32nd St/Broadway to SR-94 EB	AM	Ramp not metered in the AM peak			
	PM	570	464	0	0.0
State Route 163					
Washington St to SR-163 SB	AM	498	373	0	0.0
	PM	Ramp not metered in the PM peak			

Notes:
[1] Meter rate is the assumed peak hour capacity expected to be processed through the ramp meter (using Caltrans fast rate)
[2] Demand is the peak hour demand using the on-ramp

6.3.1.6 Alternative Transportation Facilities

a. Transit

North Park has local and rapid bus routes along their major commercial corridors of University Avenue, El Cajon Boulevard, Adams Avenue, and 30th Street, and recently implemented ~~BRT~~ Rapid service along Park Boulevard. The bus system is highly used in this area. These streets are all popular roadways for other modes of travel as well, so buffered, separate transit facilities are being considered to provide efficiency and safety for all modes of travel.

Planned transit services within the North Park community, identified in SANDAG's San Diego Forward: The Regional Plan (~~the 2050 RTP~~RP) include light rail transit (LRT), streetcar, ~~BRT~~Rapid transit as shown on Figure 6.3-3.

b. Bicycle Facilities

The City of San Diego Bicycle Master Plan (BMP) established guidance on achieving an ideal bicycle environment throughout the City. Similarly, a key focus of the San Diego Regional Bicycle Plan (RBP) prepared by SANDAG is to develop an interconnected network of bicycle corridors to improve the connectivity and quality of bicycle facilities and their supporting facilities. While these documents look at citywide and regional goals, the same focuses to develop quality facilities are applied to the local street networks in the community of North Park.

North Park has traditionally been one of San Diego's most active bicycling communities. Grid street patterns north of Upas Street allow for numerous connections on streets with moderate traffic volumes. These street patterns extend to the east, allowing for connections to Mid-City, San Diego State University, and La Mesa. Several street connections occur between North Park and Uptown, but automobile traffic is heavy which discourages more novice cyclists from venturing on roads such as University Avenue and Washington Street.

North Park residents that commute to work in downtown San Diego using bicycles primarily utilize Pershing Drive and Florida Street, which have bicycle lanes through Balboa Park connecting to the business district in downtown. Texas Street has bicycle lanes that provide for the only bicycle facility connection that currently exists between Mission Valley and the mesa to the south. This route is steep and a long climb, presenting challenges to most cyclists. South of Upas Street, bicycle travel is constrained somewhat due to canyons and I-805. To this point, south of Landis Street, there are no connections to the east (for bicycles, cars, or pedestrians), and bicyclists must navigate around the canyons.

Map Source: SanGIS

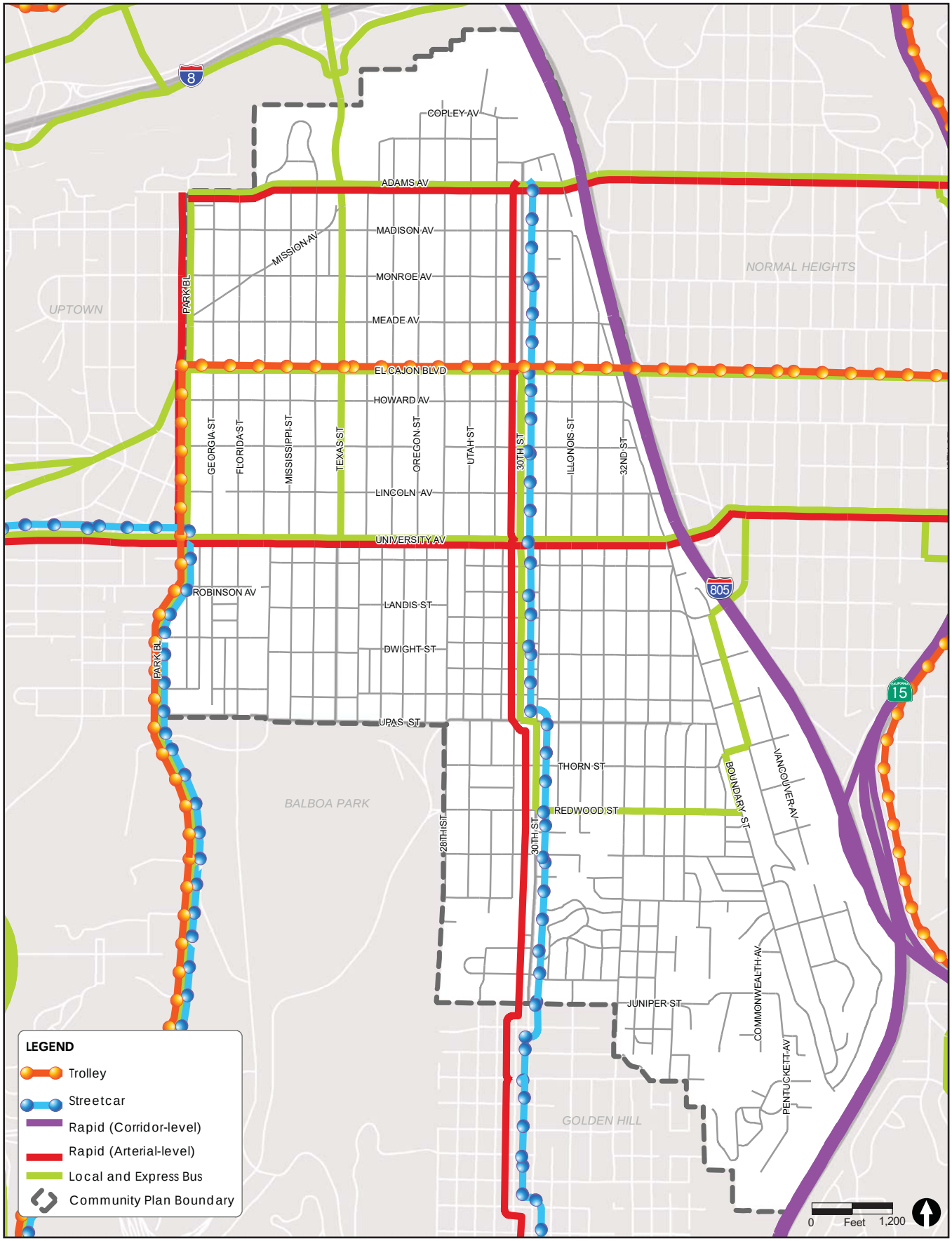


FIGURE 6.3-3

Planned Transit Facilities – North Park

Consistent with the San Diego Regional Bike Plan, SANDAG's regional bicycle facilities for the North Park Community Plan area are shown on Figure 6.3-4. SANDAG's North Park and Mid-City Bikeways project consists of six segments totaling 13 miles of bike boulevards and protected bikeways (including features such as traffic-calming elements, safer crossings, and streetscape enhancements) within the North Park and Mid-City communities. These facilities are planned for construction between 2017 and 2018. The bicycle facilities will make it safer and easier for people to bike to more places within and between the two communities. The SANDAG ~~RTP~~RP includes guidance to implement bicycle boulevards on Meade and Howard Avenues. Existing and planned bicycle facilities identified within the proposed CPU are shown on Figure 6.3-5.

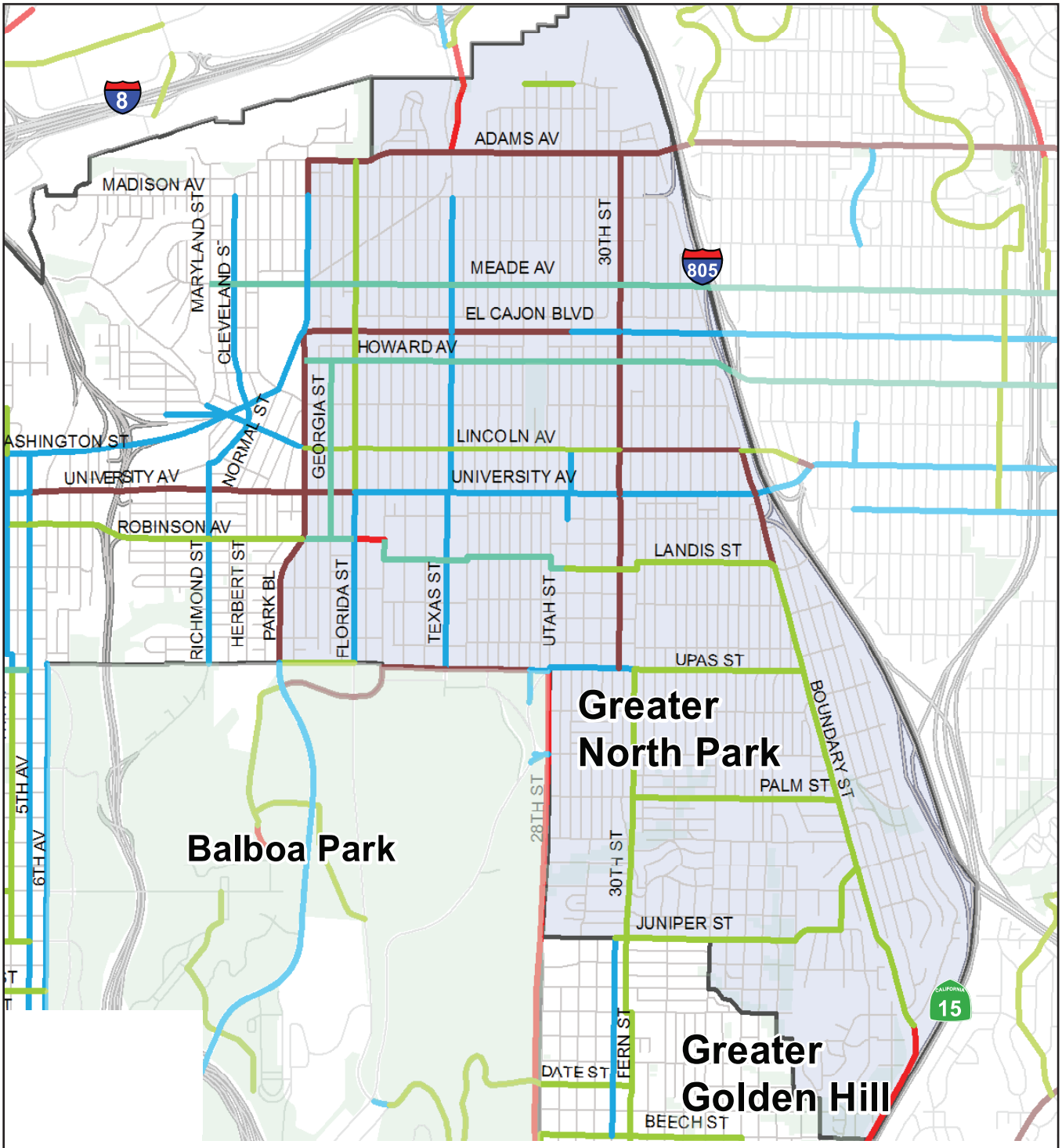
c. Pedestrian Facilities

Adams Avenue, 30th Street, and a portion of North Park Way are designated as Corridor Sidewalk areas on the City of San Diego's Pedestrian Master Plan. University Avenue is a combination of District and Corridor Sidewalk. An array of Connector Sidewalks are spread throughout this portion of the community. There are several connections provided over I-805 to areas to the east. Texas Street provides the only connection further north to the Mission Valley area. Since the North Park community is set up on a mesa, the connection down to Mission Valley is steep and can be difficult for pedestrians to traverse.

The western border of the North Park community where it meets the Uptown community has integrated pedestrian facilities that help the two communities maintain pedestrian paths of travel. Park Boulevard separates the communities but also serves high levels of pedestrian activity. This is partly due to the seamless transition between the communities. In the southern portion of the community, most pedestrian activity stays around the 30th Street corridor, with the surrounding residential areas seeing less activity. Switzer Canyon severs many of the connections near the southern border of the community, with 30th and 32nd Streets being the largest connections. Redwood Street and Upas Street provide pedestrian connections to Balboa Park, which hosts various trails and recreation activities.

With the majority of the North Park community laid out in a grid-like street network with a good mix of land uses, North Park has fairly high pedestrian activity throughout the community. The only area in the community that does not score high on the pedestrian priority model is the southeastern portion of the community where its residential neighborhoods are faced with steeper terrains and streets disconnected by canyons.

Map Source: KTU+A



The identified regional bicycle facility recommended classifciations are subject to change pending further project level evaluation demonstrating implementation feasibility of these facilities.

FIGURE 6.3-4

Regional Bicycle Plan – North Park

Map Source: SanGIS

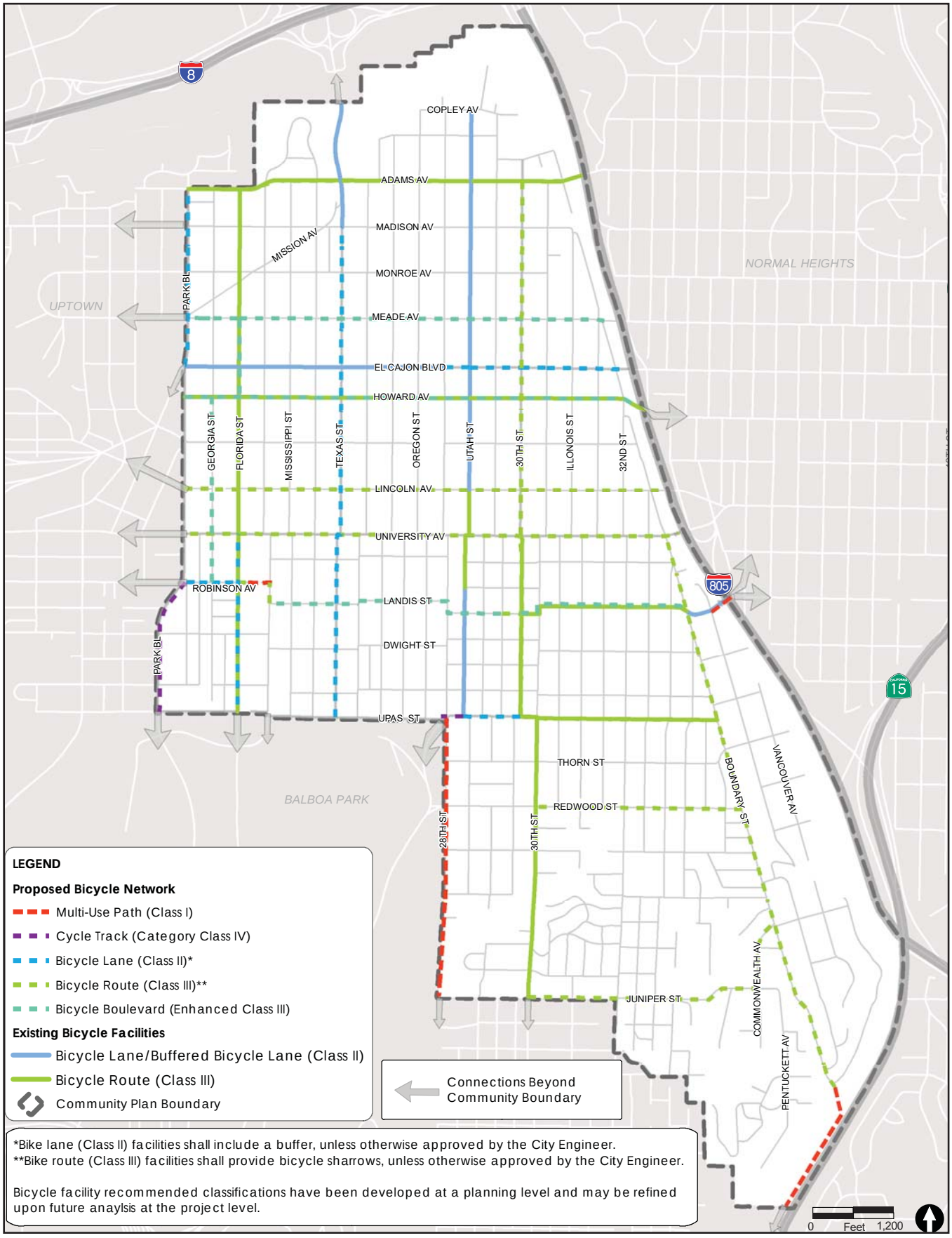


FIGURE 6.3-5

Existing and Planned Bicycle Networks – North Park

6.3.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to Transportation and Traffic are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. A significant impact could occur if implementation of a proposed CPU would:

1) Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps;
2) Conflict with adopted policies, plans, or programs supporting alternative transportation.

The City of San Diego and Caltrans have developed acceptable threshold standards to determine the significance of project impacts to intersections, roadway segments, freeway segments, and freeway ramp metering. At intersections, the measurement of effectiveness (MOE) is based on allowable increases in delay. Along roadway segments and freeway segments, the MOE is based on allowable increases in the volume-to-capacity (v/c) ratio. At a freeway ramp meter, the MOE is based on allowable increases in delay, measured in minutes. These thresholds, applicable to the analysis of transportation facilities (Issue 1) are summarized in Table 6.3-6 and further detailed below.

Table 6.3-6
Significance Criteria for Facilities in Study Area

Facility	Measures of Effectiveness (MOE)	Significance Threshold[1]
Intersection	Seconds of Delay	> 2.0 seconds at LOS E or > 1.0 second at LOS F
Roadway Segment	ADT, v/c ratio	> 0.02 at LOS E or > 0.01 at LOS F
Freeway Segment	v/c ratio	> 0.01 at LOS E or > 0.005 at LOS F
Freeway Ramp Meter	Minutes of delay per vehicle	> 2.0 minutes for freeway segments operating at LOS E, and >1.0 minutes for freeway segments operating at LOS F. The criteria only apply for ramp meters where the delay without project is 15 minutes or higher.

v/c = volume to capacity ratio
LOS = Level of Service
[1]Applies only when the facilities operates at LOS E or F
Source: City of San Diego Significance Determination Thresholds, 2011; Kimley Horn Traffic Impact Study, Appendix B-1

a. Signalized and Unsignalized Intersections

LOS F is not acceptable for any approach leg except for side streets on an interconnected arterial system. If vehicle trips from a project cause an intersection approach leg to operate at LOS F, except

in the cases of side streets on an interconnected arterial system, this would be considered a significant project traffic impact. At intersections that are expected to operate at LOS E or F without the project, the allowable increase in delay is two seconds at LOS E and one second at LOS F with the addition of the project. If vehicle trips from a project cause the delay at an intersection to increase by more than the allowable threshold, this would be considered a significant project impact. Also, if the project causes an intersection that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant project impact.

b. Roadway Segments

For roadway segments that are forecasted to operate at LOS E or F with the project, the allowable increase in v/c ratio is 0.02 at LOS E and 0.01 at LOS F. If vehicle trips from a project cause the v/c ratio to increase by more than the allowable threshold, this would be considered a significant project traffic impact. Also, if the project causes a street segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

Where the roadway segment operates at LOS E or F, if the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the project; and a peak hour HCM arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the project; then the project impacts would be less than significant. If analysis shows either the intersections or segment under the peak hour HCM analysis do not operate acceptably, the project impacts would be significant.

In certain instances, mitigation may not be required even if a roadway segment operates at LOS E or LOS F. In such cases the following three conditions must all be met:

1. The roadway is built to its ultimate classification per the adopted Community Plan;
2. The intersections on both ends of the failing segment operate at an acceptable LOS; and
3. An HCM arterial analysis indicates an acceptable LOS on the segment.

c. Freeway Segments

For freeway segments that are forecasted to operate at LOS E or F with the project, the allowable increase in v/c ratio is 0.01 at LOS E and 0.005 at LOS F. If vehicle trips from a project cause the v/c ratio to increase by more than the allowable threshold, this would be considered a significant project traffic impact. Also, if the project causes a freeway segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

d. Freeway Ramp Metering

Ramp metering is a means of controlling the volume of traffic entering the freeway with the goal of improving the traffic operations and flow on the freeway main lanes. Freeway ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at the given location. The excess demand, if any, forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Substantial queues and delays can form where demand significantly exceeds the meter rate. This approach assumes a static meter

rate throughout the course of the peak hour. However, Caltrans has indicated that the meter rates are continually adjusted based on the level of traffic using the on-ramp. To the extent possible, the meter rate is set such that the queue length does not exceed the available storage, smooth flows on the freeway mainline is maintained, and there is no interference to arterial traffic.

If vehicle trips from a project cause a metered ramp with a delay of 15 minutes per vehicle or higher to increase its delay by more than two minutes per vehicle, this would be considered a significant project traffic impact if the freeway segment operates at LOS E or F.

6.3.3 Impact Analysis

Issue 1 Traffic Circulation

Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?

In order to assess potential impacts, this section provides a description of future community build-out conditions for the North Park community. Due to the nature of the project being an update to the North Park CPU with no specific development project being proposed at this time, the analysis provided in this section is cumulative in nature. The analysis considers the existing conditions within the North Park CPU and evaluates impacts to applicable facilities within the North Park CPU area after build-out of the CPU. Since the analysis is looking at impacts over the long term, through 2035, projected traffic volume increases associated with development in neighboring communities (Golden Hill and Uptown) is included within the analysis.

a. Build-out Traffic Volumes

The future community build-out conditions were developed based on proposed North Park CPU build-out land use and network assumptions within the North Park Community Plan area and superimposed on SANDAG 2035 regional model. Model adjustments were incorporated to provide consistency with vehicular traffic counts collected for the proposed North Park CPU and expected traffic patterns within the North Park, Golden Hill and Uptown CPU areas. These adjustments included the following:

- For roadway segments where the difference between the City's calibrated 2008 model and the actual count data collected between 2006 and 2010 exceeded ten percent or 2,000 daily vehicles, the difference was subtracted or added to the Year 2035 forecast model to adjust the future volume based on the discrepancy noted between the City's traffic model volumes and count data. For roadway segments that have existing daily volumes less than 5,000, no adjustments were applied to the future model volumes.

The resulting daily traffic volumes for the North Park community for build-out are presented in Figure 6.3-6.

Map Source: Kimley Horn

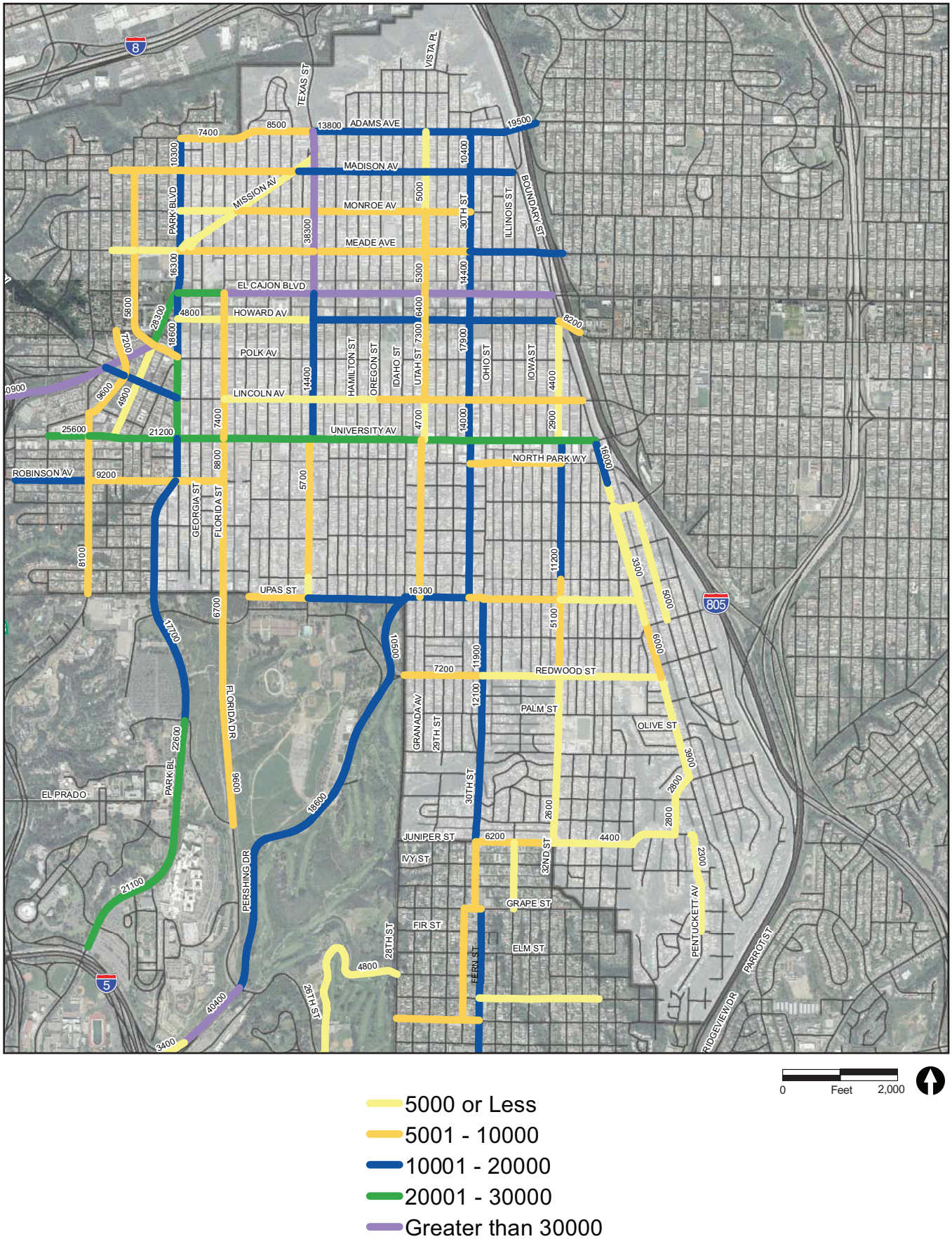


FIGURE 6.3-6

Build-out Proposed Land Use Roadway Segment ADT Volumes – North Park

b. Intersection Analysis

Table 6.3-7 displays the LOS analysis results for the study intersections using existing lane configuration and the future peak-hour traffic volumes. As shown in Table 6.3-7, the proposed North Park CPU and associated discretionary actions would have a cumulative traffic related impact at eight of the 11 study intersections.

Impact 6.3-1 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of Madison Avenue and Texas Street in the AM and PM peak hours.

Impact 6.3-2 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of El Cajon Boulevard and 30th Street in the PM peak hour.

Impact 6.3-3 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of El Cajon Boulevard and I-805 SB Ramps in the PM peak hour.

Impact 6.3-4 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of University Avenue and 30th Street in the PM peak hour.

Impact 6.3-5 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of University Avenue and Boundary Street in the PM peak hour.

Impact 6.3-6 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of University Avenue and I-805 NB Ramps in the AM and PM peak hours.

Impact 6.3-7 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of North Park Way/I-805 SB Ramps and Boundary Street/33rd Street in the PM peak hour.

Impact 6.3-8 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of Upas Street and 30th Street in the AM and PM peak hours.

Table 6.3-7
Build-out Summary of Intersection Analysis – North Park

Intersection		Traffic control	Peak hour	Existing		Build-out			
				Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ(c)	Significant?
1	Madison Ave & Texas St	Signal	AM	77.4	E	144.4	F	67.0	YES
			PM	**34.7**	**C**	**63.9**	**E**	**29.2**	**YES**
2	El Cajon Blvd & Texas St	Signal	AM	35.9	D	38.9	D	3.0	NO
			PM	**106.8**	**F**	**100.3**	**F**	**-6.5**	**NO**
3	El Cajon Blvd & 30th St	Signal	AM	26.0	C	31.4	C	5.4	NO
			PM	**50.2**	**D**	**84.4**	**F**	**34.2**	**YES**
4	El Cajon Blvd & I-805 SB Ramps	Signal	AM	18.4	B	24.3	C	5.9	NO
			PM	**80.9**	**F**	**119.9**	**F**	**39.0**	**YES**
5	El Cajon Blvd & I-805 NB Ramps	Signal	AM	27.9	C	32.3	C	4.4	NO
			PM	**19.2**	**B**	**25.3**	**C**	**6.1**	**NO**
6	University Ave & Texas St	Signal	AM	19.5	B	35.2	D	15.7	NO
			PM	**72.7**	**E**	**48.1**	**D**	**-24.6**	**NO**
7	University Ave & 30th St	Signal	AM	25.0	C	26.9	C	1.9	NO
			PM	**49.2**	**D**	**73.7**	**E**	**24.5**	**YES**
8	University Ave & Boundary St	Signal	AM	23.0	C	30.2	C	7.2	NO
			PM	**42.1**	**D**	**60.4**	**E**	**18.3**	**YES**
9	University Ave & I-805 NB Ramps	Signal	AM	29.0	C	58.8	E	29.8	YES
			PM	**35.6**	**D**	**93.9**	**F**	**58.3**	**YES**
10	North Park Way/I-805 SB Ramps & Boundary St/33rd St	All-Way Stop	AM	18.1	C	20.7	C	2.6	NO
			PM	**10.6**	**B**	**45.2**	**E**	**34.6**	**YES**
11	Upas St & 30th St (W)	All-Way Stop	AM	24.4	C	40.1	E	15.7	YES
			PM	**25.9**	**D**	**54.8**	**F**	**28.9**	**YES**

Notes:
Bold values indicate intersections operating at LOS E or F.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 180 seconds.
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a one-way or two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the 2000 Highway Capacity Manual and performed using Synchro 8
(c) Δ = change in delay. Delay in Build-out – Existing Delay

c. Roadway Segment Analysis

Table 6.3-8 displays the LOS analysis results for roadway segments within the North Park community using existing roadway classifications and the future peak-hour traffic volumes for those roadways. As shown in Table 6.3-8, the proposed North Park CPU and associated discretionary actions would have a cumulative traffic related impact on 43 of the 95 roadway segments within the study area. Where impacts occur on consecutive segments of a roadway, these impacts have been combined for clarity.

Impact 6.3-9 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to four consecutive street segments of 30th Street from Meade Avenue to University Avenue.

Impact 6.3-10 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive segments of 30th Street from North Park Way to Juniper Street.

Impact 6.3-11 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to two consecutive segments of 32nd Street from University Avenue to Upas Street.

Impact 6.3-12 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to Adams Avenue from Texas Street to 30th Street.

Impact 6.3-13 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to Boundary Street from University Avenue to North Park Way.

Impact 6.3-14 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to El Cajon Boulevard from Oregon Street to Utah Street.

Impact 6.3-15 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to two consecutive segments of El Cajon Boulevard from 30th Street to I-805 Ramps.

Impact 6.3-16 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive segments of Florida Street from El Cajon Boulevard to Upas Street.

Impact 6.3-17 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive street segments of Howard Avenue from Texas Street to 32nd Street.

Impact 6.3-18 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to Madison Avenue from Texas Street to Ohio Street.

Impact 6.3-19 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to four consecutive street segments Meade Avenue from Park Boulevard to Iowa Street

Impact 6.3-20 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to Redwood Street from 28th Street to 30th Street.

Impact 6.3-21 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to four consecutive street segments of Texas Street from Adams Avenue to University Avenue.

Impact 6.3-22 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to University Avenue from Park Boulevard to Florida Street.

Impact 6.3-23 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to six consecutive segments of University Avenue from Texas Street to Boundary Street.

Impact 6.3-24 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive segments of Upas Street from Alabama Street to 30th Street.

Impact 6.3-25 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to Utah Street from Howard Avenue to Lincoln Avenue.

Impact 6.3-26 The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to Utah Street from North Park Way to Upas Street.

Table 6.3-8 Build-out Summary of Roadway Segment Analysis – North Park											
			Existing			Build-out					
Roadway Segment	Roadway Functional Classification	LOS E Capacity	ADT	V/C Ratio[1]	LOS	ADT	V/C Ratio[1]	LOS	Δ in ADT	Δ in V/C	Significant?
30th Street											
Adams Ave to Meade Ave	2-lane Collector (continuous left-turn lane)	15,000	6,325	0.422	B	10,400	0.693	D	4,075	0.271	NO
Meade Ave to El Cajon Blvd	2-lane Collector (continuous left-turn lane)	15,000	10,912	0.727	D	14,400	0.960	**E**	3,488	0.233	**YES**
El Cajon Blvd to Howard Ave	2-lane Collector (continuous left-turn lane)	15,000	12,684	0.846	D	13,445	0.896	**E**	761	0.050	**YES**
Howard Ave to Lincoln Ave	2-lane Collector (continuous left-turn lane)	15,000	12,703	0.847	D	18,833	1.256	**F**	6130	0.409	**YES**
Lincoln Ave to University Ave	2-lane Collector (continuous left-turn lane)	15,000	12,500	0.833	D	14,739	0.983	**E**	2239	0.150	**YES**
University Ave to North Park Way	2-lane Collector (continuous left-turn lane)	15,000	12,150	0.810	D	12,500	0.833	D	350	0.023	NO
North Park Way to Upas St	2-lane Collector (continuous left-turn lane)	15,000	12,241	0.816	D	16,500	1.100	**F**	4,259	0.284	**YES**
Upas St to Redwood St	2-lane Collector (no center lane)	8,000	8,824	1.103	**F**	11,900	1.488	**F**	3,076	0.385	**YES**
Redwood St to Juniper St	2-lane Collector (no center lane)	8,000	10,013	1.252	**F**	12,100	1.513	**F**	2,087	0.261	**YES**
32nd Street											
Howard Ave to Lincoln Ave	2-lane Collector (no center lane)	8,000	1,845	0.231	A	4,400	0.550	C	2,555	0.319	NO
Lincoln Ave to University Ave	2-lane Collector (no center lane)	8,000	3,300	0.413	B	3,300	0.413	B	0	0.000	NO
University Ave to Myrtle Ave	2-lane Collector (no center lane)	8,000	5,000	0.625	D	11,200	1.400	**F**	6,200	0.775	**YES**
Myrtle Ave to Upas St	2-lane Collector (no center lane)	8,000	6,985	0.873	**E**	7,900	0.988	**E**	915	0.115	**YES**
Upas St to Redwood St	2-lane Collector (no center lane)	8,000	5,200	0.650	D	5,200	0.650	D	0	0.000	NO
Redwood St to Juniper St	2-lane Collector (no center lane)	8,000	2,218	0.277	A	2,600	0.325	B	382	0.048	NO
Adams Avenue											
Park Blvd to Alabama St	2-lane Collector (continuous left-turn lane)	15,000	6,758	0.451	B	7,400	0.493	C	642	0.042	NO
Alabama St to Texas St	2-lane Collector (continuous left-turn lane)	15,000	8,966	0.598	C	8,966	0.598	C	0	0.000	NO
Texas St to 30th St	2-lane Collector (continuous left-turn lane)	15,000	10,700	0.713	D	13,800	0.920	**E**	3,100	0.207	**YES**
30th St to W Mountain View Dr	2-lane Collector (continuous left-turn lane)	15,000	19,929	1.329	**F**	19,929	1.329	**F**	0	0.000	NO
Boundary Street											
University Ave to North Park Way	2-lane Collector (no center lane)	8,000	12,620	1.578	**F**	16,000	2.000	**F**	3,380	0.422	**YES**
North Park Way to Myrtle Ave	1-lane Collector (one-way)	7,500	2,730	0.364	B	3,300	0.440	B	570	0.076	NO
Myrtle Ave to Redwood St	2-lane Collector (no center lane)	8,000	4,670	0.584	C	6,000	0.750	D	1,330	0.166	NO
Redwood St to Commonwealth Ave	2-lane Collector (no center lane)	8,000	3,550	0.444	C	3,900	0.488	C	350	0.044	NO
Commonwealth Avenue											
Boundary St to Juniper St	2-lane Collector (no center lane)	8,000	1,480	0.185	A	2,800	0.350	B	1,320	0.165	NO

Table 6.3-8 Build-out Summary of Roadway Segment Analysis – North Park											
			Existing			Build-out					
Roadway Segment	Roadway Functional Classification	LOS E Capacity	ADT	V/C Ratio[1]	LOS	ADT	V/C Ratio[1]	LOS	Δ in ADT	Δ in V/C	Significant?
El Cajon Boulevard											
Park Blvd to Florida St	6-lane Major Arterial	50,000	19,407	0.388	A	27,100	0.542	B	7,693	0.154	NO
Florida St to Texas St	6-lane Major Arterial	50,000	23,366	0.467	B	34,600	0.692	C	11,234	0.225	NO
Texas St to Oregon St	6-lane Major Arterial	50,000	24,479	0.490	B	37,424	0.748	C	12945	0.258	NO
Oregon St to Utah St	6-lane Major Arterial	50,000	32,468	0.649	C	45,612	0.912	**E**	13,144	0.263	**YES**
Utah St to 30th St	6-lane Major Arterial	50,000	32,191	0.644	C	42,978	0.860	D	10,787	0.216	NO
30th St to Illinois St	6-lane Major Arterial	50,000	39,116	0.782	C	52,696	1.054	**F**	13,580	0.272	**YES**
Illinois St to I-805 Ramps	6-lane Major Arterial	50,000	46,062	0.921	**E**	63,229	1.265	**F**	17,167	0.344	**YES**
Florida Street4											
El Cajon Blvd to University Ave	2-lane Collector (no center lane)	8,000	3,375	0.422	B	7,400	0.925	**E**	4,025	0.503	**YES**
University Ave to Robinson Ave	2-lane Collector (no center lane)	8,000	5,450	0.681	D	8,800	1.100	**F**	3,350	0.419	**YES**
Robinson Ave to Upas St	2-lane Collector (no center lane)	8,000	5,600	0.700	D	6,800	0.850	**E**	1,200	0.150	**YES**
Florida Drive											
Upas St to Morley Field Dr	2-lane Collector (no fronting property)	10,000	5,498	0.550	B	6,700	0.670	C	1,202	0.120	NO
Howard Avenue											
Park Blvd to Florida St	2-lane Collector (continuous left-turn lane)	15,000	3,000	0.200	A				1,800	0.400	NO
	2-lane Collector (no center lane)*	8,000				4,800	0.600	C			
Florida St to Texas St	2-lane Collector (continuous left-turn lane)	15,000	3,566	0.238	A				334	0.250	NO
	2-lane Collector (no center lane)*	8,000				3,900	0.488	C			
Texas St to Utah St	2-lane Collector (continuous left-turn lane)	15,000	4,815	0.321	A				6,485	1.092	**YES**
	2-lane Collector (no center lane)*	8,000				11,300	1.413	**F**			
Utah St to 30th St	2-lane Collector (continuous left-turn lane)	15,000	6,137	0.409	B				4,063	0.866	**YES**
	2-lane Collector (no center lane)*	8,000				10,200	1.275	**F**			
30th St to 32nd St	2-lane Collector (continuous left-turn lane)	15,000	7,187	0.479	C				3,313	0.834	**YES**
	2-lane Collector (no center lane)*	8,000				10,500	1.313	**F**			
Juniper Street											
30th St to 32nd St	2-lane Collector (no center lane)	8,000	3,646	0.456	C	6,200	0.775	D	2,554	0.319	NO
32nd St to Commonwealth Ave	2-lane Collector (no center lane)	8,000	2,826	0.353	B	4,400	0.550	C	1,574	0.197	NO
Landis Street											
Boundary St to Nile St	2-lane Collector (no center lane)	8,000	3,760	0.474	C	4,000	0.500	C	210	0.026	NO

Table 6.3-8 Build-out Summary of Roadway Segment Analysis – North Park											
			Existing			Build-out					
Roadway Segment	Roadway Functional Classification	LOS E Capacity	ADT	V/C Ratio[1]	LOS	ADT	V/C Ratio[1]	LOS	Δ in ADT	Δ in V/C	Significant?
Lincoln Avenue											
Florida St to Texas St	2-lane Collector (no center lane)	8,000	990	0.124	A	4,300	0.538	C	3,310	0.414	NO
Texas St to Utah St	2-lane Collector (no center lane)	8,000	2,400	0.300	A	3,200	0.400	B	800	0.100	NO
Utah St to 30th St	2-lane Collector (continuous left-turn lane)	15,000	4,550	0.303	A	7,500	0.500	C	2,950	0.197	NO
30th St to 32nd St	2-lane Collector (continuous left-turn lane)	15,000	5,563	0.371	B	9,200	0.613	C	3,637	0.242	NO
32nd St to Boundary St	2-lane Collector (continuous left-turn lane)	15,000	5,473	0.365	B	9,800	0.653	C	4,327	0.288	NO
Madison Avenue											
Park Blvd to Mission Ave	2-lane Collector (continuous left-turn lane)	15,000	6,110	0.407	B	8,100	0.540	C	1,990	0.133	NO
Mission Ave to Texas St	2-lane Collector (continuous left-turn lane)	15,000	8,040	0.536	C	10,300	0.687	D	2,260	0.151	NO
Texas St to Ohio St	2-lane Collector (no center lane)	8,000	5,295	0.662	D	12,200	1.525	**F**	6,905	0.863	**YES**
Meade Avenue											
Park Blvd to Texas St	2-lane Collector (continuous left-turn lane)	15,000	4,060	0.271	A				4,140	0.754	**YES**
	2-lane Collector (no center lane)*	8,000				8,200	1.025	**F**			
Texas St to 30th St	2-lane Collector (continuous left-turn lane)	15,000	5,280	0.352	B				4,620	0.886	**YES**
	2-lane Collector (no center lane)*	8,000				9,900	1.238	**F**			
30th St to Illinois St	2-lane Collector (continuous left-turn lane)	15,000	8,576	0.572	C				2,924	0.866	**YES**
	2-lane Collector (no center lane)*	8,000				11,500	1.438	**F**			
Illinois St to Iowa St	2-lane Collector (continuous left-turn lane)	15,000	8,651	0.577	C				3,249	0.911	**YES**
	2-lane Collector (no center lane)*	8,000				11,900	1.488	**F**			
Mission Avenue											
Park Blvd to Mississippi St	2-lane Collector (one-way)	17,500	1,497	0.086	A	3,700	0.211	A	2,203	0.125	NO
Monroe Avenue											
Park Blvd to Mission Ave	2-lane Collector (no center lane)	8,000	1,200	0.150	A	3,200	0.400	B	2,000	0.250	NO
Mission Ave to Texas St	2-lane Collector (no center lane)	8,000	1,500	0.188	A	5,500	0.688	D	4,000	0.500	NO
Texas St to 30th St	2-lane Collector (no center lane)	8,000	2,158	0.270	A	5,700	0.713	D	3,542	0.443	NO
Nile Street											
Landis St to Thorn St	2-lane Collector (no center lane)	8,000	4,305	0.538	C	5,000	0.625	D	695	0.087	NO
North Park Way											
30th St to 32nd St	2-lane Collector (no fronting property)	10,000	6,737	0.674	C	8,500	0.850	D	1,763	0.176	NO
32nd St to Boundary St	2-lane Collector (no fronting property)	10,000	--	--	--	10,600	1.060	**F**	--	--	--
Orange Avenue/Howard Avenue											
Iowa St to I-805	2-lane Collector (continuous left-turn lane)	15,000	5,938	0.396	B				2,262	0.151	NO
	2-lane Collector (no center lane)*	8,000				8,200	0.547	C			
Pentuckett Avenue											
Juniper St to Fir St	2-lane Collector (no center lane)	8,000	2,225	0.278	A	2,300	0.288	A	75	0.010	NO
Pershing Drive											
Upas St to Redwood St	2-lane Collector (continuous left-turn lane)	15,000	6,439	0.429	B	10,500	0.700	D	4,061	0.271	NO

Table 6.3-8 Build-out Summary of Roadway Segment Analysis – North Park											
			Existing			Build-out					
Roadway Segment	Roadway Functional Classification	LOS E Capacity	ADT	V/C Ratio[1]	LOS	ADT	V/C Ratio[1]	LOS	Δ in ADT	Δ in V/C	Significant?
Redwood Street											
28th St to 30th St	2-lane Collector (no center lane)	8,000	5,988	0.749	D	7,200	0.900	E	1,212	0.151	**YES**
30th St to 32nd St	2-lane Collector (no center lane)	8,000	4,912	0.614	C	4,912	0.614	C	0	0.000	NO
32nd St to Boundary St	2-lane Collector (no center lane)	8,000	1,650	0.206	A	4,400	0.550	C	2,750	0.344	NO
Robinson Avenue0											
Park Blvd to Florida St	2-lane Collector (no center lane)	8,000	4,160	0.520	C	5,900	0.738	D	1,740	0.218	NO
Texas Street											
Adams Ave to Mission Ave	3-lane Major Arterial	30,000	27,532	0.918	E	39,100	1.303	**F**	11,568	0.385	**YES**
Mission Ave to El Cajon Blvd	2-lane Collector (continuous left-turn lane)	15,000	16,563	1.104	F				21,737	0.173	**YES**
	4-lane Collector	30,000				38,300	1.277	**F**			
El Cajon Blvd to Howard Ave	2-lane Collector (continuous left-turn lane)	15,000	10,404	0.694	D	14,038	0.936	**E**	3,634	0.242	**YES**
Howard Ave to University Ave	2-lane Collector (continuous left-turn lane)	15,000	9,461	0.631	C	15,738	1.049	**F**	6,277	0.418	**YES**
University Ave to Myrtle Ave	2-lane Collector (no center lane)	8,000	3,821	0.478	C	5,700	0.713	D	1,879	0.235	NO
Myrtle Ave to Upas St	2-lane Collector (no center lane)	8,000	2,814	0.352	B	4,100	0.513	C	1,286	0.161	NO
University Avenue											
Park Blvd to Florida St	4-lane Collector (no center lane)	15,000	19,200	1.280	F	23,900	1.593	**F**	4,700	0.313	**YES**
Florida St to Texas St	4-lane Collector (no center lane)	15,000	21,611	1.441	F	21,611	1.441	**F**	0	0.000	NO
Texas St to Oregon St	4-lane Collector (no center lane)	15,000	20,058	1.337	F	25,373	1.692	**F**	5,315	0.355	**YES**
Oregon St to Utah St	4-lane Collector (no center lane)	15,000	20,361	1.357	F	24,699	1.647	**F**	4,338	0.290	**YES**
Utah St to 30th St	4-lane Collector (no center lane)	15,000	19,173	1.278	F	22,799	1.519	**F**	3,606	0.241	**YES**
30th St to Illinois St	4-lane Collector (no center lane)	15,000	21,100	1.835	F	25,391	2.208	**F**	4,291	0.373	**YES**
Illinois St to 32nd St	3-lane Collector (no center lane)	11,500	19,644	1.708	F	25,329	2.203	**F**	5,685	0.495	**YES**
32nd St to Boundary St	3-lane Collector (no center lane)	11,500	25,568	1.705	F	32,449	2.163	**F**	6,881	0.458	**YES**
Upas Street											
Alabama St to Texas St	2-lane Collector (no center lane)	8,000	7,100	0.888	**E**	8,600	1.075	**F**	1,500	0.187	**YES**
Texas St to Pershing Dr	2-lane Collector (no center lane)	8,000	7,160	0.895	**E**	11,500	1.438	**F**	4,340	0.543	**YES**
Pershing Dr to 30th St	2-lane collector (continuous left-turn lane)	15,000	9,574	0.638	C	16,300	1.087	**F**	6,726	0.449	**YES**
30th St to 32nd St	2-lane Collector (no center lane)	8,000	4,347	0.543	C	6,100	0.763	D	1,753	0.220	NO
32nd St to Boundary St	2-lane Collector (no center lane)	8,000	2,600	0.325	B	2,700	0.338	B	100	0.013	NO

Table 6.3-8 Build-out Summary of Roadway Segment Analysis – North Park											
			Existing			Build-out					
Roadway Segment	Roadway Functional Classification	LOS E Capacity	ADT	V/C Ratio[1]	LOS	ADT	V/C Ratio[1]	LOS	Δ in ADT	Δ in V/C	Significant?
Utah Street											
Adams Ave to Monroe Ave	2-lane Collector (no center lane)	8,000	992	0.124	A	5,000	0.625	D	4,008	0.501	NO
Monroe Ave to El Cajon Blvd	2-lane Collector (no center lane)	8,000	2,841	0.355	B	5,300	0.663	D	2,459	0.308	NO
El Cajon Blvd to Howard Ave	2-lane Collector (no center lane)	8,000	4,362	0.545	C	6,400	0.800	D	2,038	0.255	NO
Howard Ave to Lincoln Ave	2-lane Collector (no center lane)	8,000	2,535	0.317	B	7,300	0.913	**E**	4,765	0.596	**YES**
Lincoln Ave to University Ave	3-lane Collector (no center lane)	11,500	2,900	0.252	A	4,700	0.409	B	1,800	0.157	NO
University Ave to North Park Way	2-lane Collector (no center lane)	8,000	4,740	0.593	C	5,100	0.638	D	360	0.045	NO
North Park Way to Upas St	2-lane Collector (no center lane)	8,000	1,919	0.240	A	7,500	0.938	**E**	5,581	0.698	**YES**

Notes:
Bold values indicate roadway segments operating at LOS E or F.
*Howard Avenue, Meade Avenue, Orange Avenue/Howard Avenue will be classified as a two-lane collector with no continuous center left turn lane to accommodate future bicycle boulevard pending further project-level analysis.
Capacity for non-standard roadway classifications were provided by City of San Diego staff.
[1] The v/c ratio is calculated by dividing the ADT volume by each respective roadway segment's capacity.

d. Freeway Segments

Table 6.3-9 displays the LOS analysis results for the freeway segments using their existing freeway configuration and the future peak-hour traffic volumes. As shown, the traffic generated by the land use changes associated with the Uptown, North Park and Golden Hill would have a cumulative traffic related impact along all 18 freeway segments within the study area.

The following significant cumulative freeway segment impacts are identified:

Impact 6.3-27: The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to five segments of I-5 from Old Town Avenue to Imperial Avenue.

Impact 6.3-28: The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive segments of I-8 from Hotel Circle West to SR-15.

Impact 6.3-29: The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to the segment of SR-15 from I-805 to SR-94.

Impact 6.3-30: The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three segments of I-805 from I-8 to SR-15.

Impact 6.3-31: The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three segments of SR-94 from 25th Street to SR-15.

Impact 6.3-32: The proposed North Park CPU and associated discretionary actions would have a cumulative traffic impact to three segments of SR-163 from I-8 to I-5.

Table 6.3-9 Summary of Freeway Segment Level of Service									
				Existing		Buildout			
Freeway Segment	Direction	Number of Lanes	Capacity[1]	V/C Ratio[2]	LOS	V/C Ratio	LOS	Δ[3]	Significant?
AM Peak									
I-5									
Old Town Ave to Washington St	NB	4 M + 1 A	9,200	0.950	**E**	1.183	**F_0**	0.234	**YES**
	SB	4 M + 1 A	9,200	0.746	C	0.798	C	0.052	NO
Washington St to Pacific Highway	NB	4 M	8,000	0.840	**D**	1.096	**F_0**	0.256	**YES**
	SB	4 M	8,000	0.660	C	0.739	C	0.079	NO
First Ave to Sixth Ave	NB	4 M + 1 A	9,200	1.264	**F_1**	1.341	**F_1**	0.078	**YES**
	SB	5 M + 1 A	11,200	0.346	A	0.743	C	0.397	NO
SR-163 to SR-94	NB	5 M + 1 A	11,200	1.085	**F_0**	1.149	**F_0**	0.064	**YES**
	SB	5 M + 1 A	11,200	0.362	A	0.901	**D**	0.540	NO
SR-94 to Imperial Ave	NB	4 M + 1 A	9,200	1.035	**F_0**	1.064	**F_0**	0.029	**YES**
	SB	4 M + 1 A	9,200	0.345	A	0.835	**D**	0.490	NO
I-8									
Hotel Circle (W) to Hotel Circle (E)	WB	4 M + 1 A	9,200	1.022	**F_0**	1.333	**F_1**	0.311	**YES**
	EB	4 M	8,000	0.887	**D**	0.763	C	-0.124	NO
Mission Center Rd to Qualcomm Wy	WB	4 M + 1 A	9,200	1.109	**F_0**	1.366	**F_2**	0.257	**YES**
	EB	4 M + 1 A	9,200	0.837	**D**	0.680	C	-0.157	NO
I-805 to SR-15	WB	4 M + 1 A	9,200	1.349	**F_1**	1.545	**F_2**	0.196	**YES**
	EB	4 M + 1 A	9,200	0.727	C	0.766	C	0.040	NO
SR-15									
I-805 to SR-94	NB	3 M + 1 A	7,200	0.532	B	0.772	C	0.241	NO
	SB	2 M + 1 A	5,200	0.976	**E**	1.283	**F_1**	0.307	**YES**
I-805									
I-8 to Adams Ave	NB	4 M + 1 A	9,200	1.262	**F_1**	1.515	**F_2**	0.253	**YES**
	SB	5 M + 1 A	11,200	0.383	A	0.458	B	0.074	NO
El Cajon Blvd to University Ave	NB	4 M	8,000	0.602	B	1.427	**F_2**	0.825	**YES**
	SB	4 M + 1 A	9,200	1.063	**F_0**	0.457	B	-0.607	NO
University Ave to SR-15	NB	4 M + 1 A	9,200	0.466	B	1.207	**F_0**	0.740	**YES**
	SB	4 M + 1 A	9,200	0.947	**E**	0.421	B	-0.526	NO

Table 6.3-9 Summary of Freeway Segment Level of Service									
				Existing		Buildout			
Freeway Segment	Direction	Number of Lanes	Capacity[1]	V/C Ratio[2]	LOS	V/C Ratio	LOS	Δ[3]	Significant?
SR-94									
25th St to 28th St	WB	4 M	8,000	0.976	**E**	1.241	**F_0**	0.264	**YES**
	EB	4 M	8,000	0.361	A	0.470	B	0.109	NO
28th St to 30th St	WB	4 M	8,000	1.095	**F_0**	1.303	**F_1**	0.208	**YES**
	EB	4 M	8,000	0.405	A	0.494	B	0.089	NO
Broadway to SR-15	WB	4 M	8,000	1.214	**F_0**	1.414	**F_2**	0.200	**YES**
	EB	4 M + 1 A	9,200	0.390	A	0.466	B	0.075	NO
SR-163									
I-8 to Washington St	NB	3 M + 1 A	7,200	0.575	B	1.121	**F_0**	0.546	**YES**
	SB	3 M + 1 A	7,200	0.828	**D**	0.950	**E**	0.122	**YES**
Washington St to Robinson Ave	NB	2 M	4,000	0.800	C	0.830	**D**	0.031	NO
	SB	2 M	4,000	1.151	**F_0**	1.846	**F_2**	0.696	**YES**
Quince Dr to I-5	NB	2 M	4,000	0.884	**D**	0.914	**D**	0.030	NO
	SB	2 M	4,000	1.641	**F_2**	2.032	**F_3**	0.391	**YES**
PM PEAK									
I-5									
Old Town Ave to Washington St	NB	4 M + 1 A	9,200	0.780	C	1.000	**E**	0.220	**YES**
	SB	4 M + 1 A	9,200	0.916	**D**	1.187	**F_0**	0.271	**YES**
Washington St to Pacific Highway	NB	4 M	8,000	0.690	C	0.926	**E**	0.236	**YES**
	SB	4 M	8,000	0.810	**D**	1.100	**F_0**	0.290	**YES**
First Ave to Sixth Ave	NB	4 M + 1 A	9,200	1.078	**F_0**	1.133	**F_0**	0.055	**YES**
	SB	5 M + 1 A	11,200	0.498	B	1.105	**F_0**	0.607	**YES**
SR-163 to SR-94	NB	5 M + 1 A	11,200	0.926	**E**	1.091	**F_0**	0.166	**YES**
	SB	5 M + 1 A	11,200	0.521	B	1.213	**F_0**	0.693	**YES**
SR-94 to Imperial Ave	NB	4 M + 1 A	9,200	0.883	**D**	1.011	**F_0**	0.127	**YES**
	SB	4 M + 1 A	9,200	0.497	B	1.124	**F_0**	0.627	**YES**
I-8									
Hotel Circle (W) to Hotel Circle (E)	WB	4 M + 1 A	9,200	0.807	**D**	0.889	**D**	0.082	NO
	EB	4 M	8,000	1.134	**F_0**	1.449	**F_2**	0.315	**YES**
Mission Center Rd to Qualcomm Wy	WB	4 M + 1 A	9,200	0.876	**D**	0.910	**D**	0.035	NO
	EB	4 M + 1 A	9,200	1.070	**F_0**	1.291	**F_1**	0.221	**YES**
I-805 to SR-15	WB	4 M + 1 A	9,200	0.893	**D**	0.920	**E**	0.027	**YES**
	EB	4 M + 1 A	9,200	1.183	**F_0**	1.511	**F_2**	0.327	**YES**

Table 6.3-9 Summary of Freeway Segment Level of Service									
				Existing		Buildout			
Freeway Segment	Direction	Number of Lanes	Capacity[1]	V/C Ratio[2]	LOS	V/C Ratio	LOS	Δ[3]	Significant?
SR-15									
I-805 to SR-94	NB	3 M + 1 A	7,200	0.532	B	1.120	**F_0**	0.589	**YES**
	SB	2 M + 1 A	5,200	0.976	**E**	1.367	**F_2**	0.391	**YES**
I-805									
I-8 to Adams Ave	NB	4 M + 1 A	9,200	0.588	B	1.063	**F_0**	0.475	**YES**
	SB	5 M + 1 A	11,200	0.937	**E**	1.297	**F_1**	0.360	**YES**
El Cajon Blvd to University Ave	NB	4 M	8,000	1.095	**F_0**	1.001	**F_0**	-0.094	NO
	SB	4 M + 1 A	9,200	0.635	C	1.293	**F_1**	0.659	**YES**
University Ave to SR-15	NB	4 M + 1 A	9,200	0.848	**D**	0.867	**D**	0.019	NO
	SB	4 M + 1 A	9,200	0.565	B	1.203	**F_0**	0.637	**YES**
SR-94									
25th St to 28th St	WB	4 M	8,000	0.401	A	0.612	B	0.210	NO
	EB	4 M	8,000	0.936	**E**	1.482	**F_2**	0.545	**YES**
28th St to 30th St	WB	4 M	8,000	0.450	B	0.642	C	0.192	NO
	EB	4 M	8,000	1.050	**F_0**	1.556	**F_2**	0.506	**YES**
Broadway to SR-15	WB	4 M	8,000	0.499	B	0.697	C	0.198	NO
	EB	4 M + 1 A	9,200	1.012	**F_0**	1.468	**F_2**	0.456	**YES**
SR-163									
I-8 to Washington St	NB	3 M + 1 A	7,200	0.870	**D**	1.301	**F1**	0.431	**YES**
	SB	3 M + 1 A	7,200	0.533	B	0.797	C	0.264	NO
Washington St to Robinson Ave	NB	2 M	4,000	1.209	**F0**	1.658	**F2**	0.449	**YES**
	SB	2 M	4,000	0.741	C	1.016	**F0**	0.275	**YES**
Quince Dr to I-5	NB	2 M	4,000	1.364	**F2**	1.362	**F2**	-0.001	NO
	SB	2 M	4,000	1.162	**F0**	1.160	**F0**	-0.001	NO

Notes:
Bold values indicate freeway segments operating at LOS E or F.
For descriptions of LOS ratings for freeway segments, refer to Table 6.3-3.
V/C Ratio is the volume to capacity ratio
Δ = change in v/c ratio between existing and buildout
[1]The capacity is calculated as 2,000 ADT per lane and 1,200 ADT per auxiliary lane
[2] Traffic volumes provided by City of San Diego model
[3]Peak-hour volume calculated by: (ADT*K*D)/Truck Factor

e. Ramp Meters

Table 6.3-10 displays the analysis results for the ramp meters using their existing configuration and meter rate and the future peak-hour traffic volumes. As shown, the traffic generated by the land use changes associated with the Uptown, North Park and Golden Hill CPUs would have a cumulative traffic related impact at three ramp meters within the study area as follows:

Impact 6.3-33 Hancock Street to I-5 southbound on-ramp in the PM peak period.

Impact 6.3-34 Kettner Boulevard to I-5 southbound on-ramp in the PM peak period.

Impact 6.3-35 Fifth Ave to I-5 southbound on-ramp in the PM peak period.

Issue 2 Alternative Transportation

Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?

a. Transit

Planned transit services within the North Park community, identified in the 2050 ~~RTP~~RP and discussed in the Uptown, North Park, and Golden Hill Community Plan Update Mobility Study for Build-out Conditions (Appendix C, Kimley-Horn and Associates, 2015), include light rail transit (LRT), streetcar, ~~BRT~~Rapid transit as shown on Figure 6.3-3. Definitions of each of these types of service are provided in Chapter 2.0 of this PEIR. Planned transit services within the North Park CPU area are described below:

- Route 2, along 30th Street, would convert to a ~~BRT~~Rapid transit route. Route 2 currently provides high-frequency local bus service from Downtown San Diego to North Park traveling along 30th Street. The expected year for completion of this improvement is 2030.
- Route 10, along University Avenue would be transitioned to a Rapid service. Route 10 currently provides high-frequency local bus service from Old Town to College Avenue. The expected year of completion of this improvement is 2020.
- Mid-City LRT is planned as a service extension from the City College Trolley station. Construction of Mid-City LRT would be done in two phases. Phase 1 would include a LRT extension from downtown to Mid-City via El Cajon Boulevard and Park Boulevard. Phase 2 would extend the Phase 1 construction efforts to the current SDSU transit center. LRT service would be provided via El Cajon Boulevard in the North Park community corridor. The expected year for completion of phase 1 of this improvement is 2035.
- A new bus route, currently designated as route 637, would provide Rapid service from North Park to the 32nd Street Trolley station in Barrio Logan. The expected year for completion of this improvement is 2035.
- A new streetcar service, currently designated as route 555, would provide streetcar service from 30th Street to Downtown San Diego. The planned route defined in the ~~RTP~~RP is along 30th Street, with connection to downtown via Golden Hill. The expected year for completion of this improvement is 2035.

Table 6.3-10 Peak Hour Ramp Metering Analysis – Horizon Year Conditions											
On-Ramp	Peak Period	Meter Rate[1] (veh/hr)	Existing Demand[2] (veh/hr)	Excess Existing Demand (veh/hr)	Average Existing Delay (min)	Build-out Demand[2] (veh/hr)	Excess Build-out Demand (veh/hr)	Average Build-out Delay (min)	D In Delay With Project (min)	Significant ?	Average With Project Queue
Interstate 5											
Washington St to I-5 NB	AM	996	1020	24	1.4	1241	245	14.8	13.3	NO	6,125 ft
	PM	996	1034	38	2.3	1227	231	13.9	11.6	NO	5,775 ft
India St to I-5 NB	AM	996	915	0	0.0	1007	11	0.6	0.6	NO	263 ft
	PM	996	1066	70	4.2	1173	177	10.6	6.4	NO	4,415 ft
Hawthorn St to I-5 NB	AM	996	454	0	0.0	460	0	0.0	0.0	NO	0 ft
	PM	996	842	0	0.0	825	0	0.0	0.0	NO	0 ft
Hancock St to I-5 SB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	1140	1287	147	7.7	1542	402	21.2	**13.4**	**YES**	10,050 ft
Kettner Blvd to I-5 SB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	498	269	0	0.0	861	363	43.7	**43.7**	**YES**	9,070 ft
Fifth Ave to I-5 SB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	996	1087	91	5.5	1894	898	54.1	**48.6**	**YES**	22,462 ft
Interstate 8											
NB Texas St to I-8 EB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	498	465	0	0.0	579	81	9.8	9.8	NO	2,026 ft
SB Texas St to I-8 EB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	1140	866	0	0.0	888	0	0.0	0.0	NO	0 ft
Interstate 805											
El Cajon Blvd to I-805 NB	AM	1140	860	0	0.0	1118	0	0.0	0.0	NO	0 ft
	PM	Ramp not metered in the PM peak							0.0	NO	0 ft
University Ave to I-805 NB	AM	1140	998	0	0.0	1132	0	0.0	0.0	NO	0 ft
	PM	Ramp not metered in the PM peak							0.0	NO	0 ft

Table 6.3-10 Peak Hour Ramp Metering Analysis – Horizon Year Conditions											
On-Ramp	Peak Period	Meter Rate[1] (veh/hr)	Existing Demand[2] (veh/hr)	Excess Existing Demand (veh/hr)	Average Existing Delay (min)	Build-out Demand[2] (veh/hr)	Excess Build-out Demand (veh/hr)	Average Build-out Delay (min)	D In Delay With Project (min)	Significant ?	Average With Project Queue
Interstate 94											
28th St to SR-94 WB	AM	534	100	0	0.0	205	0	0.0	0.0	NO	0 ft
	PM	Ramp not metered in the PM peak							0.0	NO	0 ft
32nd St/Broadway to SR-94 WB	AM	570	99	0	0.0	173	0	0.0	0.0	NO	0 ft
	PM	Ramp not metered in the PM peak							0.0	NO	0 ft
25th St to SR-94 EB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	960	785	0	0.0	935	0	0.0	0.0	NO	0 ft
28th St to SR-94 EB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	960	732	0	0.0	870	0	0.0	0.0	NO	0 ft
32nd St/Broadway to SR-94 EB	AM	Ramp not metered in the AM peak							0.0	NO	0 ft
	PM	570	464	0	0.0	558	0	0.0	0.0	NO	0 ft
Interstate 163											
Washington St to SR-163 SB	AM	498	373	0	0.0	615	117	14.2	14.2	NO	2,936 ft
	PM	Ramp not metered in the PM peak							0.0	NO	0 ft

NOTES:
[1] Meter rate is the assumed peak hour capacity expected to be processed through the ramp meter (using Caltrans fast rate)
[2] Demand is the peak hour demand using the on-ramp
EB= eastbound, SB = southbound, NB = northbound, WB = westbound

The proposed North Park CPU and associated discretionary actions would support implementation of the transit improvements identified in the 2050 ~~RTP~~RP by providing policies that support prioritizing the transit system and improving efficiency of transit services. For example, a number of transit focused Mobility Element Policies are included in the proposed North Park CPU that would support efforts to develop planned transit facilities including working with the Metropolitan Transit System (MTS) and SANDAG to implement transit improvements and provide incentives to promote the use of transit. Thus, implementation of the project would not interfere with implementation of planned transit improvements and would provide policy support to support their implementation. Thus, impacts related to conflicts with existing or planned transit facilities would be less than significant.

b. Bicycle Facilities

The proposed North Park CPU and associated discretionary actions would support existing plans and policies relative to the bicycle network. The recommended bicycle facility network for the proposed CPU is shown on Figure 6.3-5. The Mobility Element includes several bicycle-focused policies that support and prioritize bicycling as a mode of travel in the community and encourage connections between neighboring communities. Policies in the proposed plan support coordination with SANDAG on the planning and implementation of regional bicycle facilities, support increased bicycle comfort and safety, repurposing rights-of-way for bicycle facilities, and bike sharing. Thus, implementation of the proposed North Park CPU and associated discretionary actions would not project conflict with adopted policies, plans, or programs supporting bicycle facilities.

c. Pedestrian Facilities

There are no major planned and funded pedestrian facility improvement projects for the North Park community. However, the proposed North Park CPU Mobility Element includes a number of policies that support enhancements to pedestrian travel routes within the CPU area. Implementation of the proposed North Park CPU and associated discretionary actions would not restrict or impede pedestrian connectivity and would not conflict with any adopted policies or plans addressing pedestrian facilities. Thus, impacts would be less than significant.

6.3.4 Significance of Impacts

The following cumulative impacts to intersections, roadway segments, freeway segments and ramp meters were determined to be significant:

Issue 1 Traffic Circulation

a. Intersections

- Madison Avenue & Texas Street (Impact 6.3-1)
- El Cajon Boulevard & 30th Street (Impact 6.3-2)
- El Cajon Boulevard & I-805 SB Ramps (Impact 6.3-3)
- University Avenue & 30th Street (Impact 6.3-4)

- University Avenue & Boundary Street (Impact 6.3-5)
- University Avenue & I-805 NB Ramps (Impact 6.3-6)
- North Park Way/ I-805 SB Ramps & Boundary Street/33rd Street (Impact 6.3-7)
- Upas Street & 30th Street (Impact 6.3-8)

b. Roadway Segments

- 30th Street: Meade Avenue to University Avenue (Impact 6.3-9)
- 30th Street: North Park Way to Juniper Street (Impact 6.3-10)
- 32nd Street: University Avenue to Upas Street (Impact 6.3-11)
- Adams Avenue: Texas Street to 30th Street (Impact 6.3-12)
- Boundary Street: University Avenue to North Park Way (Impact 6.3-13)
- El Cajon Boulevard: Oregon Street to Utah Street (Impact 6.3-14)
- El Cajon Boulevard: 30th Street to I-805 Ramps (Impact 6.3-15)
- Florida Street: El Cajon Boulevard to Upas Street (Impact 6.3-16)
- Howard Avenue: Texas Street to 32nd Street (Impact 6.3-17)
- Madison Avenue: Texas Street to Ohio Street (Impact 6.3-18)
- Meade Avenue: Park Boulevard to Iowa Street (Impact 6.3-19)
- Redwood Street: 28th Street to 30th Street (Impact 6.3-20)
- Texas Street: Adams Avenue to University Avenue (Impact 6.3-21)
- University Avenue: Park Boulevard to Florida Street (Impact 6.3-22)
- University Avenue: Texas Street to Boundary Street (Impact 6.3-23)
- Upas Street: Alabama Street to 30th Street (Impact 6.3-24)
- Utah Street: Howard Avenue to Lincoln Avenue (Impact 6.3-25)
- Utah Street: North Park Way to Upas Street (Impact 6.3-26)

c. Freeway Segments

- I-5 from Old Town Avenue to Imperial Avenue (Impact 6.3-27)
- I-8 from Hotel Circle West to SR-15 (Impact 6.3-28)
- SR-15 from I-805 to SR-94 (Impact 6.3-29)
- I-805 from I-8 to SR-15 (Impact 6.3-30)
- SR-94 from 25th Street to SR-15 (Impact 6.3-31)
- SR-163 from I-8 to I-5 (Impact 6.3-32)

d. Ramp Meters

- Hancock Street to I-5 southbound on-ramp in the PM peak period (6.3-33)
- Kettner Boulevard to I-5 southbound on-ramp in the PM peak period (6.3-34)
- Fifth Ave to I-5 southbound on-ramp in the PM peak period (6.3-35)

Issue 2 Alternative Transportation

The proposed North Park CPU and associated discretionary actions would be consistent with adopted policies, plans, or programs supporting alternative transportation. Additionally, the proposed CPU and associated discretionary actions would provide policies that support

improvements to pedestrian, bicycle, and transit facilities. Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans or programs supporting alternative transportation, and no mitigation is required.

6.3.5 Mitigation Framework

The TIS identified improvements that would mitigate or reduce roadway segment and intersection impacts. The improvements that are ultimately recommended as part of the North Park CPU are included in the Impact Fee Study (IFS). However, in most cases, the improvements that would mitigate or reduce vehicular impacts were not recommended as part of the North Park CPU in order to maintain consistency with the overall mobility vision and other policies of the North Park CPU. Of the measures listed below, only three are included in the proposed IFS: measures TRANS 6.3-5, TRANS 6.3-7, TRANS 6.3-13 and Trans 6.3-18.

6.3.5.1 Intersections

While the following intersection mitigation measures would reduce potentially significant impacts, none of the following measures addressing intersection impacts are proposed as part of the North Park CPU and associated discretionary actions and only measure TRANS 6.3-5 and 6.3-7 ~~is~~ are included within the proposed IFS.

TRANS 6.3-1 Madison Avenue & Texas Street (Impact 6.3-1): Widen Texas Street in the northbound direction to add a second through lane. Widen Madison Avenue in the westbound direction to add a second right-turn lane. This cannot be accomplished with restriping of the roadway.

TRANS 6.3-2 El Cajon Boulevard & 30th Street (Impact 6.3-2): Restripe 30th Street in the southbound direction to add a second left-turn lane and remove parking. Restripe El Cajon Boulevard in the westbound direction to add a second WB left-turn lane and remove parking.

TRANS 6.3-3 El Cajon Boulevard & I-805 SB Ramps (Impact 6.3-3): Widen the I-805 SB off-ramp to add a second right-turn lane.

TRANS 6.3-4 University Avenue & 30th Street (Impact 6.3-4): Restripe 30th street in the southbound direction to add a second through lane and remove parking.

TRANS 6.3-5 University Avenue & Boundary Street (Impact 6.3-5): Modify signal and restripe southbound approach to provide exclusive right-turn, through, and left-turn lanes on Boundary Street. This improvement project is identified in the North Park IFS.

TRANS 6.3-6 University Avenue & I-805 NB Ramps (Impact 6.3-6): Widen University Avenue in the eastbound direction to add an exclusive right-turn lane. Widen University Avenue in the westbound direction to add a shared through right-turn lane. Restripe and reconstruct medians on the I-805 northbound ramps to have dual left-turn lanes and an exclusive through lane and right-turn lane.

TRANS 6.3-7 North Park Way/ I-805 SB Ramps & Boundary Street/33rd Street (Impact 6.3-7): Signalize intersection and add a second left-turn lane in the southbound direction on Boundary Street and widen the I-805 southbound on-ramp to add an additional receiving lane. An additional lane may be required by Caltrans on the SB I-805 off-ramp. This improvement project is identified in the North Park IFS.

TRANS 6.3-8 Upas Street & 30th Street (Impact 6.3-8): Restripe Upas Street in the westbound direction to add an exclusive right-turn lane.

6.3.5.2 Roadway Segments

While the following roadway segment mitigation measures would reduce potentially significant impacts, only measures TRANS 6.3-13 and TRANS 6.3-18 would be consistent with ~~are proposed as part of~~ the North Park CPU and associated discretionary actions and are included within the proposed IFS. The remaining measures would be inconsistent with the proposed North Park CPU.

TRANS 6.3-9 30th Street from Meade Avenue to University Avenue (Impact 6.3-9): Widen the roadway to a 4 lane collector.

TRANS 6.3-10 30th Street from North Park Way to Juniper Street (Impact 6.3-10)

a. North Park Way to Upas Street: Widen the roadway to a 4 lane collector.
b. Upas Street to Juniper Street: Restripe the roadway to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-11 32nd Street from University Avenue to Upas Street (Impact 6.3-11): Restripe the roadway to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-12 Adams Avenue from Texas Street to 30th Street (Impact 6.3-12): Widen the roadway to a 4 lane collector.

TRANS 6.3-13 Boundary Street from University Avenue to North Park Way (Impact 6.3-13): Widen the roadway to a 4 lane collector with a continuous left-turn lane. This improvement project is identified in the North Park IFS.

TRANS 6.3-14 El Cajon Boulevard from Oregon Street to Utah Street (Impact 6.3-14): Widen the roadway to an 8 lane major arterial.

TRANS 6.3-15 El Cajon Boulevard from 30th Street to I-805 Ramps (Impact 6.3-15): Widen the roadway to an 8 lane major arterial.

TRANS 6.3-16 Florida Street from El Cajon Boulevard to Upas Street (Impact 6.3-16): Restripe the roadway to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-17 Howard Avenue from Texas Street to 32nd Street (Impact 6.3-17): Remove the bicycle boulevard and restore the roadway configuration to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-18 Madison Avenue from Texas Street to Ohio Street (Impact 6.3-18): Restripe the roadway to a 2 lane collector with continuous left-turn lane. This improvement project is identified in the North Park IFS.

TRANS 6.3-19 Meade Avenue from Park Boulevard to Iowa Street (Impact 6.3-19): Remove the bicycle boulevard and restore the roadway configuration to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-20 Redwood Street from 28th Street to 30th Street (Impact 6.3-20): Restripe the roadway to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-21 Texas Street (Impact 6.3-21):

a. Adams Avenue to El Cajon Boulevard: Widen the roadway to a 6 lane major arterial. From Adams Avenue to Mission Avenue, construction of a retaining wall would be required along the east side of Texas Street to attenuate noise. Additionally, widening the Adams Avenue Bridge under path would be required.

b. El Cajon Boulevard to University Avenue: Widen the roadway to a 4 lane collector.

TRANS 6.3-22 University Avenue from Park Boulevard to Florida Street (Impact 6.3-22): Widen the roadway to a 4 lane collector.

TRANS 6.3-23 University Avenue (Impact 6.3-23):

a. Texas Street to 32nd Street: Widen the roadway to a 4 lane collector.
b. 32nd Street to Boundary Street: Widen the roadway to a 4 lane major arterial and add a raised median.

TRANS 6.3-24 Upas Street (Impact 6.3-24)

a. Alabama Street to Pershing Road: Restripe the roadway to a 2 lane collector with continuous left-turn lane.
b. Pershing Road to 30th Street: Widen the roadway to a 4 lane collector.

TRANS 6.3-25 Utah Street from Howard Avenue to Lincoln Avenue (Impact 6.3-25): Restripe the roadway to a 2 lane collector with continuous left-turn lane.

TRANS 6.3-26 Utah Street from North Park Way to Upas Street (Impact 6.3-26): Restripe the roadway to a 2 lane collector with continuous left-turn lane.

6.3.5.3 Freeway Segments

~~No mitigation measures are identified for impacts to freeways because freeway improvements are not within the authority of the City.~~ The improvements identified in SANDAG's ~~RTP~~RP would improve operations along the freeway segments and ramps; however, to what extent is still undetermined, as these are future improvements that must be defined more over time. Furthermore,

implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. However, the City will continue to coordinate with Caltrans and SANDAG, as future project-level developments proceed, to develop potential "fair share" multi-modal mitigation strategies for freeway impacts, as appropriate. The following are the freeway mainline improvements identified in SANDAG's ~~RTP~~RP:

TRANS 6.3-27: I-5 northbound and southbound from Old Town Avenue to Imperial Avenue: ~~SANDAG's 2050 Revenue Constrained RTP includes operational improvements along I-5 between Old Town Avenue and Imperial Avenue. This project is expected to be constructed by year 2050. This measure provides partial mitigation, since it improves freeway operation in the vicinity of the project.~~ No improvements are identified for this segment in SANDAG's 2050 RP.

TRANS 6.3-28 I-8 eastbound and westbound from Hotel Circle (W) to SR-15: SANDAG's 2050 ~~Revenue Constrained RTP~~RP includes operational improvements along I-8 between I-15 and SR-125 (expected to be constructed by 2040) and between I-5 and I-15 (expected to be constructed by 2050) ~~Hotel Circle (W) and SR-15~~. This project is expected to be constructed by year 2050. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project.

TRANS 6.3-29 SR-15 northbound and southbound from I-805 to SR-94: SANDAG's 2050 ~~Revenue Constrained RTP~~RP proposes the construction of managed lanes along SR-15 from I-5 to I-805 and from I-8 to SR-163~~between I-805 and SR-94. This project is expected to be constructed by year 2035~~. This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane.

TRANS 6.3-30 I-805 northbound and southbound from I-8 to SR-15: SANDAG's 2050 ~~Revenue Constrained RTP~~RP proposes the construction of managed lanes along I-805 between ~~I-8 and~~ SR-15 and SR-52. This project is expected to be constructed by year 20~~3~~50. This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane.

TRANS 6.3-31 SR-94 eastbound and westbound from 25th Street to SR-15: SANDAG's 2050 ~~Revenue Constrained RTP~~RP proposes the construction of managed lanes along SR-94 between I-5 to SR-125~~25th Street and SR-15~~. ~~This project is expected to be constructed by year 2020~~Caltrans is evaluating alternatives to this measure as part of the environmental analysis for the SR-94 Express Lanes Project, including bus on shoulders and other multi-modal projects outlined in the Community Based Alternatives of the SR-94 Express Lanes Project. This measure (or an alternative measure) would provide~~s~~ partial mitigation, since it would reduce~~s~~ the traffic demand on the freeway general purpose lanes.

TRANS 6.3-32 SR-163 northbound from I-8 to Robinson Avenue and SR-163 southbound from I-8 to I-5: No improvements are identified for this state route segment in SANDAG's 2050 ~~RTP~~RP.

At the project-level, significant impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of transportation demand management (TDM) measures that encourage carpooling and other alternative means of transportation consistent with proposed CPU policies. Fair share contributions could also be provided toward the construction of the following projects that are included in the SANDAG RP:

- Operational improvements along I-8 between I-5 to SR-15 (TRANS 6.3-28)
- Construction of managed lanes along SR-15 between I-805 and SR-94 (TRANS 6.3-29)
- Construction of managed lanes along I-805 between SR-8 to SR-163 (TRANS 6.3-30)
- Construction of managed lanes along SR-94 between I-5 to I-805 (TRANS 6.3-31)

6.3.5.4 Ramp Meters

TRANS 6.3-33 The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations. Improvements could include additional lanes, interchange reconfiguration, etc.; however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. At the project-level, significant impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of fair share contribution or TDM measures that encourage carpooling and other alternative means of transportation consistent with proposed CPU policies. Fair share contributions may be provided at the project level for impacted ramps where the impacted facility is included in the SANDAG RP; however, at this time none of the impacted ramps are included in the SANDAG RP.

6.3.6 Significance after Mitigation

While implementation of the mitigation measures identified above would reduce impacts to less than significant at many of the intersections and roadway segments, only mitigation measures TRANS 6.3-7, TRANS 6.3-13 and TRANS 6.3-18 are included within the proposed North Park CPU and IFS. It is not likely that mitigation measures not included in the IFS would be implemented based on the lack of a funding mechanism and in some cases due to inconsistency of the recommended measure with the mobility goals of the proposed North Park CPU.

TRANS 6.3-7, TRANS 6.3-13 and TRANS 6.3-18 would be included in the IFS; however, full implementation of these measures cannot be guaranteed because the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring. Thus, impacts 6.3-7, 6.3-13 and 6.3-18 would remain significant and unavoidable.

Likewise, impacts to Caltrans facilities (freeway segments and ramps, Impacts 27-33) would remain significant and unmitigated because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur.

6.4 Air Quality

An Air Quality Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates (CPUs) was prepared by RECON (May 16, 2016). This report addresses air quality impacts associated with the proposed North Park CPU and associated discretionary actions. The report is included as Appendix D to this draft Program Environmental Impact Report and forms the basis for the discussion in this section.

6.4.1 Existing Conditions

The existing environmental setting and regulatory framework related to Air Quality is summarized in Chapters 2.0 and 5.0, respectively.

6.4.2 Significance Determination Thresholds

CEQA Guidelines

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G, the City of San Diego CEQA Significance Determination Thresholds (2011), and applicable air district standards described below. Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. A significant impact could occur if implementation of a proposed CPU would:

1) Conflict or obstruct implementation of the applicable air quality plan;

2) Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;

3) Expose sensitive receptors to substantial pollutant concentrations, including toxins; or

4) Create objectionable odors affecting a substantial number of people.

San Diego Air Pollution Control District

a. Air Quality Standards

Regarding question 2 above, the San Diego Air Pollution Control District (APCD) has established trigger levels that determine when a new or modified stationary source would require an air quality analysis. These trigger levels are utilized by the City of San Diego in their Significance Determination

Thresholds (City of San Diego 2011) as one of the considerations when determining the potential significance of air quality impacts for projects within the City. These thresholds would be applicable to future, individual development projects implemented within the proposed North Park CPU area. The air quality impact screening levels applicable to future development within the proposed North Park CPU area are shown in Table 6.4-1.

Table 6.4-1
Air Quality Impact Screening Levels

	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
NO_X	25	250	40
SO_X	25	250	40
CO	100	550	100
PM_{10}	--	100	15
Lead	--	3.2	0.6
VOC, ROG[1]	--	137[2]	15
$PM_{2.5}$	--	100[3]	--

SOURCE: APCD, Rule 20.2 (12/17/1998); City of San Diego 2011.

[1] The terms reactive organic gases (ROG) and volatile organic compounds (VOC) are essentially synonymous and are used interchangeably.

[2] VOC threshold are based on levels per the South Coast Air Quality Management District (SCAQMD) and Monterey Bay Air Pollution Control District, which have similar federal and state attainment status as San Diego.

[3] $PM_{2.5}$ threshold developed from the SCAQMD *Final Methodology to Calculate $PM_{2.5}$ and $PM_{2.5}$ Significance Thresholds* (SCAQMD 2006) and the PM_{10} standard of the San Diego APCD.

The above thresholds are applicable to individual development projects and not a program-level analysis such as the proposed North Park CPU. The project level thresholds are intended to ensure that many individual projects would not obstruct the timely attainment of the national and state Ambient Air Quality Standards (AAQS). Generally, discretionary, program-level planning activities, such as general plans, community plans, and specific plans, are evaluated for consistency with the local air quality plans as a measure of significance.

b. Toxic Air Emissions

Regarding toxic air emissions (Issue 3), for APCD permitted projects in general, the APCD does not identify a significant impact if the potential health risks from the proposed project would not exceed the health risk public notification thresholds specified by APCD Rule 1210. The public notification thresholds are:

- Maximum incremental cancer risks equal to or greater than ten in one million, or
- Cancer burden equal to or greater than 1.0, or
- Total acute non-cancer health hazard index equal to or greater than 1.0, or
- Total chronic non-cancer health hazard index equal to or greater than 1.0.

Therefore, for the purposes of evaluating the potential health risks associated with the air toxics addressed in this assessment, a significant impact would occur if the worst-case incremental cancer risk was greater than or equal to ten in one million or if the worst-case total acute or chronic health hazard index was greater than or equal to one.

6.4.3 Impact Analysis

Issue 1 Conflicts with Air Quality Plans

Would the project conflict with or obstruct implementation of the applicable air quality plan?

As described in Chapter 5.0, Regulatory Framework, the California Clean Air Act requires air basins that are designated nonattainment of State AAQS for criteria pollutants prepare and implement plans to attain the standards by the earliest practicable date. The two pollutants addressed in the San Diego Regional Air Quality Strategy (RAQS) are volatile organic compounds (VOC) and nitrogen oxides (NOx), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the Transportation Control Measures were most recently adopted in 2009 as the air quality plan for the San Diego Air Basin (SDAB).

The basis for the RAQS is the distribution of population in the region as projected by San Diego Association of Governments (SANDAG). The APCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that propose development that is equal to or less than population growth projections and land use intensity are inherently consistent. Updating the adopted Community Plan to change development potential would not necessarily result in an inconsistency between the current air quality plans (that are based on the adopted Community Plan) and the proposed North Park CPU and associated discretionary actions. Since the focus of the RAQS is on emissions from the sources, not the actual land use, projects that propose development that is greater than anticipated in the growth projections warrant further analysis to determine consistency with RAQS and the State Implementation Plan (SIP). The consistency with the RAQS is further evaluated by comparing emissions that would occur under build-out of the adopted Community Plan to the emissions that would occur under build-out of the proposed North Park CPU.

The proposed North Park CPU would change the planned land use mix as follows:

- Increase the projected number of residential units by approximately seven percent; and,
- Decrease the amount of land designated for commercial development by approximately two percent.

To determine consistency with the air emission assumptions of the RAQS, the air emissions associated with planned land uses under the adopted Community Plan were compared to the air emissions associated with the land uses under the proposed North Park CPU. If the emissions of the proposed North Park CPU are less than those under the adopted Community Plan, the proposed North Park CPU would be considered consistent with the RAQS, which is the long-range air quality plan for the region.

As detailed in the Air Quality Analysis, Section 6.2.2 (Appendix D) and summarized under Issue 2 below, future operational emissions under the proposed North Park CPU would be greater than future operational emissions under the adopted Community Plan. This is due to the increase in

residential uses when compared to the adopted Community Plan. Therefore, emissions of ozone precursors (ROG and NO_x) would be greater than what is accounted for in the RAQS. Thus, the proposed North Park CPU would conflict with implementation of the RAQS, and could have a potentially significant impact on regional air quality.

Impact 6.4-1 The proposed North Park CPU would conflict with implementation of the RAQS, resulting a potentially significant impact on air quality.

Issue 2 Air Quality Standards

Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Air quality impacts can result from the construction and operation of a project. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development or local effects stemming from sensitive receivers being placed close to roadways or stationary sources. In the case of the proposed North Park CPU and associated discretionary actions, operational impacts are primarily due to emissions from mobile sources associated with the vehicular travel along the roadways. Construction and operational impacts of the proposed North Park CPU and associated discretionary actions are discussed below.

a. Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Air pollutants generated by the construction of projects within the proposed North Park CPU area would vary depending upon the number of projects occurring simultaneously and the size of each individual project. The exact number and timing of all development projects that could occur under the proposed North Park CPU is unknown. However, since the area is heavily developed, it can be assumed that the proposed North Park CPU area would experience relatively small projects in terms of land area, most of which would involve the demolition of existing structures and improvements.

To illustrate the range of potential construction-related air quality impacts from projects that could occur, three hypothetical projects were evaluated. The size and scope of these hypothetical projects were selected to reflect typical projects in heavily developed areas such as the North Park CPU area. Hypothetical projects include a 1.8-acre multi-family residential project, a 25,000-square-foot commercial project, and a 65,000-square-foot light industrial project. The 1.8-acre multi-family development is assumed to consist of the demolition of an existing 5,000-square-foot structure and the construction of a 29-unit multi-family structure. The commercial development is assumed to

consist of the demolition of an existing 5,000-square-foot structure and the construction of 25,000 square feet of commercial use. The light industrial development is assumed to consist of the demolition of an existing 5,000-square-foot structure and the construction of 65,000 square feet of industrial use.

Air emissions were calculated using California Emissions Estimator Model 2013.2.2 (CalEEMod). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. The model estimates mass emissions from two basics sources: construction sources and operational sources (i.e., area and mobile sources). CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys performed by the South Coast Air Quality Management District and the Sacramento Metropolitan Air Quality Management District of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

CalEEMod estimates were used to develop construction scenarios based on typical construction that would occur with build-out of the proposed North Park CPU area. The analysis assumed that standard dust and emission control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with APCD Rule 55.0, Fugitive Dust Control. An architectural coating VOC limit of 150 grams per liter was used for all interior and exterior coatings to reflect the requirements of APCD Rule 67.

A summary of the modeling results for these sample projects is shown in Table 6.4-2.

Table 6.4-2. Sample Daily Construction Emissions (pounds/day)

Pollutant	Residential Project	Commercial Project	Industrial Project	Project-level Threshold
ROG	55	70	91	137
NO_X	29	14	29	250
CO	22	10	22	550
SO_2	0	0	0	250
PM_{10}	4	1	4	100
$PM_{2.5}$	3	1	3	100
NOTE: Due to rounding, the total PM emissions indicated in the CalEEMod output files				

Emissions summarized in Table 6.4-2 are the maximum emissions for each pollutant and they may occur during different phases of a construction project. They would not necessarily occur simultaneously. These are, therefore, the worst-case emissions. For assessing the significance of the air quality emissions resulting from construction of a hypothetical project, the construction emissions were compared to the thresholds shown in the far right column of Table 6.4-2. As shown, the hypothetical worst case individual projects would not result in air emissions that would exceed the applicable thresholds. Potential cumulative construction emissions are addressed below.

Typical daily construction emissions are presented to illustrate the potential scope of air impacts for projects that could be constructed under the proposed North Park CPU. Based on this analysis, individual projects constructed as part of build-out of the proposed North Park CPU area would not exceed air quality significance thresholds for construction. Additionally, the regulations at the federal, state, and local level provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. Based on the hypothetical worst case construction emission analysis, emissions associated with build-out of the proposed North Park CPU and associated discretionary actions at the project level would be less than significant.

Ministerial projects would not require environmental review. Generally, ministerial permits require a public official to determine only that the project conforms to applicable zoning and building code requirements and that applicable fees have been paid. These projects are generally smaller in size than those requiring discretionary review and would be smaller than the hypothetical projects evaluated in this analysis. As such, construction emissions associated with ministerial projects would be less than significant.

b. Operation

Operation emissions are long term and include mobile and area sources. Sources of operational emissions associated with future projects developed under the proposed North Park CPU and associated discretionary actions include:

- Traffic generated by the project.
- Area source emissions from the use of natural gas, fireplaces, and consumer products.

Air pollutants generated by all land uses within the proposed North Park CPU area were modeled based on average emissions from land use types. For the purposes of this analysis, it was assumed that the land use changes contained in the proposed North Park CPU and associated discretionary actions would be fully constructed in 2035. Actual emissions would vary depending on future projects and regulations within the North Park CPU area.

As with construction emissions, operational emission estimates were generated using CalEEMod. The proposed North Park CPU would result in the future development potential of 36,570 residential dwelling units and 3,195,000 square feet of development, which is an increase of 11,545 residential dwelling units over what currently exists and a decrease of 295,640 square feet of development under what currently exists. Trip generation rates were based on the Institute of Transportation Engineers Trip Generation 8th Edition trip rates for each respective land use category, and trip lengths were based on the trip purpose and statewide averages. Area source emission assumptions considered that new residential uses would be constructed with natural gas fireplaces and included emissions due to use of consumer products and architectural coatings that have VOC content. Emissions associated with the use of landscape equipment were based on the number and types of equipment needed for the proposed land uses. Detailed modeling assumptions can be found in the Air Quality Analysis (Appendix D).

At the program level, the analysis looks at the emissions of build-out of the proposed North Park CPU and associated discretionary actions in relation to the adopted Community Plan to determine if the emissions would exceed the emissions estimates included in the RAQS. This is used to determine whether the build-out would obstruct attainment or result in an exceedance of ambient air quality standards that would result in the temporary or permanent exposure of persons to unhealthy concentrations of pollutants. As such, this analysis evaluates the potential for build-out of the proposed North Park CPU and associated discretionary actions to result in, or contribute to, a violation of any air quality standard based on the change in pollutant emissions that would result from build-out of the adopted Community Plan in the year 2035 compared to the proposed North Park CPU and associated discretionary actions in the year 2035. Table 6.4-3 summarizes the estimated maximum emissions for the proposed North Park CPU and associated discretionary actions by source. As shown in Table 6.4-3, operational emissions associated with the proposed North Park CPU and associated discretionary actions would be greater for all pollutants when compared to the adopted Community Plan. Additionally, the proposed North Park CPU would result in emissions in excess of project-level thresholds (see Table 6.4-1).

The regulations at the federal, state, and local levels provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects also includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. In general, implementation of the policies in the proposed North Park CPU and General Plan would preclude or reduce air quality impacts. However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. Because the proposed North Park CPU would conflict with implementation of the RAQS, air emissions associated with the adoption of the proposed North Park CPU could have a potentially significant impact on regional air quality.

Table 6.4-3
Total Operational Emissions for the North Park CPU Area

Condition	Source	Pollutant (pounds per day)					
		ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Adopted Community Plan	Area	1,382	33	2,823	0	57	57
	Energy	14	119	54	1	10	10
	Mobile	766	1,256	7,264	27	1,947	540
	Total	2,162	1,407	10,141	28	2,013	606
Proposed CPU and Associated Discretionary Actions	Area	1,459	35	3,010	0	61	60
	Energy	15	125	56	1	10	10
	Mobile	793	1,306	7,549	28	2,029	562
	Total	2,267	1,466	10,615	29	2,100	633
Change		105	59	474	1	86	27

Impact 6.4-2 Build-out of the proposed North Park CPU would result in operational emissions in excess of the assumptions used in the RAQS and would exceed regional air quality standards, resulting a potentially significant impact on air quality.

Issue 3 Sensitive Receptors

Would the project expose sensitive receptors to substantial pollutant concentrations, including toxins?

a. Localized Carbon Monoxide Hot Spots Impacts

Localized carbon monoxide (CO) concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions, CO concentrations may reach unhealthy levels with respect to local sensitive land uses.

The SDAB is a CO maintenance area under the federal CAA. This means that SDAB was previously a nonattainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards. According to the CO Protocol, in maintenance areas, only projects that are likely to worsen air quality necessitate further analysis. The CO Protocol indicates projects may worsen air quality if they worsen traffic flow, defined as increasing average delay at signalized intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the project to operate at LOS E or F.

The traffic impact study and subsequent traffic memo prepared for the proposed North Park CPU and associated discretionary actions (Appendices B and C, respectively) concluded that nine intersections in the North Park CPU area would operate at LOS E or worse. Based on the CO Protocol, the three worst signalized intersections in the North Park CPU area were selected for a detailed CO hot spot analysis. These intersections are listed in Table 6.4-4. A computer air emission dispersion model, CALINE4, was used to calculate CO concentrations at receivers located at each intersection. These concentrations were derived from inputs including traffic volumes from the proposed North Park CPU and associated discretionary actions traffic analysis and emission factors from EMFAC2014. The results of the modeling for these three intersections in the North Park CPU area are summarized in Table 6.4-4.

Table 6.4-4.
Maximum Build-out CO Concentrations in the North Park CPU Area

Roadway	1-Hour CO ppm	1-Hour CO Standard CAAQS/ NAAQS	8-Hour CO ppm[1]	8-Hour CO Standard CAAQS/ NAAQS
Madison Ave & Texas St.	4.2	9.0/9	2.9	20/35
El Cajon Blvd & I-805 SB Ramps	4.8		3.4	
University Ave & I-805 NB Ramps	5.0		3.5	

[1] 8-hour concentrations developed based on a 0.7 persistence factor
I-805 = Interstate 805, NB = northbound, SB = southbound

As shown, the maximum 1-hour concentration would be 5.0 parts per million (ppm). This concentration is below the federal and state 1-hour standards. In order to determine the 8-hour

concentration, the 1-hour value was multiplied by a persistence factor of 0.7, as recommended in the CO Protocol. Based on this calculation, the maximum 8-hour concentration would be 3.5 ppm. Thus, increases of CO due to the proposed North Park CPU and associated discretionary actions would be below the federal and state 8-hour standards. Therefore, there would be no harmful concentrations of CO within the North Park CPU area, and localized CO emissions would be less than significant.

b. Toxic Air Emissions

An assessment was completed to evaluate the potential effects associated with placing sensitive land uses in the vicinity of existing sources of air pollution. In the case of the proposed North Park CPU and associated discretionary actions, this source of air pollution is vehicle traffic on freeways Therefore, this assessment discloses the maximum potential health risks (residential and worker) within the North Park CPU area due to these existing external sources.

Stationary Sources

The proposed North Park CPU and associated discretionary actions include land uses that may generate air pollutants affecting adjacent sensitive land uses. In air quality terms, individual land uses that emit air pollutants in sufficient quantities are known as stationary sources. The primary concern with stationary sources is local; however, they also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources are regulated by the local air pollution control or management district through the issuance of permits; in this case, the agency is the APCD.

The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In accordance with Assembly Bill 2588, if adverse health impacts exceeding public notification levels are identified, the facility would provide public notice; and if the facility poses a potentially significant public health risk, the facility must submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Thus, with this regulatory framework, at the program level, impacts associated with stationary sources in the North Park CPU area would be less than significant.

Mobile Sources

Diesel particulate matter has been identified as an air toxic of concern. Vehicles (primarily heavy-duty trucks) emit diesel particulates through the combustion of diesel fuel. An assessment of the potential health risks associated with the anticipated diesel particulate emissions was performed for receivers in the CPU area. Due to traffic volumes, the analysis focuses on emissions from vehicle traffic on freeways (Interstate 805, Interstate 15, and State Route 94).

Unlike stationary sources, local agencies, such as the APCD, do not regulate roadways as emission sources. While the California Air Resources Board (CARB) regulates vehicle emissions and fuel formulations, the source of the majority of diesel particulate matter is regulated nationwide by the U.S. Environmental Protection Agency. To determine the exposure of sensitive receptors to diesel particulate matter within the North Park CPU area, a model was created for all freeway sources in

the North Park CPU area. The results provide the total average annual diesel particulate matter concentrations at each modeled receiver. The resulting total average annual diesel particulate matter concentrations were then used to calculate the incremental cancer risk and chronic health hazard index at each receiver. The model, AERMOD, input and output data results are included and summarized below.

Carcinogenic Risk

Carcinogenic risk characterization estimates the probability that cancer will occur in an individual in a potentially exposed population. There is no adopted standard for evaluating the diesel particulate matter emission impacts due to vehicles traveling on local roadway and freeways. Therefore, a significance threshold of ten in one million annual concentration of diesel particulate matter was used in evaluating the potential impacts from the vehicular sources. Diesel particulate matter concentrations can be equated to carcinogenic risk to determine significance of an impact. Carcinogenic health risk is determined by calculating lifetime average daily exposure based on a variety of factors such as respiration rate, body weight, and pollutant concentration. Specific methodology for determining carcinogenic risk is described in the Air Quality Analysis, Section 5.0 (Appendix D).

The average annual concentration of diesel particulates at each modeled receiver was calculated using air dispersion models as detailed in Section 5.3.2.2 of the Air Quality Analysis (Appendix D). Contours of the particulate matter less than 10 microns in diameter (PM_{10}) annual maximum annual concentrations for the North Park CPU area are shown in Figure 6.4-1. The worst-case residential incremental increase in cancer risk due to diesel particulate matter emissions associated with increased traffic on local freeways in the North Park CPU area is 0.29 in one million and occurs in proximity to the Interstate 15 and State Route 94 interchange. The location of the North Park maximally exposed individual resident and maximally exposed individual worker locations are shown on Figure 6.4-1. The maximum diesel particulate matter concentrations, higher than at these locations, occur within the Interstate 15 right-of-way. This high-end residential incremental cancer risk is less than the significance threshold of 10 in one million cancer risk. Exposure associated with the 65th percentile, 80th percentile, and worker incremental cancer risks at this location would be less than the 95th percentile value. Therefore, the incremental increase in cancer risks to sensitive receivers associated with build-out of the proposed North Park CPU and associated discretionary actions would be less than significant.

Chronic Risk

Chronic risk is a long-term, non-carcinogenic health risk. Characterization of these risks is performed by comparing the estimated annual air concentrations of the substance (pollutant) to a reference exposure level. A chronic hazard quotient is obtained by dividing the average annual concentration by the reference exposure level. The hazard index provides a measure of total potential chronic non-carcinogenic health effects and is calculated for each receiver by summing the hazard quotients for all individual substances that impact the same toxicological endpoint. The analysis conducted for the proposed North Park CPU and associated discretionary actions considered inhalation diesel particulate matter. When an individual hazard quotient is less than or equal to one, no adverse chronic non-carcinogenic health effects are expected from that substance. Similarly, if the hazard

Image source: SanGIS (flown May 2012)

North Park Community Plan Boundary

PM10 Annual Concentration
Maximum Level

- 0.00002
- 0.00003
- 0.00004
- 0.00005
- 0.00007
- 0.00009
- 0.0001
- 0.0002
- 0.00024

Maximum Exposed Individual Worker

Maximum Exposed Individual Resident

0 Feet 1,400

FIGURE 6.4-1
2035 Annual PM Concentrations from Freeway Operations – North Park

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index is greater than one, chronic non-carcinogenic effects resulting from exposure to the substances emitted may be possible.

The results of the chronic health risk modeling analysis completed for the proposed North Park CPU and associated discretionary actions indicate that the worst-case chronic health hazard index due to diesel particulate matter from the freeways would be approximately 0.1 or less in 2035. Thus, the 2035 chronic health hazard index would be less than one at all locations within the North Park CPU area and would not result in adverse chronic health effects. Therefore, this represents a less than significant chronic health impact.

Based on the preceding analysis, the proposed North Park CPU and associated discretionary actions would result in a less than significant impact related to exposure of sensitive receptors to carbon monoxide hot spots and toxic air emissions.

Issue 4 Odors

Would the project create objectionable odors affecting a substantial number of people?

A potential odor impact can occur from two different situations: 1) development associated with build-out of the proposed North Park CPU and associated discretionary actions would introduce receptors in a location where they would be affected by an existing or future planned odor source, or 2) proposed uses within the North Park CPU area would generate odors that could adversely affect a substantial number of persons.

The proposed North Park CPU and associated discretionary actions would allow for development of single-family residential, multi-family residential, commercial, institutional, hotel, and park and open space land uses within the North Park CPU area. While specific future land uses within the North Park CPU are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation. The proposed North Park CPU applies land uses based on the developed nature of the North Park CPU area that includes residential uses in close proximity to commercial areas. Thus, build-out of the proposed North Park CPU and associated discretionary actions are not anticipated to introduce land uses that would generate substantial odor. A typical use in the North Park CPU area that would generate odors would be restaurants. Restaurants can create odors from cooking activities, but would not generally be considered adverse. Odors associated with restaurants or other commercial uses would be similar to existing residential and commercial/food service uses throughout the North Park CPU area. Odor generation is generally confined to the immediate vicinity of the source. Thus, implementation of the proposed North Park CPU and associated discretionary actions would not create operation-related objectionable odors affecting a substantial number of people within the City.

Cumulative Impact Analysis

a. Issue 1 Air Quality Plans

For purposes of Issue 1, the cumulative study area would be considered the SDAB. Since the analysis provided under Issue 1 is a discussion of consistency with the air quality plan for the SDAB (i.e., the RAQS), the analysis provided a cumulative analysis by nature since it considers consistency of the project with a regional air quality plan that relies on the land use plans of jurisdictions within the basin. As discussed above, the proposed North Park CPU and associated discretionary actions would generate more air emissions than the air emissions associated with build-out of the adopted Community Plan. Thus, the proposed North Park CPU and associated discretionary actions would result in emissions more than what were anticipated when the RAQS were developed and the proposed North Park CPU and associated discretionary actions would conflict with implementation of the air quality plan. Thus, cumulative impacts related to conflicts with air quality plans would be significant.

b. Issue 2 Air Quality Standards

Construction

As shown in Table 6.4-2 above, the hypothetical worst case individual projects would not result in air emissions that would exceed the applicable thresholds. However, if several of these projects were to occur simultaneously, there is the potential to exceed significance thresholds. However, in order for projects being constructed simultaneously to exceed construction emissions thresholds, the projects would have to be larger scale and in close proximity to each other. While unlikely to occur based on the fact that the North Park CPU area is largely built out, future environmental review for these larger projects would allow for a site-specific analysis of construction-level air quality emissions to ensure projects are appropriately phased and timed to avoid such cumulative construction emissions. Thus, with implementation of the existing regulatory framework, cumulative construction emissions would be less than significant.

Operation

Regarding operational emissions, for purposes of this program-level analysis, consistency with the RAQS was considered the applicable threshold since the City's project-specific air quality impact screening levels shown in Table 6.4.1 would not be applicable to a communitywide plan update. As discussed, build-out of the proposed North Park CPU area would result in emissions higher than what was used in the assumptions used to develop the RAQS; thus, overall build-out of the proposed North Park CPU area would result in potentially significant operational emission impacts. Since the RAQS are established for the SDAB, which is the cumulative study area for air quality emissions, build-out of the land uses within the North Park CPU area would have the potential to result in a significant cumulative impact. Thus, cumulative operational emissions associated with build-out of the proposed North Park CPU and associated discretionary actions would be potentially significant.

c. Issue 3 Sensitive Receptors

CO Hot Spots

The CO hot spot analysis evaluated three intersections in the North Park CPU area. The hot spot analysis indicated that the increases of CO due to the implementation of the CPU would be below the federal and state 1-hour and 8-hour standards. Since CO hot spots are a localized phenomenon, development within other community plans would not contribute to a cumulative CO hot spot impact.

Toxic Air Emissions

As discussed under Issue 2 above, the APCD would require an emissions inventory and health risk assessment in accordance with Assembly Bill 2588 prior to issuance of any permits to construct or operate a stationary emission source. These requirements would extend to land uses within the North Park CPU area in addition to land uses within the SDAB as a whole. Thus, existing laws are in place that require evaluation and reduction of risks for individual projects developed in accordance with applicable land use plans. Site-specific evaluation of health risks associated with stationary sources cannot be conducted at this level of review, as the project does not include specific development proposals. Nevertheless, existing regulations would ensure that cumulative impacts associated with stationary sources of toxic air emissions would be less than significant as build-out of the plan occurs.

As discussed above under Issue 3, the carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than ten in a million within the North Park CPU area and the non-carcinogenic risks from PM_{10} are measured to have a maximum chronic hazard index below the significance threshold of one. Development of cumulative projects within the SDAB would not exacerbate health effects since the evaluation is location-specific considering exposure to contaminants at a specific location. Therefore, the cumulative carcinogenic and non-carcinogenic toxic air emissions from exposure of residents to diesel particulate matter emissions would be less than significant.

d. Issue 4 Odors

For purposes of odor impacts, build-out of the three Community Plans, North Park, Golden Hill, and Uptown is considered within the cumulative analysis. Implementation of the CPUs would not result in a significant cumulative odor impact because the CPUs and associated discretionary actions would result in single-family residential, multi-family residential, commercial, and park and open space land uses. These uses are not associated with generation of substantial odors. Additionally, odors are typically confined to the immediate area surrounding their source and thus, individual odor sources would not combine to produce a cumulative impact. Thus, objectionable odors affecting a substantial number of people within the City would not result, and cumulative odor impacts would be less than significant.

6.4.4 Significance of Impacts

Future operational emissions associated with the proposed North Park CPU would be greater than anticipated ~~for~~ future operational emissions under the adopted Community Plan. Therefore, emissions of ozone precursors (ROG and NO_x) would be greater than what is accounted for in the RAQS. Thus, the proposed North Park CPU would conflict with implementation of the RAQS, and could have a potentially significant impact on regional air quality (Impact 6.4-1). Because the significant air impact stems from an inconsistency between the proposed North Park CPU and the adopted land use plans upon which the RAQS was based, the only measure that can lessen this effect is the revision of the RAQS and SIP based on the revised proposed North Park CPU.

Operational emissions associated with the proposed North Park CPU would be greater for all pollutants when compared to the adopted Community Plan. Additionally, the proposed North Park CPU would result in emissions in excess of project-level thresholds. Thus, the proposed North Park CPU would have a potentially significant impact on regional air quality (Impact 6.4-2).

Impacts to sensitive receptors would be less than significant because increases in CO at affected intersections would be below the federal and state 1-hour and 8-hour standards. Additionally, carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than the applicable threshold, and non-carcinogenic risks from diesel particulate matter would be below the maximum chronic hazard index. Thus, impacts would be less than significant and no mitigation is required.

Odor impacts would be less than significant as the proposed North Park CPU and associated discretionary actions do not propose land uses associated with generation of adverse odors. No mitigation is required

6.4.5 Mitigation Measures

Impacts of build-out of the proposed North Park CPU and associated discretionary actions related to conflicts with air quality plans and air quality standards would be significant without mitigation (Impacts 6.4-1 and 6.4-2). The following mitigation measures would be implemented to address the potential impacts:

AQ 6.4-1 Prior to the next update of the RAQS and within six months of the certification of the Final PEIR, the City shall provide a revised land use map for the North Park CPU area to SANDAG to ensure that any revisions to the population and employment projections used by APCD in updating the RAQS and the SIP will accurately reflect anticipated growth due to the proposed North Park CPU.

AQ 6.4-2 Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact.

6.4.6 Significance after Mitigation

Regarding impact 6.4-1, mitigation measure AQ 6.4-1 would provide SANDAG with an updated land use map to assist SANDAG in revising the housing forecasts; however, until the anticipated growth is included in the emission estimates of the RAQS and the SIP, direct and cumulative impacts relative to conformance with the RAQS would remain significant and unavoidable. It should be noted that the APCD may revise an emission reduction strategy if the district demonstrates to CARB, and CARB finds, that the modified strategy is at least as effective in improving air quality as the strategy being replaced. The last RAQS was adopted in 2009 and only accounts for the transportation and land use plans that were in place at the time of its adoption. Thus, even with implementation of mitigation measure AQ 6.4-1, impacts related to conflicts with the applicable air quality plan would remain significant and unavoidable.

Regarding impact 6.4-2, while identified regulations would reduce emissions and may preclude many potential impacts, project-level emissions information is not available at this time and it cannot be guaranteed that operational air emissions from the future developments within the planning area could be fully mitigated to below a level of significance even with implementation of mitigation measure AQ 6.4-2. Therefore, impacts related to exceedance of air quality standards associated with build-out of the North Park CPU would be significant and unavoidable at the program level.

6.5 Greenhouse Gas Emissions

A Greenhouse Gas Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates (CPUs) was prepared by RECON (September 18, 2015). A Supplemental Analysis to the Greenhouse Gas Analysis for Uptown, North Park, and Golden Hill Community Plan Updates was prepared by RECON on May 16, 2016. These reports address greenhouse gas emissions and impacts associated with the proposed North Park CPU and associated discretionary actions. The reports are included as Appendix E-1 and E-2, respectively, to this draft Program Environmental Impact Report and form the basis for the discussion in this section.

6.5.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

6.5.1.1 Methodology and Assumptions

Annual greenhouse gas (GHG) emissions due to the operation of build-out of the Community Plan area under the adopted and proposed plans were calculated using California Emissions Estimator Model (CalEEMod; CAPCOA 2013). The emissions sources include construction (off-road vehicles), mobile (on-road vehicles), area (fireplaces, consumer products [cleansers, aerosols, and solvents], landscape maintenance equipment, and architectural coatings), water and wastewater, and solid waste sources. Where project-specific data were not available, model inputs were based on information provided in the CalEEMod User's Guide (CAPCOA 2013).

GHG emissions are estimated in terms of metric tons of carbon dioxide equivalent (MT CO_2E). CO_2E emissions are the preferred way to assess combined GHG emissions because they give weight to the global-warming potential (GWP) of different gases. The GWP is the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of carbon dioxide (CO_2). As example, CO_2 has a GWP of 1, methane (CH_4) has a GWP of 21, and nitrous oxide (N_2O) has a GWP of 310, which means that CH_4 and N_2O have 21 and 310 times greater global warming effect than CO_2, respectively.

a. Estimating Construction Emissions

At a program level, it would be speculative to estimate the schedule and construction requirements of individual projects that could occur in the North Park CPU area. Thus, this analysis relies on the methodology used in the San Diego County Updated Greenhouse Gas Inventory (San Diego County 2013), which forecasts that between 2015 and 2035 construction emissions would comprise roughly

2.1 percent of total GHG emissions within the county. Therefore, construction emissions are estimated at 2.1 percent of the total operational GHG emissions associated with the planning area.

b. Estimating Vehicle Emissions

Vehicle emissions are calculated based on the vehicle type, the trip rate, and trip length for each land use. The vehicle emission factors and fleet mix used in CalEEMod are derived from California Air Resources Board's (CARB) Emission Factors 2011 model, which includes GHG reducing effects from the implementation of Pavley I (Clean Car Standards) and the Low Carbon Fuel Standard, and are thus considered in the calculation of emissions. Emission factors that include the effects of the Tire Pressure Program and the Low Emission Vehicles III regulations are not available. Therefore, to account for the effects of the Tire Pressure Program (0.6 percent) and the Low Emission Vehicles III (2.4 percent), a total 3 percent reduction was applied to the vehicle emissions calculated in CalEEMod (CARB 2011a).

The proposed North Park CPU encourages increased development diversity by increasing commercial and multi-family land uses and decreasing the planned number of single-family residences. Locating different land use types near one another can decrease vehicle miles traveled (VMT), as trips between land use types are shorter and may be accommodated by alternative modes of transportation (CAPCOA 2010). This reduction was calculated using methodology from California Air Pollution Control Officers Association's (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010). By increasing residential density, especially within proximity of transit and commercial services, people's travel distances are affected and greater options for the mode of travel are provided. This can result in a substantial reduction in VMT depending on the change in density compared to a typical urban residential density (CAPCOA 2010). By increasing the diversity of land uses, a similar reduction in VMT can occur, because trips between land use types would be shorter and may be accommodated by non-auto modes of transport. Also, by increasing transit accessibility (e.g., by locating a high-density project near transit), a shift in travel mode is facilitated along with reduced VMT. The effectiveness of these land-use strategies ranges from less than 1 percent up to a maximum 30 percent reduction in communitywide VMT and are not additive (CAPCOA 2010). For example, where high-density mixed use development is located within a 5- to 10-minute walk from a transit station with high-frequency transit or bus service and is combined with walkable and bicycle-friendly neighborhood design, a total VMT reduction up to 24 percent can be achieved (CAPCOA 2010). The proposed North Park CPU's focus on community walkability and bikeability, diversity of land uses, and development of higher densities near job centers (downtown San Diego) was included in the emission calculations. Based on a review of mapping, the average distance from areas with increased residential density to the nearest major job center, downtown San Diego, is approximately 3.0 miles for the North Park CPU area. The proposed North Park CPU and associated discretionary actions propose an increase in multi-family residences. The VMT from residents of these new developments would be less due to the reduced trip lengths. Although this reduction was only counted for new development proposed under the proposed North Park CPU and associated discretionary actions, this would reduce overall mobile emissions by 4.4 percent in the North Park CPU area.

c. Estimating Energy Use Emissions

CalEEMod estimates GHG emissions from energy use by multiplying average rates of residential and non-residential energy consumption by the quantities of residential units and non-residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider.

Building energy use is typically divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as plug-in appliances. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in energy use," can be further subdivided by specific end-use (refrigeration, cooking, office equipment, etc.).

Energy consumption values are based on the California Energy Commission (CEC) sponsored *California Commercial End Use Survey and Residential Appliance Saturation Survey* studies, which identify energy use by building type and climate zone. Because these studies are based on older buildings, adjustments have been made in CalEEMod to account for changes to Title 24 Building Codes. CalEEMod is based on the 2008 Title 24 energy code (Part 6 of the Building Code).

As identified by the CEC, the Energy Code requires various improvements in the built environment that would achieve a 21.8 percent increase in electricity efficiency and a 16.8 percent increase in natural gas efficiency in non-residential buildings, a 36.4 percent increase in electricity efficiency and a 6.5 percent increase in natural gas efficiency in single-family uses, and a 23.3 percent increase in electricity efficiency and a 3.8 percent increase in natural gas efficiency in multi-family uses (CEC 2013).

The North Park CPU area would be served by San Diego Gas & Electric (SDG&E). Therefore, SDG&E's specific energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) are used in the calculations of GHG emissions. The state mandate for renewable energy is 33 percent by 2020 and 50 percent by 2030 (RECON 2015). However, the energy intensity factors included in CalEEMod by default only represent a 10.2 percent procurement of renewable energy (SDG&E 2011). SDG&E currently has procured 36.4 percent and would achieve 50 percent by 2030. To account for the continuing effects of Renewables Portfolio Standard (RPS) through 2020, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by SDG&E. SDG&E energy intensity factors that include this reduction are shown in Table 6.5-1.

Table 6.5-1
San Diego Gas & Electric Intensity Factors

GHG	2009 (lbs/MWh)	2016 (lbs/MWh)	2020 (lbs/MWh)	2035 (lbs/MWh)
Carbon dioxide (CO_2)	720.49	531.72	531.72	433.73
Methane (CH_4)	0.029	0.021	0.021	0.017
Nitrous oxide (N_2O)	0.006	0.004	0.004	0.004

SOURCE: SDG&E 2011.
lbs = pounds
MWh = megawatt hour

d. Estimating Area Source Emissions

Area sources include GHG emissions that would occur from the use of landscaping equipment. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. The landscaping equipment emission values were derived from the 2011 In-Use Off-Road Equipment Inventory Model (CARB 2011b).

e. Estimating Water and Wastewater Emissions

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH_4 and N_2O.

The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California* 2003 (as cited in CAPCOA 2013). Based on that report, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use (CAPCOA 2013).

Development would be subject to California Green Building Standards Code (CalGreen), which requires a 20 percent increase in indoor water use efficiency. Thus, in order to demonstrate compliance with CalGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations.

In addition to water reductions under CalGreen, the GHG emissions from the energy used to transport the water are affected by RPS. As discussed previously, to account for the effects of RPS through 2020 and 2030, the energy intensity factors included in CalEEMod were reduced by the values shown in Table 6.5-1.

f. Estimating Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. To calculate the GHG emissions generated by disposing of solid waste for the project, the total volume of solid waste was calculated using waste disposal rates identified by California Department of Resources Recycling and Recovery. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change (IPCC) method using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters. No solid waste reductions were modeled.

6.5.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to GHG emissions are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G. A significant impact could occur if implementation of a proposed CPU would:

1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

2) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs.

As stated in the Guidelines, these questions are "intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance" (Title 14, Division 6, Chapter 3 Guidelines for Implementation of the CEQA, Appendix G, VII Greenhouse Gas Emissions). The CEQA Guidelines require lead agencies to adopt GHG thresholds of significance. When adopting these thresholds, the Guidelines allow lead agencies to develop their own significance threshold and/or to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence.

Section 15064.4 of the CEQA Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

(a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

(1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or

(2) Rely on a qualitative analysis or performance-based standards.

While calculation of a project's contribution to greenhouse gas emissions is required, the CEQA Guidelines do not establish a standard by which to judge a significant effect or a means to establish such a standard. In order to determine significance of the impacts associated with implementation of the proposed North Park CPU and associated discretionary actions, an inventory was developed based on the land use designations associated with the adopted Community Plan. Emissions from the proposed North Park CPU were then compared to the existing GHG emissions inventory and the GHG emissions inventory for the adopted Community Plan. If emissions from build-out of the proposed North Park CPU and associated discretionary actions are less than those that would be generated by build-out of the adopted Community Plan, impacts related to GHG emissions would be less than significant provided the proposed North Park CPU and associated discretionary actions implement the land use-related strategies identified in the Climate Action Plan (CAP). If emissions from build-out of the proposed North Park CPU and associated discretionary actions are greater than those of the adopted Community Plan, impacts related to GHG emissions could still be less than significant if the increase in GHG emissions is a direct result of implementing CAP strategies and the General Plan's City of Villages Strategy.

As discussed in the context of regulatory plans and policies in Section 5.5, implementation of the City's CAP would result in Citywide GHG reductions consistent with its proportionate share of Statewide GHG emissions targets. The CAP assumes future population and economic growth based on the community plans that were in effect at the time the CAP was being developed. Therefore, community plan updates that would result in a reduction in GHG at build-out compared to GHG emissions at build-out under the adopted Community Plan would result in further GHG reductions. However, the CAP is a Citywide program and the General Plan City of Villages Strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to the regional transit system. Concentrating new growth in an area can result in greater GHG emissions than allowing less intensive land uses to remain. Thus, consistency with the City of Villages Strategy can result in specific areas having an increase in GHG emissions, while Citywide a decrease of GHG emissions may occur. To address this phenomenon, this section takes a two-tiered approach in discussing GHG emissions: 1) a quantitative analysis of the existing conditions, build-out of the adopted Community Plan, and build-out of the proposed North Park CPU and associated discretionary actions; and 2) a discussion of whether or not the proposed North Park CPU and associated discretionary actions are consistent with the CAP.

6.5.3 Impact Analysis

6.5.3.1 Issue 1 Greenhouse Gas Emissions

Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As compared to the existing land uses, the proposed North Park CPU and associated discretionary actions would reduce industrial, institutional, recreational, and single-family residential land uses while increasing the development of commercial uses and multi-family dwelling units. This change represents an increase in land use types and density in the CPU area. Table 6.5-2 summarizes the land use distribution for the North Park CPU area for existing conditions, the adopted Community Plan, and the proposed North Park CPU and associated discretionary actions.

Table 6.5-2 Land Use Distribution			
Land Use	Existing Land Use	Adopted Community Plan	Proposed Community Plan
Residential (dwelling units)			
Single-Family	5,797	5,116	5,117
Multi-Family[1]	19,228	29,179	31,453
SUBTOTAL[2]	25,025	34,295	36,570
Non-Residential (square feet)			
Commercial	2,302,110	2,175,460	2,138,210
Industrial	42,850	-	-
Institutional	909,380	870,440	870,440
Hotels	163,866	158,870	158,870
Recreation	72,430	27,460	27,450
SUBTOTAL[2]	**3,490,640**	**3,232,230**	**3,195,000**

[1]All dwelling units that are not single-family were counted as multi-family. This includes dwelling units on other land uses such as commercial and institutional.
[2]Total area may not match the sum of listed areas due to rounding.

Based on the methodology summarized above, GHG emissions were calculated for the existing (on the ground) land uses, the land uses at build-out of the adopted Community Plan (in 2035, and the land uses at build-out of the proposed North Park CPU and associated discretionary actions (in 2035). Table 6.5-3 summarizes the GHG emissions under each scenario.

Table 6.5-3 GHG Emissions for the North Park Community Plan Area (MT CO_2E per Year)			
Emission Source	Existing	Adopted Community Plan	Proposed CPU
Vehicles	307,279	279,599	291,530
Energy Use	63,047	61,372	64,163
Area Sources	18,158	24,883	26,534
Solid Waste Disposal	10,840	12,254	12,712
Water Use	12,136	11,394	12,039
Construction	--	8,179	8,547
TOTAL	411,460	397,672	415,525

As shown in the above table, GHG emissions would be greater for the proposed North Park CPU and associated discretionary actions than for the adopted Community Plan. Emissions from all sources would increase from the adopted Community Plan to the proposed North Park CPU and associated discretionary actions. This is because, as shown in Table 6.5-2, the proposed North Park CPU and associated discretionary actions would include an additional 2,275 multi-family dwelling units over the adopted Community Plan. The majority of the new multi-family dwelling units are planned either within, or within a 0.5-mile radius of, a Community Village Center.

The proposed North Park CPU includes two Community Villages, which the General Plan defines as a community-oriented area with local commercial, office, and multi-family residential uses, including some structures with office or residential space above commercial space. The 30th Street and University Avenue Village is centered at the University Avenue and 30th Street intersection and includes most of the commercial properties along University Avenue between Idaho Street and Bancroft Street. It includes a number of commercial and retail uses, multi-family housing within mixed-use developments, the historic North Park Theater, a designated mini-park, and a parking structure that serves the commercial district. The 30th Street and El Cajon Boulevard Village is centered at the intersection of 30th Street and El Cajon Boulevard. The proposed North Park CPU and associated discretionary actions would designate this area for high-density residential within mixed-use development to take advantage of this location at the intersection of two Key Corridors, as identified by the proposed North Park CPU. The Key Corridors consist of El Cajon Boulevard, University Avenue, 30th Street, Adams Avenue, and Park Boulevard.

By targeting new growth along transit corridors, within, or within a 0.5-mile radius of, a Community Village, the proposed North Park CPU would be consistent with the General Plan's City of Villages Strategy, and thus, with Action 3.1 of the CAP, which calls for implementation of the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas (TPAs) to increase use of transit. San Diego Association of Governments' (SANDAG's) 2050 Regional Transportation Plan includes a planned trolley line for El Cajon Boulevard with a planned stop at its intersection with 30th Street. The Mobility Element of the General Plan states that the City of Villages Strategy would support expansion of the transit system by calling for villages to be located in areas that can be served by high-quality transit. Increasing the density in the North Park Village areas would lay the groundwork for future transit use as well as provide riders for the existing transit network. By planning a Community Village at the intersection of 30th Street and El Cajon Boulevard, the proposed North Park CPU is consistent with the General Plan's Mobility Element Policy ME-B.1, which calls for increased transit service accessibility, and Policy ME-B.9, which calls for transit-supportive land use planning.

The GHG emissions analysis for the proposed North Park CPU and associated discretionary actions included a reduction factor for new development to account for increased transit use. This reduction factor was used for both new development under the adopted Community Plan and new development under the proposed North Park CPU and associated discretionary actions. Both the adopted Community Plan and the proposed North Park CPU and associated discretionary actions would add dwelling units and commercial uses over the existing conditions to a Village Center in a TPA; however, the proposed North Park CPU would add more dwelling units and commercial uses than the adopted Community Plan. Since the same reduction factor for transit was used for both the adopted Community Plan and the proposed North Park CPU, GHG emissions from new development were proportional to the amount of new dwelling units contained in each plan, i.e., the proposed North Park CPU did not get a larger reduction factor for public transit than the adopted Community Plan.

The proposed North Park CPU and associated discretionary actions would increase GHG emissions over those of the adopted Community Plan; however, this increase in GHG is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would

support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be less than significant.

6.5.3.2 Issue 2 Conflicts with Plans or Policies

Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The regulatory plans and policies discussed in Section 5.5 aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are, thus, largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments.

For the energy sector, the reduction strategies aim to: reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; and expand research and development.

a. Consistency with State Plans

Executive Order S-3-05 establishes GHG emission reduction targets for the state, and Assembly Bill 32 launched the Climate Change Scoping Plan that outlines the reduction measures needed to reach these targets. Out of the Recommended Actions contained in CARB's Scoping Plan, the actions that are most applicable to the North Park CPU would be Actions E-1 and GB-1. CARB Scoping Plan Action E-1, together with Action GB-1 (Green Building), aim to reduce electricity demand by increasing the efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The new construction associated with the proposed North Park CPU and associated discretionary actions would be required to include all mandatory green building measures under the CalGreen Code. Therefore, the proposed North Park CPU and associated discretionary actions would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

b. Consistency with Regional Plans

SANDAG's San Diego Forward: The Regional Plan

The proposed North Park CPU and associated discretionary actions would be consistent with the goals of the Regional Plan to develop compact, walkable and bicycle-friendly communities close to transit connections and consistent with smart growth principles. The proposed North Park CPU and associated discretionary actions would reinforce transit corridors, bicycle lanes and establish two pedestrian-oriented, urban, and mixed-use Community Villages that would reduce reliance on the automobile and promote walking and biking and the use of alternative transportation. The proposed North Park CPU supports the multi-modal strategy of the Regional Plan through the

designation of two villages along Key Corridors. Policies contained within the proposed North Park CPU Land Use and Mobility Elements would serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. These measures would be consistent with the Regional Plan's Sustainable Communities Strategy. Thus, no significant adverse environmental effects would result from the adoption of the proposed North Park CPU and associated discretionary actions in terms of consistency or conflicts with the Regional Plan.

c. Consistency with Local Plans

City of San Diego General Plan

Compared to the existing land uses, the proposed North Park CPU envisions reducing institutional, recreational, and single-family residential land uses and increasing commercial space and multi-family dwelling units. This would increase the diversity of land uses within the CPU area by encouraging "village-like" development consistent with the San Diego General Plan. The proposed North Park CPU and associated discretionary actions also support General Plan concepts including increased walkability, a higher level of alternative transportation use, and sustainable development and green building practices.

Policies within the Land Use Element of the proposed North Park CPU promote mixed-use development along major transportation corridors, specifically calling out 30th Street, El Cajon Boulevard, and University Avenue for a diversity of uses. Policies within the Mobility Element of the proposed North Park CPU promote multi-modal development, enhanced pedestrian and bicycle facilities, and active storefronts to increase pedestrian engagement. Policies within the Conservation Element of the proposed North Park CPU promote composting and the preservation of street trees. All of these policies correspond with policies set out by the General Plan. Thus, the proposed North Park CPU and associated discretionary actions would be consistent with the San Diego General Plan.

City of San Diego Climate Action Plan

New land use designations and policies within the proposed North Park CPU have been designed to reflect and implement the CAP and the GHG reduction recommendations of the General Plan. Specifically, the proposed North Park CPU includes updated Land Use, Mobility, and Conservation elements that include multiple policies aimed at reducing GHG emissions from target emission sources and adapting to climate change. The proposed North Park CPU policies refine existing General Plan policies with site-specific recommendations applicable to the individual community. In several cases, these policies are also consistent with state key GHG reduction plans, regulations, and recommended mitigation measures.

The CAP establishes five primary strategies for achieving the goals of the plan. Strategy 1 (Energy & Water Efficient Buildings) includes goals, actions, and targets with the aim of reducing building energy consumption. The proposed North Park CPU includes policies in the Sustainability and Conservation Element for retrofitting public right-of-way lighting with energy-efficient lighting in support of sustainable infill and adaptive reuse with energy-efficient construction and through the Sustainable North Park Main Street (SNPMS) business district program promotion of exceedance of California building code energy-efficient measures for appliances, lighting, and new building design. The proposed North Park CPU also provides a toolbox with descriptions and illustrations of

construction techniques for consideration when planning or designing a project. Included as Appendix F, the Sustainability and Conservation Toolbox includes such energy efficiency development techniques as storefront shading, window film, green roofs, solar tubes and skylights, vent stacks, and cool roofs. These policies and tools further attain the CAP goals to reduce residential building energy consumption for both redevelopment (new construction) and existing development.

Another goal in Strategy 1 is to reduce daily per capita water consumption. The proposed North Park CPU includes discussion and policies to address water usage and conservation design opportunities for both public facilities and private development. In the Public Facilities, Services, and Safety Element, the proposed North Park CPU includes a policy to provide water recycling opportunities throughout the community. Similarly, in the Recreation Element, policies include the use of low-water plants in community parks and landscaped areas.

Within the Sustainability and Conservation Element, similar to energy efficiency, policies and tools are included to support reduced water usage in existing buildings and new construction. The proposed North Park CPU encourages new development and building retrofits to incorporate water-wise practices, including recycled or greywater systems, and landscape modifications to low-water or permeable surface materials when possible. As part of the toolbox, techniques for low-water usage include green roofs, greywater systems, and rainwater cisterns.

Regarding Strategy 2 (Clean & Renewable Energy), the proposed North Park CPU includes discussion and policies in the Sustainable Building Design Policies of the Urban Design Element and in the Sustainability and Conservation Element. The proposed North Park CPU encourages the use of passive or zero net energy strategies for new building design. Also, included in the Mobility Element, and the associated Mobility Toolbox, are policies and design considerations for electric vehicle charging stations in future infrastructure, near public parks, and in new residential, commercial, and mixed-use development.

Strategy 3 (Bicycling, Walking, Transit & Land Use) has a number of goals that relate to land use and planning. As discussed above, the proposed North Park CPU is consistent with the General Plan's Mobility Element and the City of Villages Strategy and is thus consistent with Action 3.1 of the CAP. Consistent with Action 3.2 of the CAP, the proposed North Park CPU and associated discretionary actions would promote pedestrian improvements in TPAs to increase commuter walking opportunities. Consistent with Action 3.6 of the CAP, the proposed North Park CPU and associated discretionary actions would implement transit-oriented development, particularly within and around the two Community Villages.

The primary goal of Strategy 4 (Zero Waste – Gas & Waste Management) is to divert solid waste and capture landfill methane gas emissions. This strategy is Citywide in nature; however, the proposed North Park CPU furthers this strategy by including discussion and policies in the Sustainability and Conservation Element that support waste reduction and recovery through composting. The Sustainability and Conservation Toolbox includes composting co-ops to provide a local zero waste opportunity for the community and recycling to reduce the waste being placed in landfills that should be implemented where applicable and feasible.

Strategy 5 (Climate Resiliency) calls for further analysis of the resiliency issues that face the various areas of the City. In the proposed North Park CPU, resiliency is addressed through many policies in the Sustainability and Conservation Element, in particular by supporting an increase in the tree canopy; the retention, addition, or replacement of street trees; and urban agriculture and the use of drought-tolerant plants in landscaping. Preservation, improvement, and expansion of the urban landscape are essential in creating a sustainable community. San Diego's tree canopy is a major infrastructural element and provides many added benefits to the pedestrian environment and the overall quality of life in urban areas – such as energy conservation and the minimization of heat gain. The movement towards urban agriculture or "farm-to-table" food production has been supported Citywide with ordinances encouraging the creation of community gardens, beekeeping, raising chickens and goats, and farmers markets and has allowed communities such as North Park to develop local agriculture economies and increase healthy and organic food access for the public. The CPU encourages the planting of native and/or drought–tolerant landscaping in medians, parkway strips, at public facilities, and as a replacement of private lawns; locating community gardens in North Park; encouraging the marketing and sales of local agricultural products to local residents, vendors, and restaurants through farmers markets and other direct farm-to-table sales; and ensuring that local development regulations allow for small-scale, compatible agricultural use of property, including edible landscaping, community gardens, and roadside food stands in appropriate areas of North Park. Also within the Sustainability and Conservation Element are policies supporting the conservation of natural resources and the protection of carbon sequestration resources.

As mentioned in Section 5.5, the CAP's Monitoring and Reporting Program Measure 1.4 calls for City Staff to annually evaluate City policies, plans (including the CAP), and codes as needed to ensure the CAP reduction targets are met. Through monitoring the effectiveness of CAP actions at reducing GHG emissions, the City would be able to make adjustments to the CAP, which could include amending land use plans to reflect more aggressive strategies for GHG reduction. Therefore, the proposed North Park CPU would be consistent with and would implement the CAP.

Cumulative Impacts

The impact analysis discussed under Issue 1 above is a cumulative analysis by its nature because GHG emissions are a cumulative issue caused by the global greenhouse gas emissions and not an individual project. Cumulatively, there exists a significant impact related to GHG emissions at the global level. However, as discussed under Issue 1 above, the project's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable. As discussed under Issue 2, City policies, plans, and codes will be evaluated as needed to ensure that CAP GHG emissions reduction targets are met. If implementation of the North Park CPU cumulatively with other CPUs would be inconsistent with the CAP or other plans/policies for the reduction of GHG, the City could amend land use plans to reflect more aggressive strategies for GHG reduction. Thus, cumulative impacts related to conflicts with GHG plans and policies would be less than significant.

6.5.4 Significance of Impacts

The proposed North Park CPU and associated discretionary actions would increase GHG emissions over those of the adopted Community Plan; however, this increase in GHG is a direct result of the

implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be less than significant.

The proposed North Park CPU and associated discretionary actions would implement the General Plan's City of Villages Strategy and include policies for the promotion of walkability and bicycle use, polices promoting transit-supportive development, and thus, would be consistent with the CAP and the General Plan. Impacts would be less than significant.

6.5.5 Mitigation Measures

All impacts related to GHG emissions would be less than significant. Thus, no mitigation is required.

6.6 Noise

This section addresses the potential noise impacts that would result from implementation of the proposed North Park Community Plan Update (CPU) and associated discretionary action. It also discusses the regulations applicable to subsequent projects contemplated by the proposed North Park CPU and associated discretionary action and the existing noise setting within the study area. This section is based on the Noise Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates (Noise Report) prepared by RECON (2015) for the project (Appendix F).

6.6.1 Existing Conditions

The existing regional environmental setting and regulatory framework related to noise is summarized in Chapters 2.0 and 5.0, respectively. The specific noise conditions for the North Park CPU area are discussed in the following sections.

6.6.1.1 Noise Measurements

As part of the noise assessment, ambient noise levels were measured in the planning area to provide a characterization of the variability of noise throughout the North Park CPU area and to assist in determining constraints and opportunities for future development. Ambient noise levels were measured to characterize the variability of noise and to assist in determining constraints and opportunities to avoid noise conflicts. Five 15-minute, daytime noise level measurements were conducted throughout the study area. Noise measurements were taken with two Larson-Davis LxT Type 1 Integrating Sound Level Meters, serial numbers 3827 and 3828. Each measurement location is shown in Figure 6.6-1. A summary of the measurements is provided in Table 6.6-1.

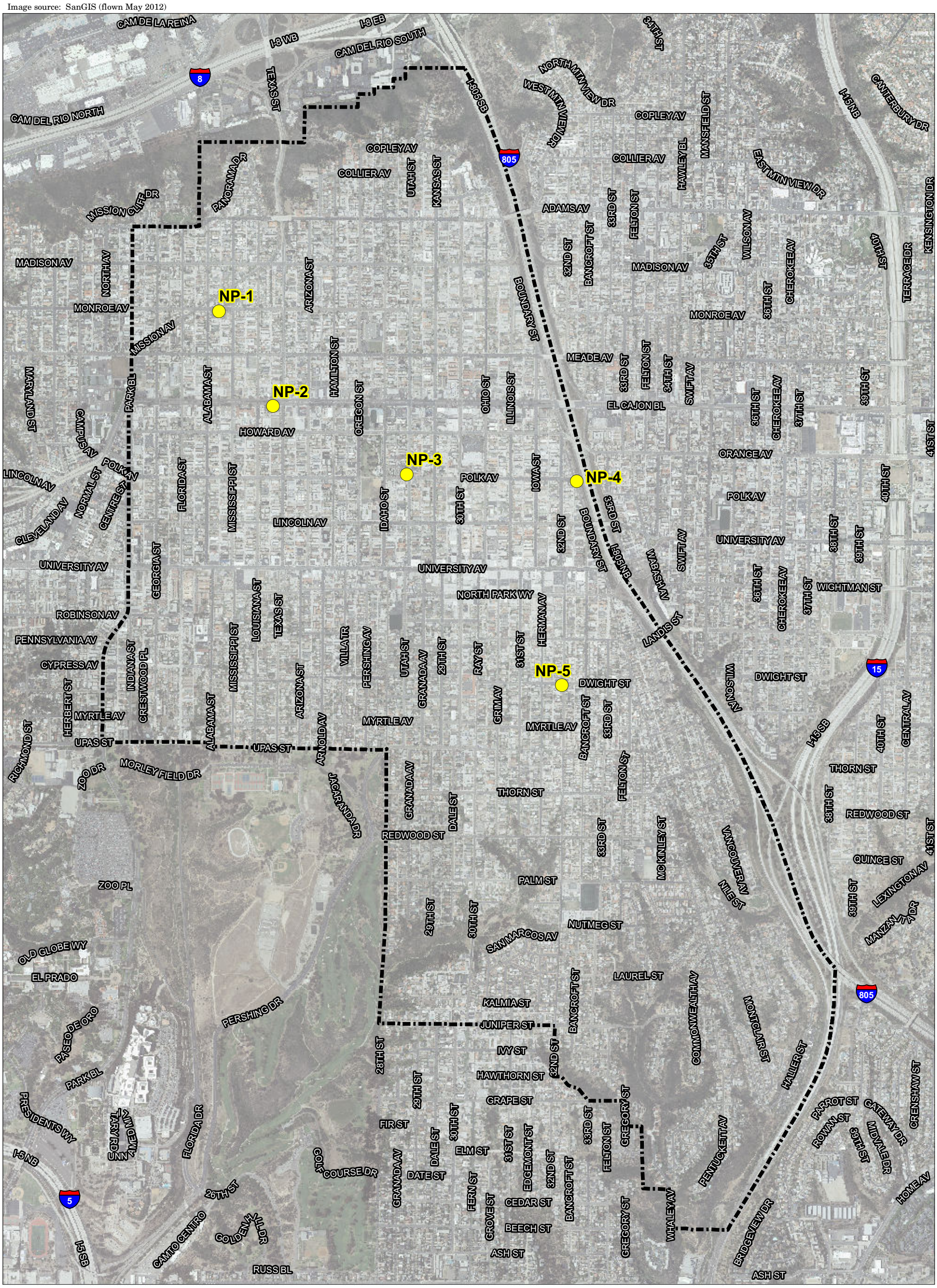
Based on the measurement data shown in Table 6.6-1, daytime noise levels in the North Park CPU area are typical of an urban environment. Each measurement location and noise source observed during the measurements is discussed below.

Table 6.6-1
Noise Measurements – North Park

ID[1]	Location	Date	Time	Leq
NP-1	Monroe Avenue	3/03/2015	3:29 P.M. – 3:44 P.M.	60.8
NP-2	El Cajon Boulevard	3/03/2015	4:00 P.M. – 4:15 P.M.	65.6
NP-3	Utah Street	3/03/2015	4:35 P.M. – 4:50 P.M.	64.0
NP-4	Interstate 805	3/04/2015	8:46 A.M. – 9:01 A.M.	66.5
NP-5	32nd Street	3/04/2015	9:17 A.M. – 9:32 A.M.	61.4

[1]Measurement locations are shown in Figure 6.6-1 and are represented by the ID provided in the table above.

Image source: SanGIS (flown May 2012)



North Park Community Plan Boundary

Noise Measurements

FIGURE 6.6-1

Noise Measurement Locations – North Park

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Measurement NP-1 was taken adjacent to Monroe Avenue. The main source of noise at the measurement location was vehicle traffic on Monroe Avenue and Mission Avenue. The observed speed on this portion of Monroe Avenue was 20 mph. The average measured noise level was 60.8 A-weighted decibels average sound level [dB(A) L_{eq}].

Measurement NP-2 was taken adjacent to El Cajon Boulevard. The main source of noise at the measurement location was vehicle traffic on El Cajon Boulevard and Texas Street. The measured speed on this portion of El Cajon Boulevard was 35 mph. The average measured noise level was 66.6 dB(A) L_{eq}.

Measurement NP-3 was taken adjacent to Utah Street. The main source of noise at the measurement location was vehicle traffic on Utah Street and Polk Avenue. The measured speed on this portion of Utah Street was 25 mph. The average measured noise level was 64.0 dB(A) L_{eq}.

Measurement NP-4 was taken at the southeast corner of Polk Avenue and Boundary Street overlooking Interstate 805 (I-805). The main source of noise at the measurement location was vehicle traffic on I-805. The average measured noise level was 66.5 dB(A) L_{eq}.

Measurement NP-5 was taken adjacent to 32nd Street. The main source of noise at the measurement location was vehicle traffic on 32nd Street and Dwight Street. The measured speed on this portion of 32nd Street was 25 mph. The average measured noise level was 61.4 dB(A) L_{eq}.

6.6.1.2 Existing Vehicle Traffic Noise

The dominant noise source for the Community Plan area is vehicle traffic on roadways. Vehicle traffic noise is directly related to the traffic volume, speed, and mix of vehicles. Vehicles traveling on I-805 and State Route 15 (SR-15) freeways are the dominant noise sources affecting the North Park community. The streets where the greatest noise level is generated in the area are 30th Street, Texas Street, University Avenue, and El Cajon Boulevard. Figure 6.6-2 shows the existing vehicle traffic noise contours for the North Park CPU area. As shown, existing noise levels in the community exceed 60 dB(A) community noise equivalent level (CNEL). The noise contours represent the predicted noise level for each roadway without the attenuating effects of noise barriers, structures, topography, or dense vegetation. The noise contours should not be considered site-specific but rather guides to determine when detailed acoustic analysis should be undertaken.

Image source: SanGIS (flown May 2012)

North Park Community Plan Boundary

Existing Noise Contours

- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL

0 Feet 1,400

Proposed Land Use (Draft)

Residential

- Residential - Low : 5-9 Du/Ac
- Residential - Low Medium : 10-15 Du/Ac
- Residential - Medium : 16-29 Du/Ac
- Residential - Medium High : 30-44 Du/Ac *
- Residential - High : 45-54 Du/Ac
- Residential - Very High : 55-73 Du/Ac

Commercial, Employment, Retail, and Services

- Community Commercial : 0-29 Du/Ac
- Community Commercial : 0-44 Du/Ac
- Community Commercial : 0-54 Du/Ac
- Community Commercial : 0-73 Du/Ac**
- Community Commercial : 0-109 Du/Ac***
- Neighborhood Commercial : 0-29 Du/Ac
- Neighborhood Commercial : 0-73 Du/Ac

Park, Open Space, and Recreation

- Open Space
- Park

Institutional, and Public/Semi-Public Facilities

- Institution

FIGURE 6.6-2

Existing Traffic Noise Contours – North Park

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6.6.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. A significant impact related to noise would occur if the proposed CPU and associated discretionary actions would:

1) Result in or create a significant increase in the existing ambient noise levels;

2) Result in an exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan;

3) Result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP);

4) Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code; or

5) Result in the exposure of people to significant temporary construction noise.

Regarding compatibility with aircraft noise levels (Issue 3), the San Diego International Airport is located approximately two miles west of the North Park planning area and is entirely outside of the 60 dB(A) CNEL noise contour identified in the Airport Land Use Compatibility Plan. Thus, no impact would occur related to aircraft noise and this issue is not discussed further in this section.

6.6.2.1 Noise

Thresholds used to determine the significance of noise impacts are based on standards in the City General Plan Noise Element and the Noise Abatement and Control Ordinance (Section 59.5.0101 et seq. of Municipal Code) as described in the Regulatory Framework chapter, sections 5.6.2.1 and 5.6.2.2, respectively.

6.6.2.2 Vibration

While, the City has not established specific groundborne noise and vibration standards, publications of the Federal Transit Administration (FTA) and California Department of Transportation (Caltrans) provide guidance for the analysis of environmental impacts due to groundborne noise and vibration relating to transportation and construction projects. Based on Caltrans recommended standards, a significant vibration impact would occur where residences would be exposed to an exceedance of 0.2 inch per second peak particle velocity.

6.6.3 Methodology and Assumptions

6.6.3.1 Vehicle Traffic Noise

Existing freeway volumes and traffic mixes were obtained from Caltrans and San Diego Association of Governments (SANDAG) traffic and truck counts for the SR-15, I-805, and I-8. These traffic mixes, which are detailed in the Noise Analysis (Appendix F), were used for modeling existing and future freeway noise.

For streets in the North Park CPU area, a traffic mix of 96 percent cars, three percent medium trucks, and one percent heavy trucks was modeled. This is consistent with traffic counts taken during the existing noise measurements, and the same as Caltrans truck counts for most area freeways. Vehicle traffic parameters used in this analysis for each freeway and street segment are included in the attached Noise Report (see Appendix F).

The Federal Highway Administration (FHWA) Traffic Noise Model was used to calculate distances for freeway and street noise contours. The FHWA model takes into account traffic mix, speed, and volume; roadway gradient; relative distances between sources, barriers, and sensitive receptors; and shielding provided by intervening terrain or structures. For the proposed North Park CPU and associated discretionary actions, the analysis of the noise environment considered that the topography was flat with no intervening terrain between sensitive land uses and roadways. With this assumption, predicted noise levels are higher than would actually occur when future site-specific analysis is done. In actuality, buildings and other obstructions along the roadways would shield distant receivers from traffic noise. For example, I-8 and I-805 are at lower elevations than the streets and buildings in the North Park CPU area slopes adjacent to the freeways in addition to intervening structures would reduce the actual noise levels from what is depicted in Figure 6.6-2.

6.6.3.2 Stationary Noise

Stationary sources of noise include activities associated with a given land use. Plan implementation would create many instances of residential land uses located adjacent to or sharing a boundary with commercial and mixed-use land uses as well as recreational and institutional uses. Proposed land uses would introduce on-site stationary noise sources, including rooftop HVAC equipment; mechanical equipment; emergency electrical generators; parking lot activities; loading dock operations; and parks, schools, and recreation activities. Stationary noise is considered a “point source” and attenuates over distance at a rate of 6 dBA for each doubling of distance.

6.6.4 Impact Analysis

Issue 1 Ambient Noise

Would the proposed project result in or create a significant increase in the existing ambient noise level?

As discussed in Section 6.6.1.1, Noise Measurements, existing noise levels were measured in the planning area to identify ambient noise conditions (refer to Table 6.6-1).

Freeways generating the greatest noise level affecting the North Park CPU area are I-8, SR-15, I-805. The streets generating the greatest noise level within the North Park CPU area are 30th Street, El Cajon Boulevard, Texas Street, and University Avenue. Increases in traffic noise gradually degrade the ambient noise environment, especially with respect to sensitive receptors. Vehicular traffic on streets in the North Park CPU area would increase due to build-out of the CPU area. Table 6.6-2 summarizes the existing and build-out traffic noise levels along various roadway segments in the North Park CPU area. The increase of vehicle traffic on freeways would occur regardless of the proposed North Park CPU and associated discretionary actions due to regional growth. Roadway noise is measured in dB(A) CNEL at 50 feet from the roadway centerline.

Table 6.6-2
Increases in Ambient Noise for the North Park CPU Area

Roadway	From	To	Existing Noise Level[1]	2035 Noise Level[1]	Change in dB(A)
30th Street	Adams Avenue	Meade Avenue	61.4	63.6	2.2
	Meade Avenue	El Cajon Boulevard	63.8	65.0	1.2
	El Cajon Boulevard	Howard Avenue	64.4	64.7	0.3
	Howard Avenue	Lincoln Avenue	64.4	66.1	1.7
	Lincoln Avenue	University Avenue	64.4	65.1	0.7
	University Avenue	North Park Way	66.5	64.4	-2.1
	North Park Way	Upas Street	64.3	65.6	1.3
	Upas Street	Redwood Street	62.9	64.1	1.2
	Redwood Street	Juniper Street	63.4	64.2	0.8
32nd Street	Howard Avenue	Lincoln Avenue	56.1	59.8	3.7
	Lincoln Avenue	University Avenue	58.6	58.0	-0.6
	University Avenue	Myrtle Street	60.4	63.9	3.5
	Myrtle Street	Upas Street	61.8	62.4	0.6
	Upas Street	Redwood Street	60.6	60.5	-0.1
	Redwood Street	Juniper Street	56.9	57.5	0.6
Adams Avenue	Park Boulevard	Alabama Street	61.7	62.1	0.4
	Alabama Street	Texas Street	62.9	62.7	-0.2
	Texas Street	30th Street	63.7	64.8	1.1
	30th Street	West Mountain View Drive	66.4	66.3	-0.1
Boundary Street	University Avenue	North Park Way	64.4	65.4	1.0
	North Park Way	Upas Street	57.8	58.6	0.8
	Upas Street	Redwood Street	60.1	61.2	1.1
	Redwood Street	Commonwealth Avenue	58.9	59.3	0.4
Commonwealth Avenue	Boundary Street	Juniper Street	55.1	57.9	2.8
El Cajon Boulevard	Park Boulevard	Florida Street	68.9	70.3	1.4
	Florida Street	Texas Street	69.7	71.4	1.7
	Texas Street	Oregon Street	69.9	71.7	1.8
	Oregon Street	Utah Street	71.1	72.6	1.5
	Utah Street	30th Street	71.1	72.3	1.2
	30th Street	Illinois Street	71.9	73.2	1.3
	Illinois Street	32nd Street	72.6	74.0	1.4
Florida Street	El Cajon Boulevard	University Avenue	58.7	62.1	3.4
	University Avenue	Robinson Avenue	60.8	62.8	2.0
	Robinson Avenue	Upas Street	60.9	61.7	0.8
Florida Drive	Upas Street	Morley Field Drive	66.0	66.8	0.8
Howard Avenue	Park Boulevard	Florida Street	58.2	60.2	2.0
	Florida Street	Texas Street	58.9	59.3	0.4
	Texas Street	Utah Street	60.2	63.9	3.7
	Utah Street	30th Street	61.3	63.5	2.2
	30th Street	32nd Street	62.0	63.6	1.6

Table 6.6-2
Increases in Ambient Noise for the North Park CPU Area

Roadway	From	To	Existing Noise Level[1]	2035 Noise Level[1]	Change in dB(A)
Juniper Street	30th Street	32nd Street	59.0	61.3	2.3
	32nd Street	Commonwealth Avenue	57.9	59.8	1.9
Landis Street	Boundary Street	Nile Street	59.2	59.4	0.2
Lincoln Avenue	**Florida Street**	**Texas Street**	**53.4**	**59.7**	**6.3**
	Texas Street	Oregon Street	57.2	58.4	1.2
	Oregon Street	30th Street	61.5	63.7	2.2
	30th Street	32nd Street	62.4	64.6	2.2
	32nd Street	Boundary Street	62.3	64.9	2.6
Madison Avenue	Park Boulevard	Mission Avenue	61.3	62.5	1.2
	Mission Avenue	Texas Street	62.4	63.5	1.1
	Texas Street	Boundary Street	60.6	64.3	3.7
Meade Avenue	Park Boulevard	Texas Street	59.5	62.5	3.0
	Texas Street	30th Avenue	60.6	63.4	2.8
	30th Avenue	Illinois Avenue	62.7	64.0	1.3
	Illinois Avenue	32nd Street	62.8	64.1	1.3
Mission Avenue	Park Boulevard	Texas Street	55.1	59.1	4.0
Monroe Avenue	Park Boulevard	Mission Avenue	54.2	58.4	4.2
	Mission Avenue	**Texas Street**	**55.2**	**60.8**	**5.6**
	Texas Street	30th Street	56.7	61.0	4.3
Nile Street	Landis Street	Thorn Street	59.7	60.4	0.7
North Park Way	30th Street	32nd Street	61.7	62.7	1.0
	32nd Street	Boundary Street	61.7	63.6	1.9
Orange Avenue/ Howard Avenue	Iowa Street	I-805	61.1	62.5	1.4
Pentuckett Avenue	Juniper Street	Fir Street	56.9	57.0	0.1
Pershing Drive	Upas Street	Redwood Street	61.5	63.6	2.1
Redwood Street	28th Street	30th Street	61.2	62.0	0.8
	30th Street	32nd Street	60.3	60.1	-0.2
	32nd Street	Boundary Street	55.6	59.8	4.2
Robinson Avenue	Park Boulevard	Florida Street	61.1	62.7	1.6
Texas Street	Adams Avenue	Mission Avenue	71.7	73.3	1.6
	Mission Avenue	**El Cajon Boulevard**	**69.5**	**73.2**	**3.7**
	El Cajon Boulevard	Howard Avenue	63.6	64.9	1.3
	Howard Avenue	University Avenue	63.2	65.4	2.2
	University Avenue	Myrtle Avenue	59.2	61.0	1.8
	Myrtle Avenue	Upas Street	57.9	59.5	1.6
University Avenue	Park Boulevard	Florida Street	67.8	68.7	0.9
	Florida Street	Texas Street	68.3	68.1	-0.2
	Texas Street	Oregon Street	68.0	69.0	1.0
	Oregon Street	Utah Street	68.0	68.9	0.9
	Utah Street	30th Street	66.2	67.0	0.8
	30th Street	Illinois Street	66.6	67.4	0.8
	Illinois Street	32nd Street	67.5	67.4	0.1
	32nd Street	Boundary Street	67.5	68.5	1.0
Upas Street	Alabama Street	Texas Street	61.9	62.7	0.8
	Texas Street	Pershing Road	61.9	64.0	2.1
	Pershing Road	30th Street	63.2	65.5	2.3
	30th Street	32nd Street	59.8	61.2	1.4
	32nd Street	Boundary Street	57.5	57.7	0.2

Table 6.6-2
Increases in Ambient Noise for the North Park CPU Area

Roadway	From	To	Existing Noise Level[1]	2035 Noise Level[1]	Change in dB(A)
Utah Street	**Adams Avenue**	**Monroe Avenue**	**53.4**	**60.4**	**7.0**
	Monroe Avenue	Meade Avenue	57.9	60.6	2.7
	Meade Avenue	El Cajon Boulevard	57.9	60.6	2.7
	El Cajon Boulevard	Howard Avenue	61.3	63.0	1.7
	Howard Avenue	Lincoln Avenue	59.0	63.6	4.6
	Lincoln Avenue	University Avenue	59.6	61.7	2.1
	University Avenue	North Park Way	60.2	60.5	0.3
	North Park Way	**Upas Street**	**56.2**	**62.1**	**5.9**
Freeways					
I-8	Hotel Circle (W)	Hotel Circle (E)	85.3	86.2	0.9
	Hotel Circle (E)	SR-163	85.5	86.1	0.6
	SR-163	Mission Center Road	85.6	86.1	0.5
	Mission Center Road	Qualcomm Way	85.9	86.9	1.0
	Qualcomm Way	I-805	85.4	86.2	0.8
	I-805	SR-15	86.2	86.8	0.6
SR-15	I-805	SR-94	83.1	84.0	0.9
I-805	I-8	Adams Avenue	85.8	88.1	2.3
	Adams Avenue	El Cajon Boulevard	85.4	87.7	2.3
	El Cajon Boulevard	University Avenue	85.3	87.6	2.3
	University Avenue	SR-15	85.1	87.5	2.4

[1]Roadway noise is measured in dB(A) CNEL at 50 feet from the roadway centerline.
Bold = Increase in ambient noise levels would be potentially significant per the following criteria:
Where exterior noise levels currently exceed the compatibility guidelines, the increase in ambient noise would exceed 3 dB(A).
Where exterior noise levels are currently less than the compatibility guidelines and future noise levels would also be less than the compatibility guidelines, the increase in ambient noise would exceed 5 dB(A).
Where exterior noise levels that are currently at or very near the compatibility guidelines, the increase in ambient noise would exceed 5 dB(A) or would result in a future noise level that would be 3 dB(A) more than the compatibility guideline.

The following street segment in the North Park CPU area currently generates noise levels greater than 65 dB(A) CNEL, and future noise levels would increase by more than 3 dB(A):

- Texas Street from Mission Avenue to El Cajon Boulevard

The following street segments in the North Park CPU area currently generate noise levels lower than 65 dB(A) CNEL and would generate future noise levels lower than 65 dB(A) CNEL, but future noise levels would increase by more than 5 dB(A) over existing ambient noise levels:

- Lincoln Avenue from Florida Street to Texas Street
- Monroe Avenue from Mission Avenue to Texas Street
- Utah Street from Adams Avenue to Monroe Avenue
- Utah Street from North Park Way to Upas Street

a. Existing Noise Sensitive Land Uses

There are existing noise sensitive uses located adjacent to these street segments and there could be additional future noise sensitive uses located adjacent to the street segments under the proposed

North Park CPU. The increase in ambient noise levels adjacent to these segments of Texas Street, Lincoln Avenue, Monroe Avenue, and Utah Street would result in the exposure of existing sensitive receptors to a significant increase in ambient noise levels, and impacts would be significant. Possible noise-reduction measures would include retrofitting older residential structures with new window and door components with higher Sound Transmission Class (STC) ratings, which is a measure of how well a building wall, windows and door components attenuate exterior noise. Measures addressing exterior noise levels at outdoor usable areas would include installation of noise barriers. At the program level, it cannot be determined whether the existing structures contain adequate attenuation to reduce interior noise to the 45 dB(A) CNEL standard and exterior noise to the 65 dB(A) CNEL, nor what measures would be required to reduce noise to meet applicable standards. Because the significant noise impacts are to existing homes in an urbanized area, there is no feasible mitigation at the program level. Thus, impacts to existing residential structures and noise sensitive land uses due to the increase in ambient noise levels associated with build-out of the proposed North Park CPU and associated discretionary actions would remain significant and unavoidable.

Impact 6.6-1 The increase in ambient noise levels as a result of build-out of the North Park CPU and associated discretionary actions would be 3 dB or more along the road segments listed below, resulting in the exposure of existing sensitive receptors to noise levels in excess of the compatibility levels established in the General Plan Noise Element:

- Texas Street from Mission Avenue to El Cajon Boulevard
- Lincoln Avenue from Florida Street to Texas Street
- Monroe Avenue from Mission Avenue to Texas Street
- Utah Street from Adams Avenue to Monroe Avenue
- Utah Street from North Park Way to Upas Street

b. Future Noise Sensitive Land Uses

An existing regulatory ~~mitigation~~ framework and review process exists for new development in areas exposed to high levels of ambient noise. Policies in the proposed North Park CPU and General Plan related to decibel levels, procedures in the Municipal Code, and regulations (Title 24) would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. Site-specific noise analyses that demonstrate that the project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility guidelines of the City's General Plan would be required as part of the review process for discretionary projects, to the extent practicable. With implementation of these regulations and procedures~~this framework~~, noise impacts to new discretionary projects would be less than significant. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable. Interior noise impacts for all projects including ministerial projects would be less than significant because applicants must demonstrate compliance with the current interior noise standards (45 dB(A) CNEL) through submission and approval of a Title 24 Compliance Report.

Impact 6.6-2 Due to generation of noise levels in excess of the compatibility levels established in the General Plan Noise Element resulting from build-out of the proposed North Park CPU and associated discretionary actions, a significant impact would occur for future projects located along the roadway segments listed below that only require the approval of a ministerial permit:

- Texas Street from Mission Avenue to El Cajon Boulevard
- Lincoln Avenue from Florida Street to Texas Street
- Monroe Avenue from Mission Avenue to Texas Street
- Utah Street from Adams Avenue to Monroe Avenue
- Utah Street from North Park Way to Upas Street

For all other street segments in the North Park CPU area not included in the above lists, the increase in ambient noise would be less than significant. The proposed North Park CPU and associated discretionary actions would not significantly worsen the noise exposure (i.e., would not result in a noise increase less than 3 dB(A) in areas already exposed to noise levels in excess of compatibility guidelines, or a future noise increase less than 5 dB(A) in areas currently exposed to noise levels less than compatibility guidelines). Thus, with the exception of the segments listed above, impacts due to the increase in ambient noise would be less than significant.

Issue 2 Vehicular Noise

Would the proposed project cause exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?

A significant impact would occur if implementation of the proposed North Park CPU and associated discretionary actions would result in an exposure of people to current or future motor vehicle traffic noise levels that exceed guidelines established in the Noise Element of the General Plan. The General Plan noise and land use compatibility guidelines are presented in Table 5-3 City of San Diego Land Use – Noise Compatibility Guidelines and summarized below. Implementation of the proposed North Park CPU would include build out of single-family residential, multi-family residential, commercial, institutional, visitor accommodation, and park and open space land uses, which are compatible with the following noise levels.

- Single-family residential is compatible up to 60 dB(A) CNEL and conditionally compatible up to 65 dB(A) CNEL.

- Multi-family residential and mixed uses are compatible up to 60 CNEL and conditionally compatible up to 70 CNEL. Additionally, as stated in Section B of the City's Noise Element, although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected by motor vehicle traffic noise with existing residential uses. Any future residential use exposed to noise levels up to 75 dB(A) CNEL must include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and be located in an area where a Community Plan allows multi-family and mixed-use residential uses.

- Sales, commercial services, and office uses are compatible up to 65 dB(A) CNEL and conditionally compatible up to 75 dB(A) CNEL.
- Institutional uses are compatible up to 60 dB(A) CNEL and conditionally compatible up to 65 dB(A) CNEL.
- Visitor accommodations (hotel) uses are compatible up to 60 dB(A) CNEL and conditionally compatible up to 75 dB(A) CNEL.
- Neighborhood parks are compatible up to 70 dB(A) CNEL and conditionally compatible up to 75 dB(A) CNEL.

Vehicle traffic from adjacent freeways are the dominant noise sources affecting the CPU area. The freeways and streets generating the greatest noise level in the North Park CPU area are I-8, SR-15, I-805, 30th Street, El Cajon Boulevard, Texas Street, and University Avenue. The distances to the 60, 65, 70, and 75 dB(A) CNEL noise contours for freeways and major roadways in the North Park CPU area are shown in Table 6.6-4. Distances to the roadway noise contours are based on a hard, flat site with no intervening barriers or obstructions (worst-case analysis). Future noise contours for the North Park planning area are shown in Figure 6.6-3. It should also be noted that elevations of I-8 and I-805 undulate, and where elevations are lower than the surrounding land uses, noise levels would be less than those shown in Table 6.6-3 and illustrated in Figure 6.6-3.

Image source: SanGIS (flown May 2012)

North Park Community Plan Boundary

Future Noise Contours

- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL

0 Feet 1,400

Proposed Land Use (Draft)

Residential

- Residential - Low : 5-9 Du/Ac
- Residential - Low Medium : 10-15 Du/Ac
- Residential - Medium : 16-29 Du/Ac
- Residential - Medium High : 30-44 Du/Ac *
- Residential - High : 45-54 Du/Ac
- Residential - Very High : 55-73 Du/Ac

Commercial, Employment, Retail, and Services

- Community Commercial : 0-29 Du/Ac
- Community Commercial : 0-44 Du/Ac
- Community Commercial : 0-54 Du/Ac
- Community Commercial : 0-73 Du/Ac**
- Community Commercial : 0-109 Du/Ac***
- Neighborhood Commercial : 0-29 Du/Ac
- Neighborhood Commercial : 0-73 Du/Ac

Park, Open Space, and Recreation

- Open Space
- Park

Institutional, and Public/Semi-Public Facilities

- Institution

* Residential Density up to 73 DU/AC allowed via PDP
** Along Park Blvd. Residential Density up to 145 DU/AC allowed via PDP
***Along El Cajon Blvd. Residential Density up to 145 DU/AC allowed via PDP

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FIGURE 6.6-3

Future (2035) Traffic Noise Contours – North Park

Table 6.6-3
Future Vehicle Traffic Contour Distances for the North Park CPU Area

Roadway	From	To	Distance To (feet)[1]			
			75 dB(A) CNEL	70 dB(A) CNEL	65 dB(A) CNEL	60 dB(A) CNEL
30th Street	Adams Avenue	Meade Avenue	4	11	36	115
	Meade Avenue	El Cajon Boulevard	5	16	50	158
	El Cajon Boulevard	Howard Avenue	5	15	47	148
	Howard Avenue	Lincoln Avenue	6	20	64	204
	Lincoln Avenue	University Avenue	5	16	51	162
	University Avenue	North Park Way	4	14	44	138
	North Park Way	Upas Street	6	18	57	182
	Upas Street	Redwood Street	4	13	41	129
	Redwood Street	Juniper Street	4	13	42	132
32nd Street	Howard Avenue	Lincoln Avenue	2	5	15	48
	Lincoln Avenue	University Avenue	1	3	10	32
	University Avenue	Myrtle Street	4	12	39	123
	Myrtle Street	Upas Street	3	9	27	87
	Upas Street	Redwood Street	2	6	18	56
	Redwood Street	Juniper Street	1	3	9	28
Adams Avenue	Park Boulevard	Alabama Street	3	8	26	81
	Alabama Street	Texas Street	3	9	29	93
	Texas Street	30th Street	5	15	48	151
	30th Street	West Mountain View Drive	7	21	67	213
Boundary Street	University Avenue	North Park Way	5	17	55	173
	North Park Way	Upas Street	1	4	11	36
	Upas Street	Redwood Street	2	7	21	66
	Redwood Street	Commonwealth Avenue	1	4	13	43
Commonwealth Avenue	Boundary Street	Juniper Street	1	3	10	31
El Cajon Boulevard	Park Boulevard	Florida Street	17	54	169	536
	Florida Street	Texas Street	22	69	218	690
	Texas Street	Oregon Street	23	74	234	740
	Oregon Street	Utah Street	29	91	288	910
	Utah Street	30th Street	27	85	269	849
	30th Street	Illinois Street	33	104	330	1,045
	Illinois Street	32nd Street	40	126	397	1,256
Florida Street	El Cajon Boulevard	University Avenue	3	8	26	81
	University Avenue	Robinson Avenue	3	10	30	95
	Robinson Avenue	Upas Street	2	7	23	74
Florida Drive	Upas Street	Morley Field Drive	8	24	76	239
Howard Avenue	Park Boulevard	Florida Street	2	5	17	52
	Florida Street	Texas Street	1	4	13	43
	Texas Street	Utah Street	4	12	39	123
	Utah Street	30th Street	4	11	35	112
	30th Street	32nd Street	4	11	36	115
Juniper Street	30th Street	32nd Street	2	7	21	67
	32nd Street	Commonwealth Avenue	2	5	15	48
Landis Street	Boundary Street	Nile Street	1	4	14	44
Lincoln Avenue	Florida Street	Texas Street	1	5	15	47
	Texas Street	Oregon Street	1	3	11	35
	Oregon Street	30th Street	4	12	37	117
	30th Street	32nd Street	5	14	46	144
	32nd Street	Boundary Street	5	15	49	155

Table 6.6-3
Future Vehicle Traffic Contour Distances for the North Park CPU Area

Roadway	From	To	Distance To (feet)[1]			
			75 dB(A) CNEL	70 dB(A) CNEL	65 dB(A) CNEL	60 dB(A) CNEL
Madison Avenue	Park Boulevard	Mission Avenue	3	9	28	89
	Mission Avenue	Texas Street	4	11	35	112
	Texas Street	Boundary Street	4	13	43	135
Meade Avenue	Park Boulevard	Texas Street	3	9	28	89
	Texas Street	30th Avenue	3	11	35	109
	30th Avenue	Illinois Avenue	4	13	40	126
	Illinois Avenue	32nd Street	4	13	41	129
Mission Avenue	Park Boulevard	Texas Street	1	4	13	41
Monroe Avenue	Park Boulevard	Mission Avenue	1	3	11	35
	Mission Avenue	Texas Street	2	6	19	60
	Texas Street	30th Street	2	6	20	63
Nile Street	Landis Street	Thorn Street	2	5	17	55
North Park Way	30th Street	32nd Street	3	9	29	93
	32nd Street	Boundary Street	4	11	36	115
Orange Avenue/Howard Avenue	Iowa Street	I-805	3	9	28	89
Pentuckett Avenue	Juniper Street	Fir Street	1	3	8	25
Pershing Drive	Upas Street	Redwood Street	4	11	36	115
Redwood Street	28th Street	30th Street	3	8	25	79
	30th Street	32nd Street	2	5	16	51
	32nd Street	Boundary Street	2	5	15	48
Robinson Avenue	Park Boulevard	Florida Street	3	9	29	93
Texas Street	Adams Avenue	Mission Avenue	34	107	338	1,069
	Mission Avenue	El Cajon Boulevard	33	104	330	1,045
	El Cajon Boulevard	Howard Avenue	5	15	49	397
	Howard Avenue	University Avenue	5	17	55	173
	University Avenue	Myrtle Avenue	2	6	20	63
	Myrtle Avenue	Upas Street	1	4	14	45
University Avenue	Park Boulevard	Florida Street	12	37	117	371
	Florida Street	Texas Street	10	32	102	323
	Texas Street	Oregon Street	13	40	126	397
	Oregon Street	Utah Street	12	39	123	388
	Utah Street	30th Street	8	25	79	251
	30th Street	Illinois Street	9	27	87	275
	Illinois Street	32nd Street	9	27	87	275
	32nd Street	Boundary Street	11	35	112	354
Upas Street	Alabama Street	Texas Street	3	9	29	93
	Texas Street	Pershing Road	4	13	40	126
	Pershing Road	30th Street	6	18	56	177
	30th Street	32nd Street	2	7	21	66
	32nd Street	Boundary Street	1	3	9	29
Utah Street	Adams Avenue	Monroe Avenue	2	5	17	55
	Monroe Avenue	Meade Avenue	2	6	18	57
	Meade Avenue	El Cajon Boulevard	2	6	18	57
	El Cajon Boulevard	Howard Avenue	3	10	32	100
	Howard Avenue	Lincoln Avenue	4	11	36	115
	Lincoln Avenue	University Avenue	2	7	23	74
	University Avenue	North Park Way	2	6	18	56
	North Park Way	Upas Street	3	8	26	81

Table 6.6-3
Future Vehicle Traffic Contour Distances for the North Park CPU Area

Roadway	From	To	Distance To (feet)[1] 75 dB(A) CNEL	70 dB(A) CNEL	65 dB(A) CNEL	60 dB(A) CNEL
Freeways						
I-8	Hotel Circle (W)	Hotel Circle (E)	279	601	1,295	2,790
	Hotel Circle (E)	SR-163	275	592	1,275	2,748
	SR-163	Mission Center Road	275	592	1,275	2,748
	Mission Center Road	Qualcomm Way	311	669	1,442	3,107
	Qualcomm Way	I-805	279	601	1,295	2,790
	I-805	SR-15	306	659	1,420	3,059
SR-15	I-805	SR-94	199	429	924	1,991
I-805	I-8	Adams Avenue	374	805	1,734	3,735
	Adams Avenue	El Cajon Boulevard	351	757	1,630	3,513
	El Cajon Boulevard	University Avenue	346	745	1,606	3,459
	University Avenue	SR-15	341	734	1,581	3,406

[1]Roadway noise is measured from the roadway centerline.

While the General Plan Noise Element has a compatibility level of 60 dB(A) CNEL or less for residential uses, noise levels up to 65 dB(A) CNEL for single-family residential and up to 70 dB(A) CNEL for multi-family residential are considered conditionally compatible because interior noise levels can be reduced to 45 dB(A) CNEL through simple means, such as closing/sealing windows and providing mechanical ventilation. Additionally, as stated in Section B of the General Plan Noise Element, although not generally considered compatible, the General Plan conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected by motor vehicle traffic noise with existing residential uses.

Any future residential use exposed to noise levels up to 75 dB(A) CNEL must include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and be located in an area where a Community Plan allows multi-family and mixed-use residential uses. Passive mitigation such as noise walls can usually reduce exterior noise levels to comply with the General Plan Noise Element guidelines. The majority of proposed North Park CPU residential land uses would be located within the conditionally compatible range. Multi-family residential uses located where exterior noise levels range from 65 to 70 dB(A) CNEL are considered conditionally compatible and can generally provide the required structural attenuation to reduce noise levels at interior locations. Multi-family and mixed-use residential uses that meet the requirements of Section B of the General Plan Noise Element would be conditionally compatible up to 75 dB(A) CNEL and would also be required to provide structural attenuation to reduce noise levels at interior locations.

Additionally, due to the provision of common exterior use areas, multi-family residential land uses can generally provide greater shielding to these areas, thus providing exterior use areas that comply with the General Plan Noise Element guidelines. Likewise, backyards of single-family residential uses can be shielded from roadway noise by the residential structure, providing exterior use areas that are compatible with the General Plan Noise Element guidelines.

As shown in Figure 6.6-3, traffic noise levels at existing and proposed residential use areas closest to the freeways and heavily traveled roadways would exceed the General Plan Noise Element

conditionally compatible thresholds for residential land uses (65 dB(A) CNEL for single-family and conditionally up to 75 dB(A) CNEL for multi-family and mixed-use developments that meet the requirements of Section B of the Noise Element). Noise levels greater than 75 dB(A) CNEL are considered incompatible for all land use types. Uses located adjacent to SR-15, and I-805 in the North Park CPU area have the potential to be exposed to noise levels greater than 75 dB(A) CNEL. However, the proposed North Park CPU and associated discretionary actions would not locate new sensitive land uses in areas that are exposed to 75 dB(A) CNEL or greater. Additionally, as noted previously, elevations of I-8 and I-805 are lower than the plan area structures and streets, and noise levels would be less than those shown in Table 6.6-3 and Figure 6.6-3, which is a worst-case scenario.

In the North Park CPU area, noise levels for all land uses would be incompatible (i.e., greater than 75 dB(A) CNEL) at areas located approximately 199 feet from SR-15, and 341 to 374 feet from I-805. Noise levels for sensitive land uses would be incompatible (i.e., greater than 70 CNEL) at areas located approximately 429 feet from SR-15, and 734 to 805 feet from I-805. While these areas are largely developed and the proposed North Park CPU and associated discretionary actions would not change the land use, build out could introduce new sensitive land uses in these areas. However, the General Plan Noise Element requires that any future multi-family and mixed-use residential use exposed to noise levels up to 75 dB(A) CNEL must include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and be located in an area where a Community Plan allows multi-family and mixed-use residential uses.

Policies in the proposed North Park CPU and General Plan would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. General Plan policy NE-A.4 requires an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines.

Site-specific exterior noise analyses would be required as part of future discretionary proposals. These analyses would need to demonstrate that the project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility guidelines of the General Plan. Additionally, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility guidelines of the General Plan would be required for all discretionary and ministerial land uses located in areas where exterior noise levels exceed the noise and land use compatibility thresholds as defined in the General Plan Noise Element, Table N-3. This requirement is implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 dB(A) CNEL). With this framework, exterior traffic noise impacts associated with new development requiring discretionary approvals and interior traffic noise impacts for both ministerial and discretionary projects would be less than significant.

However, in the case of exterior noise impacts associated with ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unmitigated.

Impact 6.6-3 A significant impact would occur for ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours as shown on Figure 6.6-3 of this PEIR.

Issue 4 Noise Ordinance Compliance

Would the proposed project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?

A significant impact would occur if implementation of the proposed North Park CPU and associated discretionary actions resulted in the exposure of people to noise levels that exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code as detailed in Section 5.6.2.2 of Chapter 5, Regulatory Framework. Stationary sources of noise include activities associated with a given land use. For example, noise sources associated with commercial uses would include: car washes, fast food restaurants with drive-ins and drive-thrus, auto repair facilities, parking lots, and a variety of other uses. Additionally, due to the number of eating and drinking establishments with outdoor areas and open windows in close proximity to existing residential areas, North Park experiences elevated noise levels associated with these uses.

Mixed-use areas and areas where residential uses are located in proximity to commercial sites would result in an exposure of sensitive receptors to noise. The interface between commercial and residential uses would be exposed to noise due to traffic, loading docks, mechanical equipment [such as generators and heating, ventilation, and air conditioning (HVAC) units], deliveries, trash-hauling activities, and customer and employee use of commercial facilities. Limiting truck idling time and enclosing external equipment (generators, HVAC units, etc.) that are adjacent to residential uses would reduce stationary noise levels.

Although noise-sensitive residential land uses would be exposed to noise associated with the operation of commercial uses, policies in place are intended to control noise and reduce noise impacts between various land uses. The noise policies contained in the General Plan and Noise Ordinance are in place to control noise and reduce noise impacts between various land uses. These include the requirement for noise studies, limits on hours of operation for various noise-generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. In addition, enforcement of the federal, State, and local noise regulations would control impacts.

Moreover, the proposed North Park CPU includes policies to reduce noise impacts. Such policies include requiring acoustical studies for eating and drinking establishments, promoting “quiet-in-residential neighborhoods” signs to bring awareness to evening commercial patrons who walk through residential neighborhoods, incorporating sound-attenuation measures for commercial fast food ‘drive-thru’ properties, and encouraging truck deliveries on commercial streets. These criteria would be applied as future development is proposed to implement the proposed North Park CPU. Given implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts would be less than significant.

Issue 5 Temporary Construction Noise

Would the proposed project result in the exposure of people to significant temporary construction noise?

a. Construction Noise

A significant impact would occur if implementation of the proposed North Park CPU and associated discretionary actions resulted in the exposure of people to significant temporary construction noise. Future development as allowed under the proposed North Park CPU and associated discretionary actions could potentially result in temporary ambient noise increase due to construction activities.

No specific construction or development is proposed under the North Park CPU at this time, but impacts could occur when future development under the proposed North Park CPU and associated discretionary actions is proposed. Future development as allowed under the proposed North Park CPU and associated discretionary actions could potentially result in temporary ambient noise increases due to construction activities. Construction noise would be generated by diesel-powered construction equipment used for site preparation and grading, removal of existing structures and pavement, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove the spoils from excavation.

Due to the developed nature of the North Park CPU area, there is a high likelihood that construction activities would take place adjacent to existing structures. Construction activities may include demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last weeks to months and may produce substantial vibration. Excavation for underground levels could also occur on some project sites, and vibratory pile driving could be used to stabilize the walls of excavated areas. Piles or drilled caissons may also be used to support building foundations.

Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition/land clearing, grading and excavation, erection). Construction noise in any one particular area would be short-term and would include noise from activities such as site preparation, truck hauling of material, pouring of concrete, and use of power tools. Noise would also be generated by construction equipment, including earthmovers, material handlers, and portable generators, and could reach high levels for brief periods. Typical construction noise levels are discussed in Appendix F.

The exact location of construction activities is not known at this time. However, due to the highly developed nature of the North Park CPU area, it is likely that sensitive receptors would be located in proximity to future construction activities. The City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance. In addition, the Noise and Light Element of the proposed North Park CPU includes a policy that would require implementation of noise controls such as limits on construction activity hours and acoustical shielding to reduce construction noise levels emanating from new construction.

For purposes of evaluating the typical noise levels that would be generated from a construction site, typical noise levels and assumptions can be used. Construction equipment on a typical construction

site would generate maximum noise levels between 85 and 90 dB at 50 feet from the source when in operation. Hourly average noise levels would be 82 dB(A) at 50 feet from the center of construction activity considering the loudest pieces of equipment working simultaneously. Noise levels would vary depending on the nature of the construction including the duration of specific activities, nature of the equipment involved, location of the particular receiver, and nature of intervening barriers. Construction noise levels of 82 dB(A) Leq at 50 feet would attenuate to 75 dB(A) L_{eq} at 110 feet. Therefore, based on this analysis of typical construction noise levels, significant impacts would occur if noise sensitive land uses are located closer than 110 feet from construction activities.

Impact 6.6-4 A significant impact would occur if sensitive land uses are located within 110 feet of future construction activities.

While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the North Park CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land uses to significant noise levels (Impact 6.6-4).

b. Vibration - Construction

Construction of projects implemented under the proposed North Park CPU and associated discretionary actions would likely be located adjacent to existing structures. Construction activities may include demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last several weeks to months and may produce substantial vibration. Excavation for underground levels could also occur on some project sites, and vibratory pile driving could be used to stabilize the walls of excavated areas. Piles or drilled caissons may also be used to support building foundations.

As with any type of construction, vibration levels during any phase may at times be perceptible. However, non-pile driving or foundation work construction phases that have the highest potential of producing vibration (such as jackhammering and other high power tools) would be intermittent and would only occur for short periods of time for any individual project site. By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum.

Construction pile driving has the potential to generate the highest groundborne vibration levels and is the primary concern for structural damage when it occurs within 100 feet of structures. Vibration levels generated by pile driving activities would vary depending on project conditions, such as soil conditions, construction methods, and equipment used. Pile driving activities generate vibrations at various frequencies, with the dominant frequency of propagating waves from impact sources ranging between 3 and 60 Hz. Using the middle range for illustration purposes, equipment operating at a frequency range of 30 Hz would exceed the perceptible range at approximately 100

feet. Pile driving within 95 feet of existing structures has the potential to exceed the 0.20 inch per second PPV threshold. Thus, implementation of future land uses under the proposed North Park CPU would have the potential to result in a significant impact related to construction related vibration.

Impact 6.6-5 If future pile driving occurs within 95 feet of existing structures, a potentially significant impact would result.

c. Vibration – Operation

Commercial operations, on occasion, utilize equipment or processes that have a potential to generate groundborne vibration. However, vibrations found to be excessive for human exposure that are the result of commercial machinery are generally addressed from an occupational health and safety perspective. The residual vibrations are typically of such low amplitude that they quickly dissipate into the surrounding soil and are rarely perceivable at the surrounding land uses. Additionally commercial uses that may be constructed under the proposed North Park CPU and associated discretionary actions would include uses such as retail, restaurants, and small offices that would not require heavy truck deliveries or heavy mechanical equipment during operation that would generate groundborne vibration. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the proposed North Park CPU and associated discretionary actions implementation would be less than significant.

Cumulative Impacts

The analysis provided above for each issue area is cumulative in nature because the analysis considers noise and vibration impacts associated with build-out of the entirety of the North Park CPU area and the traffic assumptions used in the analysis includes cumulative traffic associated with build-out of neighboring communities. Noise impacts associated with build out of neighboring CPUs such as the Golden Hill and Uptown would be localized in nature. For example, construction of restaurants or commercial uses in Uptown or Golden Hill, would not affect residences in North Park with the exception of development that may occur at the boundary of the CPU areas. However, build out of land uses within each CPU area would be subject to the same General Plan policies, noise ordinance requirements, and Title 24 standards discussed in this document. Thus, cumulative noise impacts would be less than significant.

6.6.5 Significance of Impacts

Issue 1 Ambient Noise

An increase in ambient vehicular traffic noise in the North Park CPU area would result from continued build-out of the proposed North Park CPU and increases in traffic due to regional growth. A significant increase would occur adjacent to several street segments in the North Park CPU area. The increase in ambient noise levels could result in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan. Thus, impacts to existing noise sensitive land uses would be significant (Impact 6.6-1).

For new discretionary development, there is an existing regulatory framework in place that would ensure future projects implemented in accordance with the proposed North Park CPU and associated discretionary actions would not be exposed to ambient noise levels in excess of the compatibility levels in the General Plan. Thus, noise impacts to new discretionary projects would be less than significant.

However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 6.6-2).

Issue 2 Vehicular Noise

In the North Park CPU area, noise levels for all land uses would be incompatible (i.e., greater than 75 dB(A) CNEL) closest to the freeways. These areas are currently developed and the proposed North Park CPU and associated discretionary actions would not change the land use in these area. Thus, while land uses in these areas would be exposed to noise levels that exceed General Plan standards, this noise exposure would not be a significant noise impact resulting from implementation of the proposed North Park CPU and associated discretionary actions. No mitigation is required at the program level.

An ~~mitigation~~existing regulatory framework and review process exists for new discretionary development in areas exposed to high levels of vehicle traffic noise. Individual projects would be required to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with the proposed North Park CPU and associated discretionary actions would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 6.6-3).

Issue 4 Noise Ordinance Compliance

Mixed-use areas would contain residential and commercial interfaces. Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise. Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial uses, City policies and regulations would control noise and reduce noise impacts between various land uses. In addition, enforcement of the federal, state, and local noise regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts would be less than significant and no mitigation is required at the program level.

Issue 5 Temporary Construction Noise

a. Construction Noise

Construction activities related to implementation of the proposed North Park CPU and associated discretionary actions would potentially generate short- term noise levels in excess of 75 dB(A) L_{eq} at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the North Park CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land use to significant noise levels. While future development projects will be required to incorporate feasible mitigation measures, due to the close proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise would ~~remain~~ be potentially significant ~~and unavoidable~~ (Impact 6.6~~.~~-4).

b. Vibration – Construction

By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and as such would result in a less than significant impact with respect to perception. However, pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second, and would be potentially significant (Impact 6.6-5).

c. Vibration – Operation

Post-construction operational vibration impacts could occur as a result of future commercial operations that are implemented in accordance with the proposed North Park CPU and associated discretionary actions.

The commercial uses that would be constructed under the proposed North Park CPU and associated discretionary actions would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the proposed North Park CPU implementation and associated discretionary actions would be less than significant. No mitigation is required.

6.6.6 Mitigation Framework

Increases in ambient noise levels resulting in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan Noise Element, would be significant and unavoidable (Impact 6.6-1). No feasible mitigation has been identified at the program level to reduce this impact to less than significant.

New noise sensitive land uses that require only a ministerial permit would be subject to significant and unavoidable exterior traffic noise impacts resulting from increases in ambient noise levels generated from build-out of the proposed North Park CPU (Impact 6.6-2). Additionally, significant and unavoidable impacts would occur for future ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours (Impact 6.6-3). These impacts would be significant and unavoidable. No feasible mitigation has been identified at the program level to reduce these impacts to less than significant as there is no mechanism to require exterior noise analysis and attenuation for these ministerial projects.

In order to mitigate impacts related to construction noise (Impact 6.6-4), the following mitigation measure would be implemented.

NOISE 6.6-1 At the project level, future discretionary development projects will be required to incorporate feasible mitigation measures. Typically, noise can be reduced to comply with City standards when standard construction noise control measures are enforced at the project site and when the duration of the noise-generating construction period is limited to one construction season (typically one year) or less.

- Construction activities shall be limited to the hours between 7:00 A.M. and 7:00 P.M. Construction is not allowed 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. (Consistent with Section 59.5.0404 of the San Diego Municipal Code).
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers.
- Acoustically shield stationary equipment located near residential receivers with temporary noise barriers.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.

In order to mitigate impacts relative to vibration during construction (Impact 6.6-5), the following mitigation measure would be implemented.

NOISE 6.6-2 For discretionary projects where construction would include vibration-generating activities, such as pile driving, within 95 feet of existing structures, site-specific vibration studies shall be conducted to ensure the development project would not adversely affect adjacent properties to the satisfaction of the Chief Building Official. Such efforts shall be conducted by a qualified structural engineer and could include:

~~site-specific vibration studies shall be conducted to determine the area of impact and to present appropriate mitigation measures that may include the following:~~

- Identify sites that would include vibration compaction activities such as pile driving and have the potential to generate groundborne vibration and the sensitivity of nearby structures to groundborne vibration. ~~This task shall be conducted by a qualified structural engineer.~~

- Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approach the limits.

- ~~At a minimum, m~~Monitor vibration during initial demolition activities and during pile-driving activities. Monitoring results may indicate the need for more or less intensive measurements.

- When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures.

- Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

6.6.7 Significance of Impacts after Mitigation

Impacts to existing noise sensitive land uses due to the increase in ambient noise levels associated with build-out of the proposed North Park CPU and associated discretionary actions would remain significant and unavoidable (Impact 6.6-1). No feasible mitigation measures have been identified to address this impact because there is no mechanism or funded program in place to provide noise attenuation at existing structures that would be exposed to ambient noise increases.

There are no feasible mitigation measures to reduce the impact of ambient noise level increases associated with future ministerial development within the North Park CPU area (Impact 6.6-2); thus, ambient noise impacts associated with future ministerial projects would remain significant and unavoidable. Similarly, impacts associated with future ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours would be significant and unavoidable (Impact 6.6-3).

Regarding temporary construction noise impacts (Impact 6.6-4), future construction projects would be required to incorporate the standard controls outlined in NOISE 6.6-1, which would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With the implementation of these controls, and the limited duration of the noise-generating construction period, the substantial temporary increase in ambient noise levels would be less than significant.

Regarding vibration impacts during construction (Impact 6.6-5), pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second, resulting in a potentially significant impact. Implementation of mitigation measure NOISE 6.6-2 would reduce construction-related vibration impacts; however, at the program-level it cannot be known whether the measures would be adequate to minimize vibration levels to less than significant. Thus, even with implementation of NOISE 6.6-2, construction related vibration impacts would be significant and unavoidable.

6.7 Historical Resources

This section analyzes the potential impacts on historical resources due to implementation of the proposed North Park Community Plan Update (CPU) and associated discretionary actions. It documents the historical background for the North Park community and addresses prehistoric, historic, archaeological, and sacred lands. The information in this section is based on the *Community Plan Update for the Community of Greater North Park Prehistoric Cultural Resources Study* (AECOM, January 2015), the *North Park Community Plan Area Historic Resources Survey* (Historic Resources Group, May 2016), and other primary and secondary sources as referenced in the reports and this section. These reports are included in Appendixes G-1 and G-2, respectively, of this PEIR.

6.7.1 Existing Conditions

A general discussion of the environmental setting relative to historical resources and the applicable regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. The existing conditions included in this chapter focuses on the North Park community (formerly known as Greater North Park) and the specific cultural resources identified or known to occur in this community.

Historical resources (also referred to as cultural resources) are physical features, both natural and constructed, which reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of archaeological sites, tribal cultural resources, and the built environment resources that are determined to be significant under California Environmental Quality Act (CEQA).

The North Park Community Plan Area is one of the older communities in San Diego. Located north and east of Balboa Park, the CPU area is composed of several communities, including the original North Park neighborhood, and portions of University Heights and Valle Vista, among others. North Park is located on a mesa punctuated by hills and numerous canyons. The sloping sides of the mesa define the north, east, and south boundaries of North Park. The Uptown Community Plan area and Balboa Park further define the western boundary.

The North Park community is primarily residential, with commercial centers located along major transportation corridors. Major east-west corridors include Upas Street, University Avenue, and El Cajon Boulevard; north-south corridors include Park Boulevard and 30th Street. While large portions of North Park were first subdivided in the late-19th century, much of the development did not occur until the 1920s and 1930s. During this period, large tracts were built out with single-family

residences designed in the popular architectural styles of the day, including the Craftsman and Spanish Colonial Revival styles. Multi-family residences were developed primarily as infill in established neighborhoods, and include residential courts from the 1920s through the 1950s, along with larger apartment buildings from the 1960s and 1970s.

North Park was first connected to the City center by the electric streetcar in 1890. This mode of transportation, in combination with the city's substantial growth and installation of supporting utilities within the community, prompted subdivision of land in this community in the late 19th century and development in the early 20th century. Commercial development was also clustered along transportation lines, first along streetcar routes, such as Park Boulevard and University Avenue, and later along automobile corridors like El Cajon Boulevard. As a result, North Park's commercial development reflects a wide range of architectural styles, including Art Deco, Egyptian Revival, Streamline Moderne, Spanish Colonial Revival, and Mid-Century Modern.

6.7.1.1 North Park Prehistory

The prehistoric cultural sequence in San Diego County is generally thought of as three basic periods: the Paleoindian, locally characterized by the San Dieguito complex; the Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and the Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay. The Ethnohistoric period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in San Diego and the founding of Mission San Diego de Alcalá in 1769 brought profound changes in the lives of the Kumeyaay and continued through the Spanish (1769-1821) and Mexican (1821-1848) periods and into the American period (1848-present). These cultural sequences are further described in Chapter 2.0 – Environmental Setting.

6.7.1.2 North Park History

The history of North Park can be generally characterized into four themes significant to the development of the community: Early Settlement of Greater North Park: 1893 to 1906; Development of North Park: 1907 to 1929; Influence of the Great Depression and World War II in North Park: 1930 to1945; and Post-World War II Development in North Park: 1946 to 1970. These patterns of cultural and historical development are summarized below.

Early Settlement of Greater North Park: 1893 to 1906

North Park initially developed as an agricultural community. In 1893, James Monroe Hartley purchased forty acres on what was then the northeastern edge of the city. He named the area Hartley's North Park, due to its location relative to City Park (Balboa Park), and planted a lemon orchard. Over the next decade, several other families established residences and citrus ranches in North Park. By 1900, there were seven land owners and fifty-five residents between Florida Canyon and the eastern City limits at Boundary Street. However, by 1905 most of the groves had been decimated by drought. This, combined with ongoing infrastructure improvements, paved the way for the subdivision of these agricultural lands for residential development.

Development of North Park: 1907 to 1929

The expansion of the city's streetcar system into North Park – including the Adams Avenue Line (1907), University Avenue Line (1907), and 30th Street Line (1911) – had a tremendous impact on the development of North Park. Early real estate subdivisions closely followed the routes of the streetcar lines. As San Diego's population reached 75,000 by 1920, most new development occurred in areas east of downtown. By 1924, North Park was considered the fastest growing neighborhood in San Diego.

In the 1920s, as developers installed the infrastructure, mostly middle-class families erected the modest residences that make up much of North Park's residential building stock today. During this period, architectural preferences shifted away from Victorian styles to the Craftsman style, whose deep eaves and large porches were well-suited to San Diego's mild climate. During this same period, bungalow courts proliferated throughout North Park, primarily in the area between University and Adams Avenues.

One of North Park's earliest commercial nodes, at the intersection of 30th Street and University Avenue streetcar lines, would develop into the community's primary business district. As automobile ownership increased, commercial centers began to move away from the streetcar routes. In North Park, commercial development shifted to El Cajon Avenue (now El Cajon Boulevard). Unlike University Avenue, which was developed for the pedestrian, businesses on El Cajon Boulevard primarily catered to the motorist.

Substantial civic and institutional development took place in North Park throughout the 1920s. During this period, the community received its first localized branches of public services, including a service station and a post office. Several educational facilities were established, including Park Villas Elementary School and Jefferson Elementary school, as well as two private schools, Saint Augustine Boys' School and the Academy of Our Lady of Peace School for Girls. Between 1922 and 1924, five religious congregations built new facilities in North Park, including Trinity Methodist Church, St. Patrick's Catholic Church, Plymouth Congregational Church, North Park Baptist Church, and St. Luke's Episcopal Church.

Influence of the Great Depression and World War II in North Park: 1930 to 1945

The Great Depression had an immediate impact on what had been one of the fastest growing communities in San Diego, and construction would remain slow into the early 1940s. Residential construction essentially ceased, and many business ventures failed along established commercial thoroughfares such as University Avenue. However, the 1935 California Pacific International Exposition also held in Balboa Park, helped North Park rebound more quickly than other communities. That same year, a sign with the community's name was suspended across the intersection of 30th Street and University Avenue. However, it was United States' entrance into World War II that effectively ended the economic downturn and boosted the regional economy. This was particularly true in San Diego; with its extensive military and manufacturing facilities now devoted to the defense industry, of which proved instrumental with the City receiving the highest per capita share of war contracts in the state.

Post-World War II Development in North Park: 1946 to 1970

Like other large cities, San Diego's wartime and postwar population growth far outpaced its ability to provide sufficient services and housing. However, the formation of the Federal Housing Administration (FHA) helped to reignite the construction of single-family homes, in part, by establishing building guidelines for a modest and affordable single family residence, termed the minimum house. Soon, unimproved lots in established neighborhoods throughout North Park were in filled with single-family homes and residential courts inspired by FHA designs. The exception to this pattern was the area located between Boundary Street and the 805 Freeway, on the eastern edge of North Park, which contains development from the 1940s through the 1970s, alongside some earlier residences. Developers of multi-family housing favored higher densities over the residential courts of the pre- war period. The result was the proliferation of the two-story stucco box apartment building, designed to maximize the number of units and provide the required the parking on a single residential lot.

As the economy slowly began to rebound, new businesses occupied existing storefronts along established commercial corridors, often renovating their facades with more contemporary details. Along University Avenue, new commercial properties were constructed and existing storefronts were renovated, as this area began to shift from a neighborhood retail area to a regional shopping district to compete with the new shopping center in Mission Valley. At the same time, increased reliance on the automobile and local road improvements meant the arrival of new businesses which catered to the needs of the motorist. Auto-related businesses – such as gas stations, car lots, and auto parts stores – began to appear alongside existing grocery stores, meat markets, pharmacies, and clothing shops. Similarly, this trend led to new building forms, such as drive-ins, and pushed commercial structures back on their lots to accommodate surface parking. This was particularly true along El Cajon Boulevard, where nearly 300 new businesses opened between 1940 and 1950.

U.S. Route 395 became San Diego's first freeway when it was built in 1941. The construction of this and other freeways would hasten the decline of the streetcar system throughout the City, including in North Park. By the early 1960s, commercial activity along University Avenue and El Cajon Boulevard began to decline, due in part to the construction of Interstate 8, which drew vehicular traffic away from these thoroughfares. In addition, the opening of nearby shopping centers – such as College Grove, Mission Valley Shopping Center, and Grossmont Center – provided new competition for retail outlets along North Park's commercial corridors. In the 1970s, the commercial areas along University Avenue and El Cajon Boulevard were transformed yet again by new demographics in the area, as people of Chinese, Filipino, and Vietnamese descent moved into the adjacent residential areas. Coupled with the community's own revitalization efforts, North Park experienced a resurgence of neighborhood-oriented businesses.

6.7.1.3 Designated Historical Resources

North Park is home to two National Register-listed resources and one National Register Historic District. National Register-listed resources include the Georgia Street Bridge and the Lafayette Hotel (Imig Manor); the National Register Historic District is the University Heights Water Storage and Pumping Station Historic District. In addition, as of February 2016, the North Park community

contains 102 individually designated City designated historical resources (Figure 6.7-1) and four designated historic districts (Figure 6.7-2) – Shirley Ann Place, University Heights Water Storage and Pumping Station, and the Burlingame and North Park Dryden neighborhoods – containing approximately 300 contributing resources that have been listed on the City's register by the Historical Resources Board. These resources are primarily residential in nature, but also include some institutional and commercial buildings, and are included in the City's database of designated historic resources.

6.7.2 Methodology

6.7.2.1 Historical Resources

The Historic Resources Survey completed for the North Park CPU and associated discretionary actions included a property-by-property inspection of the entire CPU area. Field teams identified individual properties that appeared eligible for individual designation, as well as geographically-definable areas that appeared eligible for designation as historic districts. For districts, boundaries were defined and contributing and non-contributing resources were identified.

All properties identified in the field as potentially eligible for designation were then evaluated using the City of San Diego local designation criteria. Properties determined potentially eligible for designation on the City's Register were then evaluated for the National Register and California Register. All properties identified and evaluated as potentially eligible for listing on the San Diego Register, California Register, and/or National Register designation as part of this survey were then documented in a database.

Included as an appendix to the Historic Resources Survey is the Historic Context Statement prepared for the North Park community. The Historic Context Statement was developed primarily through archival research, and synthesizes information collected from a variety of primary and secondary materials. In addition to consulting the historical resource files at the City Planning Department and the archives at Save Our Heritage Organisation, research was conducted at the San Diego Public Library, the San Diego History Center, and the libraries at the University of California, San Diego. Primary sources included historic maps, photographs and newspapers, and media advertisements. Specifically of particular importance were review of, subdivision maps, in conjunction with Sanborn Fire Insurance Maps, were used to establish broad patterns of development within North Park. Historic photographs provided imagery of the community's evolving landscape and predominant architectural styles. Other primary materials included several articles, advertisements, and editorials from the archives of the Los Angeles Times and San Diego Union. Secondary sources of information were consulted to supplement these primary materials, and included later accounts of history recorded in a variety of books, essays, journals, and master's theses.

Map Source: SanGIS

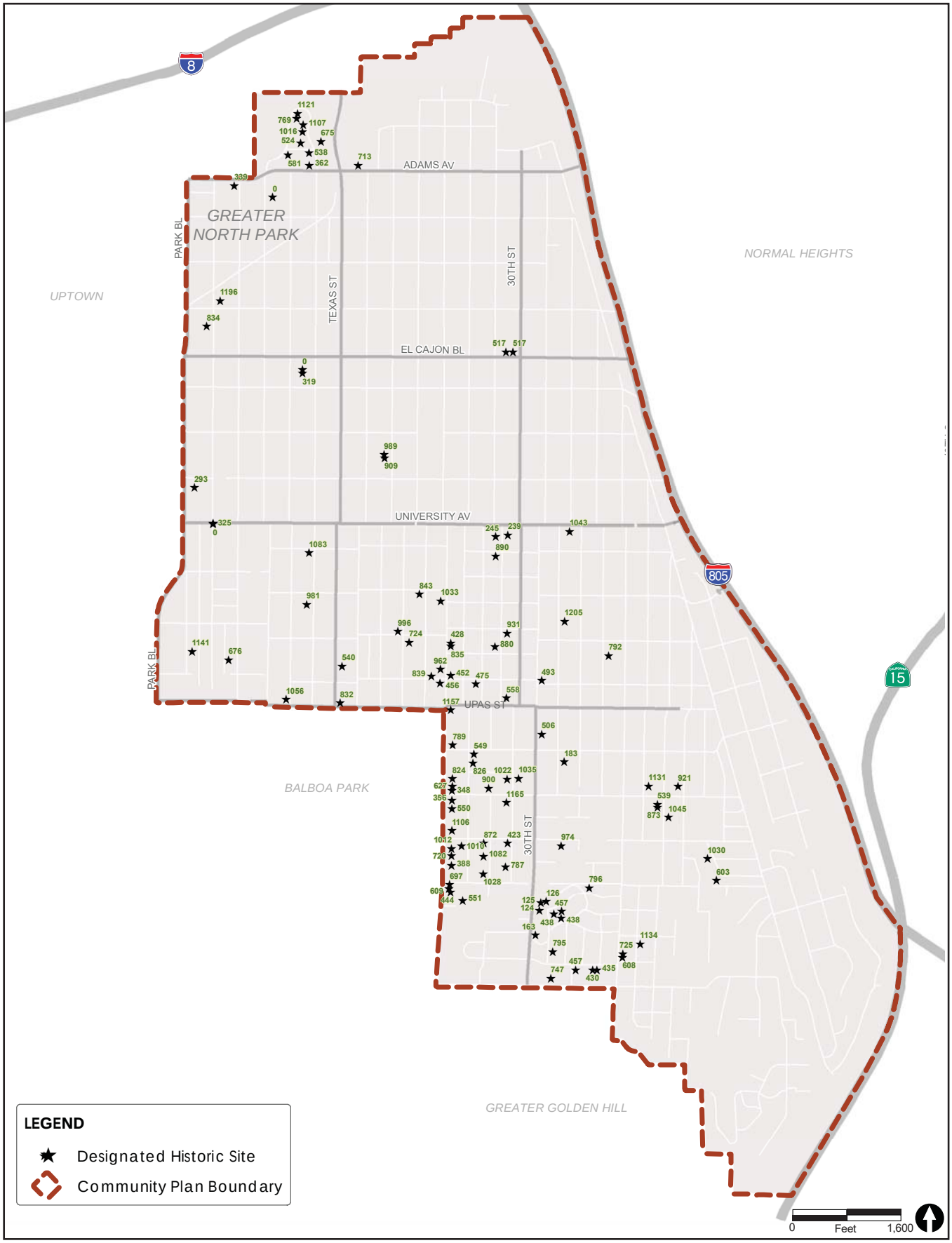


FIGURE 6.7-1

Location of City Register Designated Historic Resources – North Park

Map Source: SanGIS



FIGURE 6.7-2

Location of City Register Designated Historic District – North Park

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6.7.2.2 Prehistoric Resources

Cultural sensitivity levels for the North Park community planning area were rated low, moderate, or high based on regional environmental factors and the results of an archival records search using the California Historical Resources Information System (CHRIS), a literature search of the South Coastal Information Center (SCIC), and a Sacred Lands File check by the Native American Heritage Commission (NAHC).

A low sensitivity rating indicates that there are few or no previously recorded resources within the area. Resources at this rating would not be expected to be complex, with little to no site structure or artifact diversity. The potential for identification of additional resources in such areas would be low. A moderate sensitivity rating indicates that some previously recorded resources were identified within the area. These are more complex resources consisting of more site structure, diversity of feature types, and diversity of artifact types. The potential for the presence of additional resources in such areas would be moderate.

Areas identified as high sensitivity would indicate that the records search identified several previously recorded sites within the area. These resources may range from moderately complex to highly complex, with more-defined living areas or specialized work space areas and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted archaeological resources.

Because the majority of the community is developed and there is very little undeveloped land within the CPU area, with the exception of canyon areas, the cultural sensitivity for the entire community of North Park is considered low. However, at the base of these canyons, especially leading into Los Chollas Valley, there is a potential for cultural resources to be present; therefore, the cultural sensitivity rating in these areas is considered high. As such, the community of North Park contains two sensitivity ratings as illustrated in Figure 6.7-3.

6.7.3 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's Significance Determination Thresholds, consists first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation. Based on the City's 2011 Significance Determination Thresholds, which have been adopted to guide a programmatic assessment of the proposed North Park CPU and associated discretionary actions, impacts related to historical resources would be significant if the project would result in:

An alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object or site;

A substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries.

Map Source: AECOM

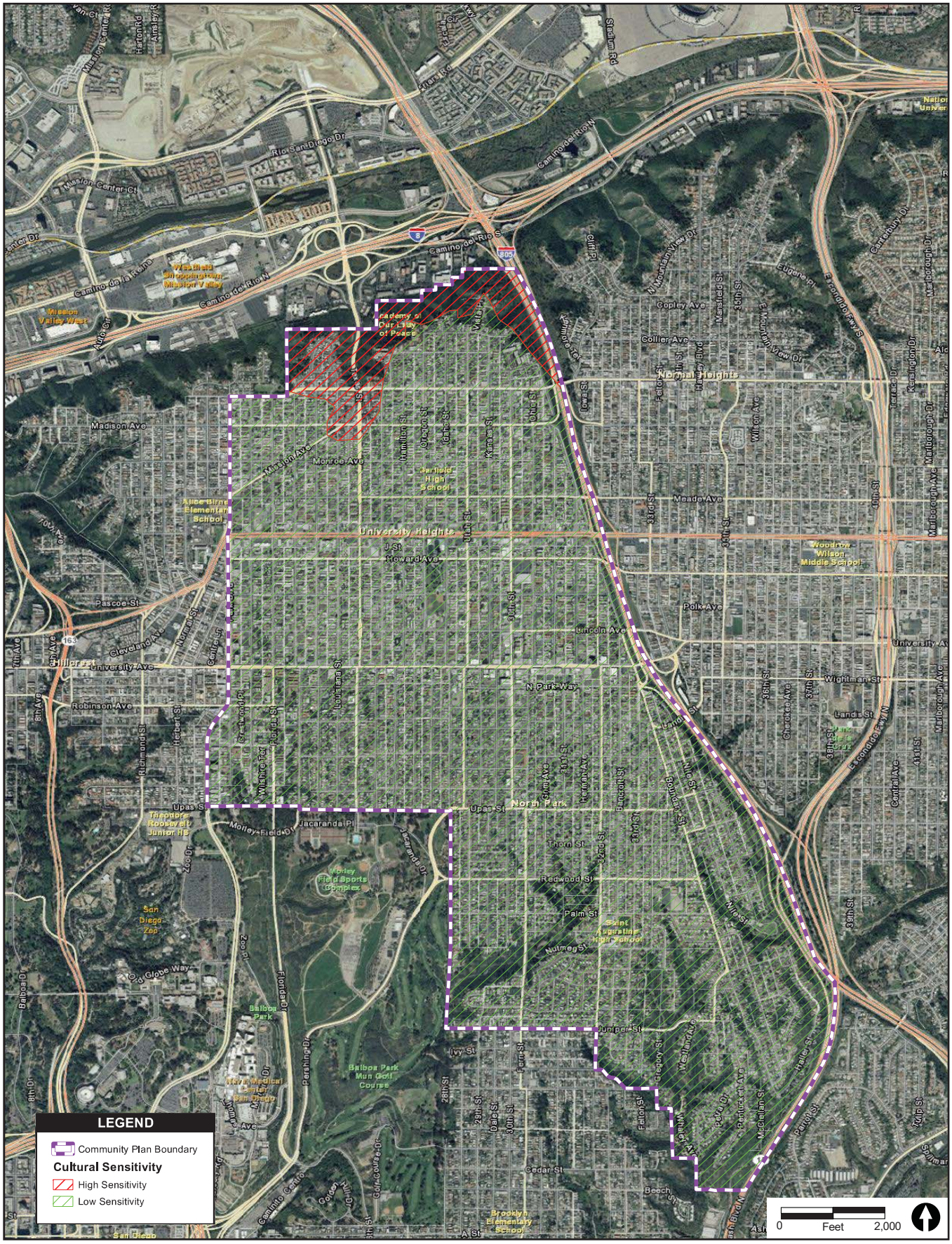


FIGURE 6.7-3
Cultural Sensitivity Areas – North Park

The City of San Diego's CEQA Significance Determination Thresholds define a significant historic resource as one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code; though even a resource that is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA. The City's Historical Resources Guidelines state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site specific technical report prepared as part of the environmental review process.

Research priorities for the prehistoric, ethnohistoric and historic periods of San Diego history are discussed in Appendix A to the City's Historical Resources Guidelines. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50 square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

- The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.

- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

6.7.4 Impact Analysis

Issue 1 Historic Structures, Objects, or Sites

Would implementation of the proposed North Park CPU and associated discretionary actions result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?

a. Historical Resources – National Register and/or Local Register

North Park is home to two properties on the National Register, the Georgia Street Bridge and the Lafayette Hotel, and one historic district on the National Register, the University Heights Water Storage and Pumping Station Historic District. Additionally, 105 individually designated historical resources and four historic districts, which contain approximately 300 contributing resources, have been listed on the City's register by the Historical Resources Board. These designated historical resources are protected and preserved through existing General Plan policies, the Historical Resources Regulations and Guidelines of the Municipal Code, and City policies and procedures. These protections require historic review of all projects that could have the potential to impact these resources. Projects that do not comply with the U.S. Secretary of the Interior Standards for the Treatment of Historic Properties are required to process a development permit for the deviations that is subject to review under CEQA.

b. Individual Local Historic Resources.

As of April 2016, there are 107 properties designated as individual local historical resources in North Park. The Historic Resources Survey identified an additional 47 individual properties that meet one or more of the City's local designation criteria. These include residential (11 single-family and six multi-family), 17 commercial buildings, 12 civic and institutional, and one infrastructure property. Of these, 25 also appear eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. All of the individual properties are listed in the Historic Resources Survey, organized by property type with photos of representative examples, included as Appendix G2 to this PEIR.

c. Potential Historic Districts Identified in the Historic Resources Survey

The Historic Resources Survey identified five potential historic districts which meet one or more of the City's local designation criteria for historical sites (28th Street Residential Historic District, Kalmia Place Residential Historic District, Shirley Ann Place Residential Historic District, Spalding Place Residential Historic District, and 30th Street/University Avenue Commercial Historic District). Additionally, the survey initially identified the Park Boulevard Multi-Family Residential Grouping as an area which may be eligible for designation as a historic district pending future survey work addressing the west side of Park Boulevard. That survey work was completed in conjunction with the adjacent Uptown Survey, which confirmed the presence of a potential historic district across the plan boundaries. This potential historic district has been identified as Park Boulevard Apartment (West) in the proposed Uptown CPU and Park Boulevard Apartment (East) in the proposed North

Park CPU. Of the potential historic districts identified, two also appear eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. A description of each potential district identified in the Historic Resources Survey is provided below and the location of these potential historic districts is identified in Figure 6.7-4.

28th Street Residential Potential Historic District

The 28th Street Residential Historic District is an intact grouping of single-family residences overlooking Balboa Park to the west. Eligible under San Diego criterion A, this potential district is composed of approximately 45 one- and two-story residences, designed primarily in the Spanish Colonial Revival style. It has a period of significance of 1920 to 1939, and is significant under the development themes within the *Development of North Park: 1907 to 1929* and *Influence of the Great Depression and World War II in North Park: 1930 to 1945* contexts. This area currently includes 11 designated local landmarks. This district also appears eligible for listing in the National Register and the California Register.

Kalmia Place Residential Potential Historic District

The Kalmia Place Residential Historic District is an intact grouping of single-family residential properties located along a single U-shaped street overlooking the Balboa Park Golf Course to the west. Eligible under San Diego criterion A, the district boundaries coincide with those of the original Kalmia Place tract, subdivided in 1923. The tract was developed with a comprehensive landscape plan, and its irregular street pattern created lots that took advantage of the natural topography and canyon views. This potential district is composed of approximately 20 properties, designed primarily in the Spanish Colonial Revival, Streamline Moderne, and Modern architectural styles. It has a period of significance of 1920 to 1959, and is significant under the development themes within the *Development of North Park: 1907 to 1929* and *Influence of the Great Depression and World War II in North Park: 1930 to 1945* contexts. The area is marked by a pair of concrete pillars at both the entrance and exit to the district's one-way street. The district also includes a potential individual landmark, a 1937 Streamline Moderne residence at 2848 Kalmia Place.

Shirley Ann Place Residential Historic District Expansion Potential Historic District

The Shirley Ann Place Residential Historic District Expansion would expand the boundaries of the designated historic district. The designated district contains a single block of modest Spanish Colonial Revival single-family residences along both sides of Shirley Ann Place. The expansion would extend the boundaries one half-block east to Texas Street, and one half- block west to Louisiana Street. The entire extent bounded by Texas, Louisiana, Madison, and Monroe, was purchased by the Alberta Security Company in 1924. The west side of Texas and the east side of Louisiana were largely developed that same year with approximately 26 California bungalows on standard residential lots. Sometime between 1925 and 1927, the rear portions of these lots were re-subdivided and developed by the same owners, and the rear alleyway was rededicated as Shirley Ann Place. All of these residences were developed within a narrow period of time (approximately 1924 to 1934). Also, it appears that the residences within the designated district and those in the potential expansion area retain a similar level of integrity. This potential district is eligible under San Diego criterion A, and is significant under the development themes within the *Development in North Park: 1907 to 1929* and *Influence of the Great Depression & World War II in North Park: 1930 to 1945* contexts.

Map Source: SanGIS

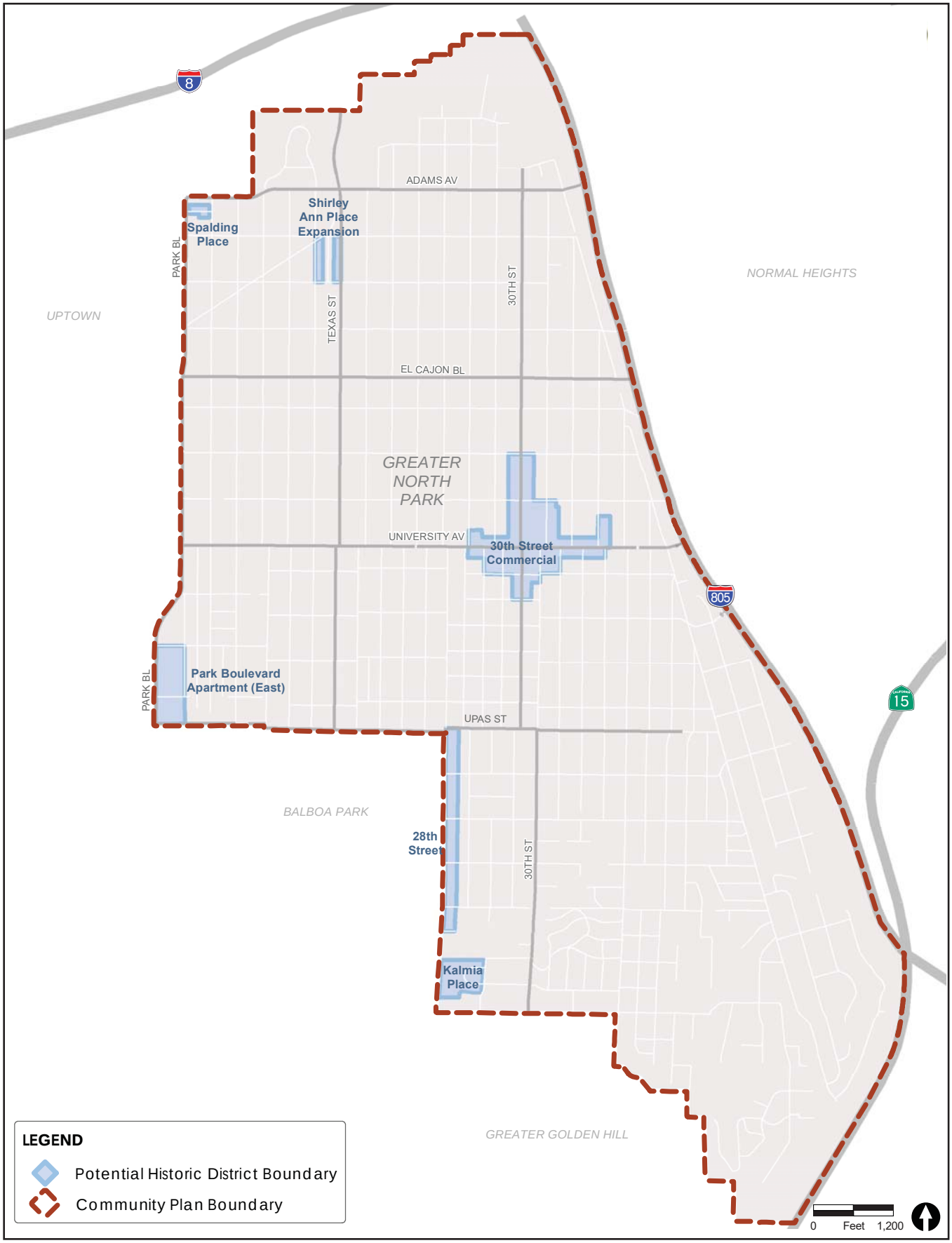


FIGURE 6.7-4

Location of Potential Historic Districts Identified in the Historic Resources Reconnaissance Survey – North Park

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Spalding Place Residential Potential Historic District

The Spalding Place Residential Historic District is an intact grouping of single-family residential properties located along an alleyway near Park Boulevard and Adams Avenue. Eligible under San Diego criterion A, this potential district is composed of approximately 14 modest California bungalows, most of which were constructed in 1909. It has a period of significance of 1909 to 1929, and is significant under the *Development of North Park: 1907 to 1929* context.

30th Street/University Avenue Commercial Potential Historic District

The 30th Street/University Avenue Commercial Historic District is an intact grouping of approximately 130 commercial properties. Commercial development began here in 1912, when the 30th Street Streetcar Line was extended northward to intersect with the University Avenue Line. During this period, businesses primarily catered to the needs of local residents. In the 1920s and 1930s, the area experienced a major expansion, making 30th Street and University Avenue the city's largest commercial center outside of downtown. In the 1950s, many storefronts were modernized, often with large display windows. This potential district is eligible under San Diego criterion A, with a period of significance of 1912 to 1959. It is significant under the *Development of North Park: 1907 to 1929* context; the *Influence of the Great Depression & World War II in North Park: 1930 to 1945* context; and the *Post- World War II Development in North Park: 1946 to 1970* context. The district includes two designated local landmarks: the North Park Theater at 2893-2899 University Avenue, and the storefronts at 2911-2917 University Avenue. It also includes three potential landmarks: the Newman Building at 2900-2912 University Avenue; the J.C. Penney Building at 3029 University Avenue; and the commercial building at 3937-3939 Iowa Street. This district also appears eligible for listing in the National Register and the California Register.

Park Boulevard Apartment (East) Potential Historic District

The Park Boulevard Apartment (East) potential historic district is a collection of 1920s and 1930s multi-family residences located along both sides of Park Boulevard north of Upas. Known today as "Park Boulevard Apartment Row," this area was targeted for higher-density development in the 1920s in order to maximize residential units within a limited space. These apartment buildings were designed to be compatible in scale with the surrounding single-family neighborhoods. Earlier examples were designed in the Spanish Colonial Revival or Renaissance Revival styles, reflecting the influence of the 1915 Panama-California Exposition. One of the most prominent structures along Apartment Row is the Embassy Hotel at 3645 Park Boulevard, which originally opened in 1929 as "The Padre." This property has been identified as a potential landmark. This potential historic district straddles two community plan areas (CPAs): the area west of Park Boulevard is in the Uptown CPA; the area east of Park is in the North Park CPA. The North Park portion of this potential district is composed of 33 properties which were evaluated as part of this survey. Of these, approximately 50 percent were evaluated as contributors.

d. Multiple Property Listing

The Historic Resources Survey identified a Multiple Property Listing (MPL) potentially eligible for listing in National Register of Historic Places, the California Register of Historical Resources, and the City of San Diego Register or Historic Resources.

The Residential Court MPL is a discontiguous grouping of approximately 95 residential courts located throughout the North Park CPU area. This includes 90 residential courts identified by the initial reconnaissance survey and an additional 5 residential courts identified by the community and confirmed by staff through a windshield survey. A tabular listing of all properties within the MPL is provided in the Historic Resources Survey. The residential courts were not developed in geographic clusters; rather, they were built as infill in previously established single-family neighborhoods. The MPL has a period of significance of 1920 to 1959, and is significant within the *Development of North Park: 1907 to 1929* context; the *Influence of the Great Depression & World War II in North Park: 1930 to 1945* context; and the *Post-World War II Development in North Park: 1946 to 1970* context. The term "residential court" includes both pre-war detached-unit "bungalow courts," as well as post-war linear courts. Earlier examples were designed in the Craftsman/California Bungalow, Spanish Colonial Revival, and American Colonial Revival style; later examples are Streamline Moderne, Minimal Traditional, or Modern in style.

e. Resources Identified Through Public Outreach

Substantial public outreach with the North Park Planning Group, regional and local preservation groups, and members of the community occurred throughout the development of the Historic Context and completion of the Historical Resources Survey for the North Park CPU. This information was considered and often incorporated into the results and recommendations of the survey. Following distribution of the Draft Survey Report, City staff conducted additional outreach with these groups to identify any resources not included in the survey that the community believed to be historically significant. Based on the results of this outreach, additional resources have been identified as potentially significant, requiring additional site-specific evaluation. These resources are identified in the Historic Preservation Element and in Section 5.0 of the Historic Resources Survey.

In addition to these individual resources, five additional potential historic districts - Valle Vista Terrace; Park Villas; Altadena/Carmel Heights/Frary Heights; Wabash Mesa; and St. Louis Heights/Lynhurst/O'Nealls Terrace/Wallace Heights - were identified by the community. The potential eligibility of these historic districts has been verified through a windshield survey completed by City staff. Therefore, these potential historic districts have been identified both in the Historic Preservation Element, and in the appendices to the Historic Resources Survey (Figure 6.7-5).

f. Regulatory Framework

Although the proposed North Park CPU and associated discretionary actions do not propose specific development, future development and related construction activities facilitated by the proposed North Park CPU and associated discretionary actions at the project level could result in the alteration of a historic building, structure, object, or site. Direct impacts may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, sites and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance.

Map Source: SanGIS



FIGURE 6.7-5

Location of Potential Historic Districts Identified by the Community – North Park

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~~Section 143.0212 of the SDMC requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register. In these cases, this review is supplemented with a project specific records search of the NAHC Sacred Lands File and California OHP CHRIS data by qualified staff, and as stated above, a site specific archaeological survey would be required. For any subsequent projects implemented in accordance with the proposed North Park CPU and associated discretionary actions where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2., in accordance with Assembly Bill 52. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project and appropriate mitigation measures for direct impacts that cannot be avoided.~~

The City's Historical Resources Regulations and the Historical Resources Guidelines provide protection of significant and potentially significant historic resources and provides a mechanism for requiring surveys during future discretionary and ministerial development activities. SDMC Section 143.0212 requires review of ministerial and discretionary permit applications impacting parcels containing buildings 45 years old or older to determine whether or not the project has the potential to adversely impact a resource which may be eligible for individual listing on the local register. When it is determined that a resource may exist and the project proposed would constitute a significant impact to that resource, a site specific survey is required and may be forwarded to the Historical Resources Board to consider designation and listing of the property. If designated, a Site Development Permit with deviation findings and mitigation would be required for any substantial modification of the resource. Potential individual resources and resources identified as part of the MPL, which are evaluated as single resources independent of other buildings, would be protected to a large extent through SDMC Section 143.0212. However, because this regulation limits the evaluation of historical resources to the project parcel and individual eligibility, resources identified as potentially contributing to a potential historic district, would not be protected unless they were also eligible individually.

The proposed North Park CPU contains a Historic Preservation Element that supports the Historic Preservation Element of the General Plan through goals and policies for identifying and preserving historical resources, and educating citizens about the benefits of, and incentives for, historic preservation. Additional policies supporting the identification and preservation of historical resources are also included in the Land Use, Urban Design, and Conservation Elements of the proposed North Park CPU. Policies seek to preserve and enhance the historic character of the North Park community and facilitate the identification, designation, and preservation of historically and culturally significant resources throughout the North Park CPU area. Proposed policies also seek to preserve and rehabilitate historic resources. Proposed policies would reduce direct impacts on historical resources by ensuring that such resources are identified and appropriately designated; encouraging preservation, rehabilitation, and adaptive reuse of historic structures instead of demolition or other significant alterations as part of future development.

The proposed North Park CPU includes a policy that calls for the implementation of supplemental development regulations~~interim protection measures~~ to preserve the integrity and eligibility of the potential historic districts, which are afforded very limited protection under existing regulations. In response to this policy, amendments to the Historical Resources Regulations are proposed to provide supplemental development regulations to address how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts. Development that does not comply with the regulations of the supplemental development regulations would be subject to a Neighborhood Development Permit with deviation findings and mitigation. The amendments to the Historical Resources Regulations would be adopted concurrent with the proposed North Park CPU.

While the Municipal Code does provide for the regulation and protection of designated and potential historical resources, and amendments to the Historical Resources Regulations would be consistent with the policies of the Historic Preservation Element to provide additional protection for specified potential historic districts, it is impossible to ensure the successful preservation of all historic built environment resources within the North Park CPU area. Therefore, potential impacts to the potential historic districts are considered significant and unavoidable.

Impact 6.7-1 Implementation of the proposed North Park CPU and associated discretionary actions could result in an alteration of a historic building, structure, object, or site.

Issue 2 Prehistoric Resources, Sacred Sites, and Human Remains

Would implementation of the proposed North Park CPU and associated discretionary actions result in a substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or disturbance of any human remains, including those interred outside of formal cemeteries?

Although the proposed North Park CPU and associated discretionary actions do not propose specific development at this time, future development and related construction activities facilitated by the proposed North Park CPU and associated discretionary actions at the project level could result in the alteration or disturbance of prehistoric archaeological resources, tribal cultural resources, existing religious or sacred lands; or human remains. Grading, excavation, and other ground-disturbing activities associated with future development could affect important (as determined per the Historical Resources Guidelines) archaeological sites or traditional cultural properties that would constitute a significant direct impact.

The City has developed Historic Resource Sensitivity Maps that provide general locations of where historical resources are known to occur or have the potential to occur. These maps were developed in coordination with technical experts and tribal representatives. Upon submittal of ministerial and/or discretionary permit applications, a parcel is reviewed against the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register (SDMC Section 143.0212).

~~The City's Historical Resources Regulations (Section 143.0212 of the SDMC) requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the~~

~~Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource.~~ This review is supplemented with a project specific records search of the NAHC Sacred Lands File and California OHP CHRIS data by qualified staff. Additionally, a site specific archaeological survey would be required in accordance with Municipal Code requirements. For any subsequent projects implemented in accordance with the proposed North Park CPU and associated discretionary actions where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52. Results of the consultation process would determine the nature and extent of any additional archaeological evaluation or changes to the proposed project and appropriate mitigation measures for direct impacts that cannot be avoided.

Avoiding impacts on religious or sacred places or human remains may be unavoidable in certain circumstances when resources are discovered during construction. Although there are no known religious or sacred uses within the North Park CPU area, there is potential for these to be encountered during future construction activities associated with implementation of the proposed North Park CPU and associated discretionary actions, particularly given the high cultural sensitivity of canyon areas leading into the Mission Valley area.

Similarly, there are no known human remains interred outside of formal cemeteries. However, there are many areas within the City where previously unknown prehistoric human remains and prehistoric sites have been uncovered during both archaeological investigations and grading activities. State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. In accordance with State law, these procedures would be followed in the event of accidental discovery of human remains. Specifically, as specified by California Health and Safety Code Section 7050.5, if human remains are found on a project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office by telephone. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. However, the potential for encountering human remains during construction activities remains a possibility. Therefore, significant impacts on religious or sacred use sites or human remains may occur as a result of future development implemented in accordance with the proposed North Park CPU and associated discretionary actions.

The proposed North Park CPU is designed to support the historic preservation goals of the City's General Plan, and contains policies requiring protection and preservation of significant archaeological resources in the Historic Preservation Element of the proposed North Park CPU. Native American consultation early in the project review process is also included in the CPU to identify tribal cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines.

While existing regulations, the Municipal Code, and proposed North Park CPU policies would provide for the regulation and protection of archaeological resources and human remains, it is impossible to ensure the successful preservation of all archaeological resources within the North Park CPU area. Therefore, potential impacts to archaeological resources are considered significant.

Impact 6.7-2 Implementation of the proposed North Park CPU and associated discretionary actions could adversely impact a prehistoric archaeological resource including religious or sacred use sites and human remains.

6.7.5 Significance of Impacts

Implementation of the proposed North Park CPU and associated discretionary actions could result in an alteration of a historic building, structure, object, or site (Impact 6.7-1) and could adversely impact a prehistoric archaeological and tribal cultural resources including religious or sacred use sites and human remains (Impact 6.7-2). These impacts would be potentially significant.

6.7.6 Mitigation Measures

The City of San Diego's General Plan, combined with Federal, State, and local regulations, provide a regulatory framework for project-level historical resources evaluation/analysis criteria and when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; tribal cultural resources, and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the subsequent project review process. The following mitigation measures (HIST-6.7-1 and HIST 6.7-2) provide a framework that would be required of all development projects with the potential to impact significant historical resources.

HIST 6.7-1 HISTORIC BUILDINGS, STRUCTURES, AND OBJECTS

Prior to issuance of any permit for a development project implemented in accordance with the proposed North Park CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- Preparing a historic resource management plan;

- Adding new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource; and
- Shielding historic properties from noise generators through the use of sound walls, double glazing and air conditioning.

Specific types of historical resource reports, outlined in Section III of the Historical Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

To further increase protection of potential resources – specifically potential historic districts – the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation.

HIST-6.7-2 ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES

Prior to issuance of any permit for a ~~future~~ development project implemented in accordance with the proposed North Park CPU that could directly affect an archaeological or tribal cultural resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, 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 prehistoric Native American activities.

Initial Determination

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological

evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains a historical resource, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeologicaly Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City Guidelines, must be performed by a qualified archaeologist.

Step 2

Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2., in accordance with Assembly Bill 52. It should be noted that during the consultation process tribal representative(s) will be directly involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires

reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required ~~will~~ shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program shall be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. 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. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates 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.

Step 3:

Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable or project specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft

CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American ~~Traditional Cultural Property~~tribal cultural resource or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4:

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological

resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and tribal cultural resources containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5:

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards, unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act [U.S.C. 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources area suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations, Part 79 ~~of the Federal Register~~. Additional information regarding curation is provided in Section II of the Guidelines.

6.7.7 Significance of Impacts after Mitigation

6.7.7.1 Historic Structures, Objects or Sites

Development implemented in accordance with the proposed North Park CPU and associated discretionary actions that would potentially result in impacts to significant historical resources would be required to incorporate feasible mitigation measures adopted in conjunction with the certification of this PEIR and consistent with existing requirements of the Historic Resources Regulations and Historic Resources Guidelines. The mitigation framework combined with the proposed North Park CPU policies promoting the identification and preservation of historical resources in the North Park CPU area would reduce the program-level impact related to historic resources of the built environment. However, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis.

With respect to potential historic districts, while supplemental development regulations ~~interim protection measures~~ are proposed, until such time as they are intensively surveyed, verified and brought forward for designation consistent with City regulations and procedures, potential impacts to the potential historic districts would remain significant and unavoidable. Thus, potential impacts to historic resources including historic structures, objects or sites and historic districts would be significant and unavoidable.

6.7.7.2 Prehistoric Resources, Sacred Sites, and Human Remains

Development implemented in accordance with the proposed North Park CPU and associated discretionary actions would potentially result in impacts to significant archaeological and tribal cultural resources, and therefore would be required to implement mitigation measure HIST-6.7-2, which addresses measures to minimize impacts to archaeological and tribal cultural resources. This mitigation, combined with the policies of the General Plan and proposed North Park CPU promoting the identification, protection and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historic Resources Regulations (SDMC Section 143.0212) which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps would reduce the program-level impact related to prehistoric or historical archaeological resources and tribal cultural resources. However, even with application of the existing regulatory framework and mitigation framework, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, impacts to prehistoric resources, sacred sites, and human remains would be minimized, but not to below a level of significance.

6.8 Biological Resources

A Biological Resources Report for the Uptown, North Park, and Golden Hill Community Plan Updates (CPUs) was prepared by RECON (March 2, 2016). That analysis addresses biological impacts associated with the proposed North Park CPU. The entire report is included as Appendix H to this draft Program Environmental Impact Report (PEIR) and forms the basis for the discussion in this section.

6.8.1 Existing Conditions

The existing environmental setting including a description of the sensitive biological resources and regulatory framework are summarized in Chapters 2 and 5, respectively.

A general description of vegetation communities, land cover types, and sensitive plant and wildlife species within the CPU areas is described in Section 2.3.8. The specific vegetation communities/land cover types that occur within the North Park community are shown in Figure 6.8-1. Table 6.8-1 lists acreages per vegetation community/land cover type.

Table 6.8-1
Vegetation Communities and Land Cover Types within the North Park CPU Area

Vegetation Community/ Land Cover Type	MSCP Tier	Acreage
Coastal Sage Scrub	II	100.0
Chaparral	III	61.2
Grassland	III-B	0.6
Disturbed land	IV	65.0
Urban/developed	IV	2,026.9
TOTAL	--	**2,253.7**

MHPA Boundary Corrections

A comprehensive communitywide Multi-Habitat Planning Area (MHPA) boundary line correction is associated with the North Park CPU. The MHPA boundary line correction was considered in coordination with the Wildlife Agencies and is consistent with the goals of the Multiple Species Conservation Program (MSCP) to conserve biological resources and to exclude legally developed and required uses (i.e., structures, streets, brush management zone 1). As shown in Table 6.8-2, the comprehensive MHPA boundary correction for the North Park Community Plan area results in a net deletion of 6.8 acres from the MHPA. However, this correction takes into account removing 23.2

Image source: SanGIS (flown May 2012)

North Park Community Plan Boundary

Existing Vegetation Communities and Land Cover Types

- Coastal Sage Scrub
- Chaparral
- Grassland
- Disturbed Land
- Urban/Developed

0 Feet 1,400

FIGURE 6.8-1

Existing Vegetation Communities and Land Cover Types – North Park

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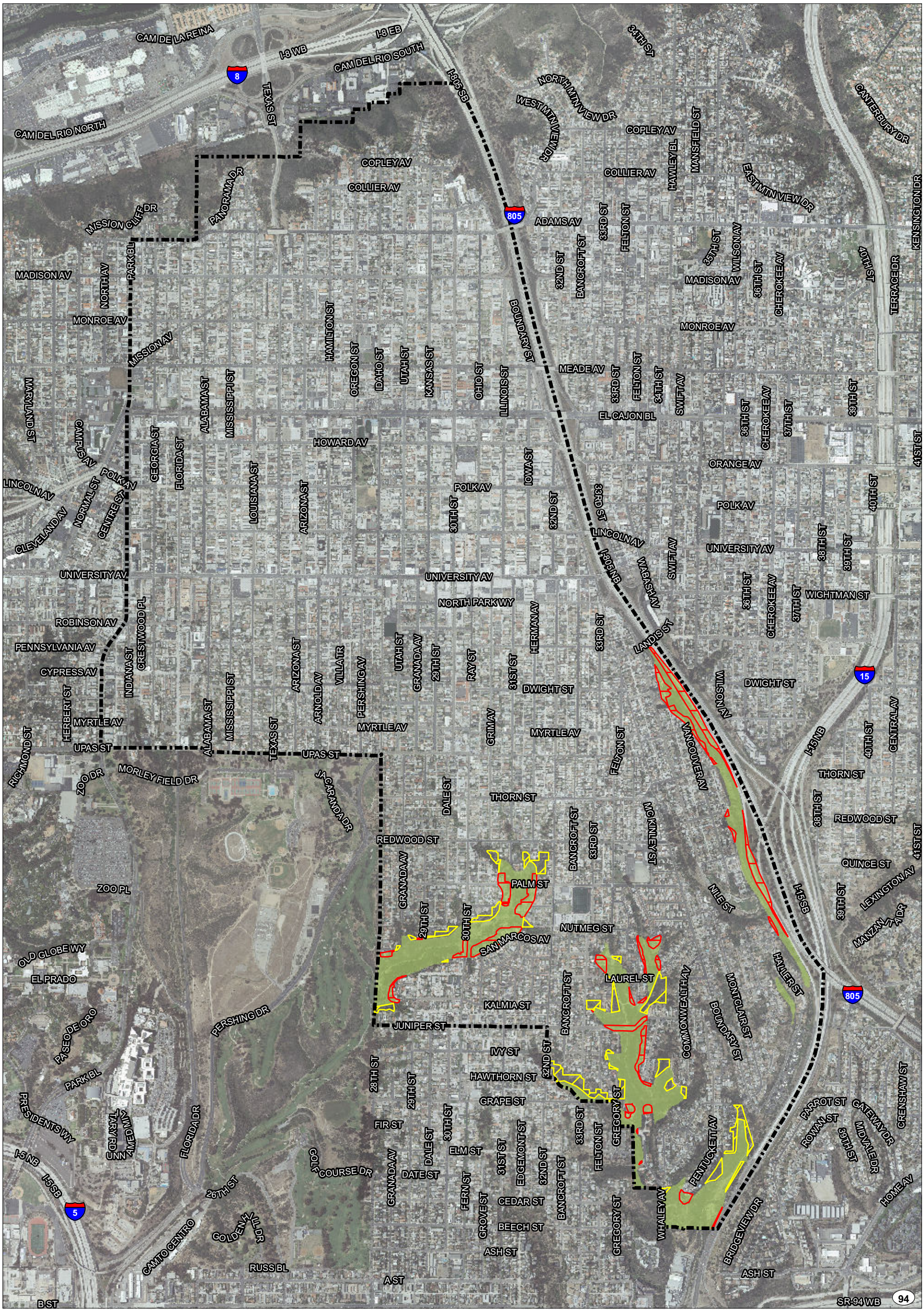
acres of disturbed and developed land from the MHPA. With regards to actual vegetation communities (coastal sage scrub and chaparral), the boundary correction results in a net addition of 9.3 acres to the MHPA, as well as 7.1 acres of disturbed land. Preservation of sensitive habitat is consistent with the goals of the MSCP, the Conservation Element for the Community Plan, and the City's ESL regulations. The MHPA correction removes existing development (i.e., structures and streets), as well as the 35-foot Brush Management Zone 1 area, as required in accordance with the City's Land Development Code, Section 142.0412.

Table 6.8-2
Modifications to Vegetation Communities and Land Cover Types as a Result of the MHPA Boundary Line Correction at North Park (acres)

Vegetation Community/ Land Cover Type	Existing Acreage in MHPA	MHPA Addition	MHPA Deletion	Change in MHPA	Total Acreage in MHPA
Coastal sage scrub	100.0	8.8	0.1	+8.7	108.7
Chaparral	61.2	0.5	0	+0.5	61.7
Grassland	0.6	--	--	--	0.6
Disturbed land	65.0	6.1	1.4	+5.7	70.7
Developed	2,026.9	0	21.7	-21.7	2,005.2
TOTAL	2,253.7	16.4	23.2	-6.8	2,246.9

As shown in Figure 6.8-2, a majority of the MHPA boundary line correction removed developed and disturbed land while adding sensitive habitats, which include coastal sage scrub, and chaparral,; and no change in grassland acreage in MHPA. City-owned lands within designated Community Plan open space areas adjacent to the existing MHPA have also been added to the MHPA. Additionally, the MHPA boundary was corrected by shifting the boundary to the rear portion of many private parcels thereby resulting in the removal of existing single-family homes and Brush Management Zone 1, while adding sensitive resources. In a few cases, sensitive habitat located within designated Community Plan open space on private land was added to the MHPA in order to expand the local wildlife corridor and increase the viability and connectivity of sensitive habitat within the existing MHPA. Regardless of the MHPA boundary line correction, these addition areas are regulated through Environmentally Sensitive Lands (ESL) for sensitive biological resources and steep slopes. The MPHA boundary line correction does not add or increase any regulations associated with City projects, such as sewer line repairs within the canyons. These projects would continue to be conducted in accordance with the Canyon Sewer Cleaning Program (LDR No. 6020), Council Policies 400-13 and 400-14, and Community Plan policies related to this program. Correcting the MHPA boundary also does not relieve projects from having to otherwise comply with the City's MHPA Land Use Adjacency Guidelines, described below. The MHPA correction results in an overall benefit to the MHPA and is consistent with the goals and policies of the MSCP and the North Park CPU.

Image source: SanGIS (flown May 2012)



North Park Community Plan Boundary

MHPA Existing

MHPA Delete

MHPA Add

FIGURE 6.8-2

Location of MHPA Boundary Line Correction – North Park

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6.8.1.2 Methodology

Data on vegetation, MHPA boundary corrections, and open space were obtained from data on file with the City of San Diego. The CPU boundaries are also maintained by the City of San Diego. Base data files were modified as noted below to correct data to match the existing condition.

The analysis of biological resources for the North Park CPU area was performed at the plan-level using the existing base date files and other available data. Data from the California Natural Diversity Data Base (CNDDB) were used to provide information on potential sensitive plant and wildlife species occurrences. Additional geographic information system (GIS) data were used to provide more detailed information on areas of potential effect within the North Park CPU area. These additional data included the location of individual private lots that helped identify areas where brush management could occur in the future.

a. Vegetation Communities

The base vegetation community mapping was taken primarily from the San Diego Association of Governments (SANDAG) digital files for the MSCP. This vegetation mapping was updated using information from an aerial photograph of the area (SanGIS 2012).

Field work was conducted to verify the type of vegetation occurring in specific areas within the North Park CPU boundaries where there were questions about the existing vegetation mapped. In particular, some individual lots identified as potentially having greater than one-tenth of an acre of native vegetation where corrections to the MHPA boundary are proposed were field checked.

Vegetation community classifications follow Holland (1986) and Oberbauer (1996). Assessments of the sensitivity of habitats are based primarily on the California Native Plant Society (CNPS), the CNDDB, U.S. Fish and Wildlife Service (USFWS), and Holland.

b. Sensitive Plants

The locations of sensitive plant species evaluated are from the CNDDB. Nomenclature for plant species follows the Jepson Online Interchange and assessments of the sensitivity of species are based primarily on CNPS, State of California, City of San Diego, and USFWS.

c. Sensitive Wildlife

The locations of sensitive wildlife species evaluated are from the CNDDB. Zoological nomenclature for birds is in accordance with the American Ornithologists' Union Checklist and Unitt (2004); for mammals with Jones et al. (1997); for amphibians and reptiles with Crother et al. (2008); and for butterflies with Brown et al. (1992). Assessments of the sensitivity of species are based primarily on State of California and USFWS.

6.8.2 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (2011), which have been adapted to guide a programmatic analysis for the North Park CPU and associated discretionary actions, impacts on biological resources would be significant if the project would result in:

1) A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS;

2) A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;

3) A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;

4) Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites; or

5) A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan or local policy protecting biological resources, either within the MSCP plan area or in the surrounding region.

6.8.3 Impact Analysis

Issue 1 Sensitive Wildlife Species

Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

The proposed North Park CPU presents goals and policies for biological resources in the Conservation Element. The purpose of the Conservation Element is to provide for the long-term conservation and sustainable management of natural resources, recognizing they define the identity of the community, contribute to its economy, and improve its quality of life. Implementation of the Conservation Element policies and recommendations through development project review, infrastructure investment, and individual action is intended to conserve natural resources.

As part of the proposed North Park CPU, areas designated as open space in the CPU area were reconfigured to remove areas of existing development to better correlate with the actual location of

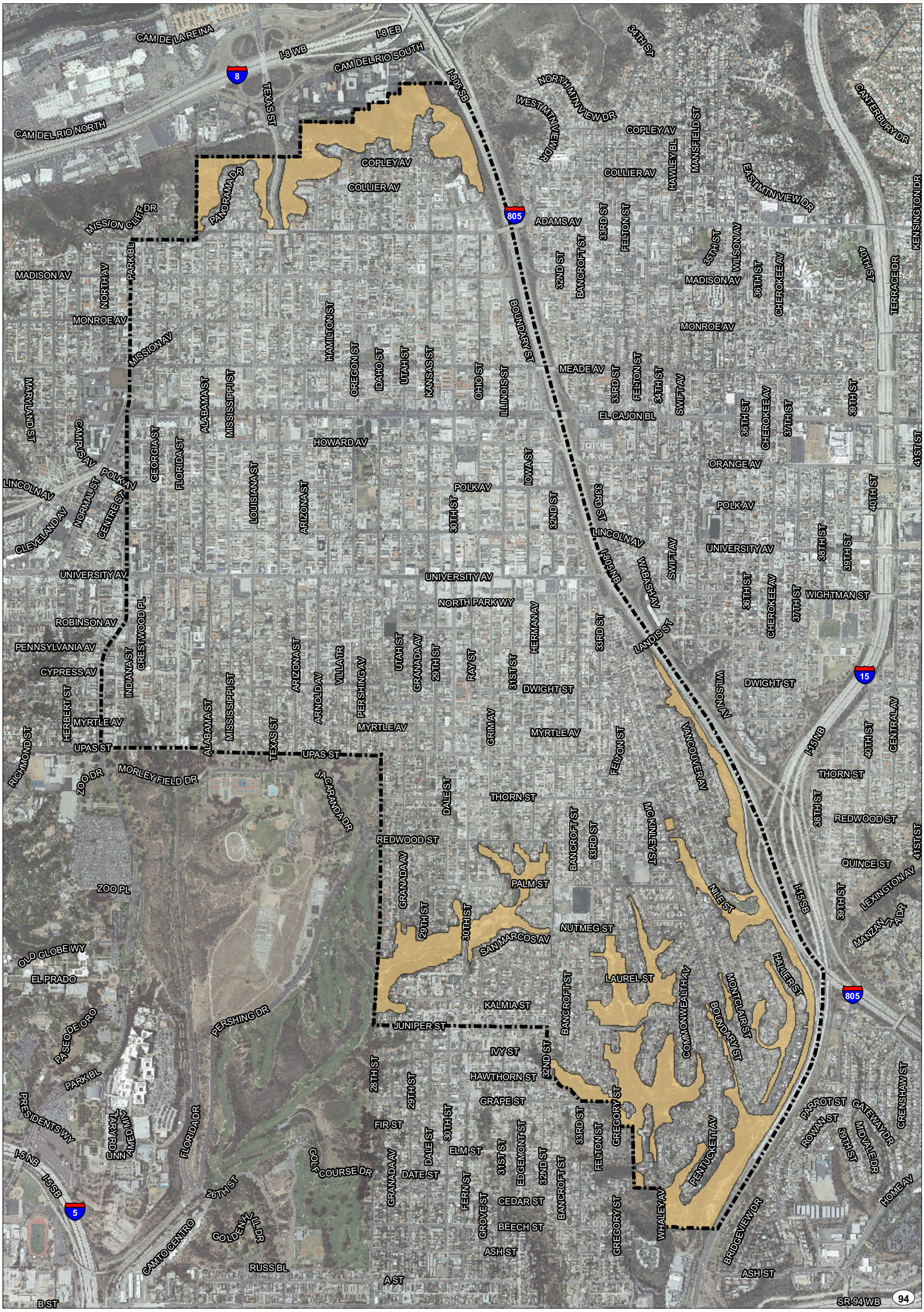
sensitive biological resources intended for conservation. The open space boundary was reconfigured consistent with the General Plan Land Use and Community Planning Element policies for designation of open space and the General Plan and Community Plan Conservation Element policies regarding the protection of natural habits and rare plants and animals. The location of proposed designated open space areas for the North Park CPU area are shown on Figure 6.8-3, and acreages summarized by habitat are provided in Table 6.8-3. By locating all remaining sensitive natural resources within the CPU area within the open space designation and/or MHPA, impacts to sensitive species would be minimized.

There is a small potential that wildlife would be displaced and some small mammals, amphibians, and reptiles with low mobility would be inadvertently harmed during future project activities (e.g., Brush Management Zone 1 or re-development of a lot). However, any impacts to these wildlife species would be less than significant, as these common wildlife species are not considered sensitive by the City. As detailed in Section 2.3.8.4, the only sensitive wildlife species known to occur in the North Park CPU area is California gnatcatcher (Figure 6.8-4). However, implementation of the proposed North Park CPU and associated discretionary actions have a low potential to result in impacts to California gnatcatcher because the species is likely to occur within canyon bottoms and within areas of undisturbed native habitats. There would be no development potential in these areas due to the open space designation and/or MHPA designations. Additionally, it is unlikely that the remnant urban canyon system that exists within the North Park CPU area would support a regionally significant population of coastal California gnatcatcher or other sensitive species. Potentially occurring sensitive species would be conserved in accordance with ESL regulations, the City's Biology Guidelines, and the provisions of the MSCP Subarea Plan. Thus, impacts to sensitive species resulting from build-out of the CPU area would be less than significant.

Table 6.8-3
Proposed Open Space for North Park
(acres)

Vegetation Community/Land Cover Type	Open Space
Coastal Sage Scrub	99.7
Chaparral	60.7
Grassland	0.6
Disturbed Land	59.9
Urban/Developed	0.1
TOTAL	**200.1**

Image source: SanGIS (flown May 2012)



North Park
Community Plan Boundary

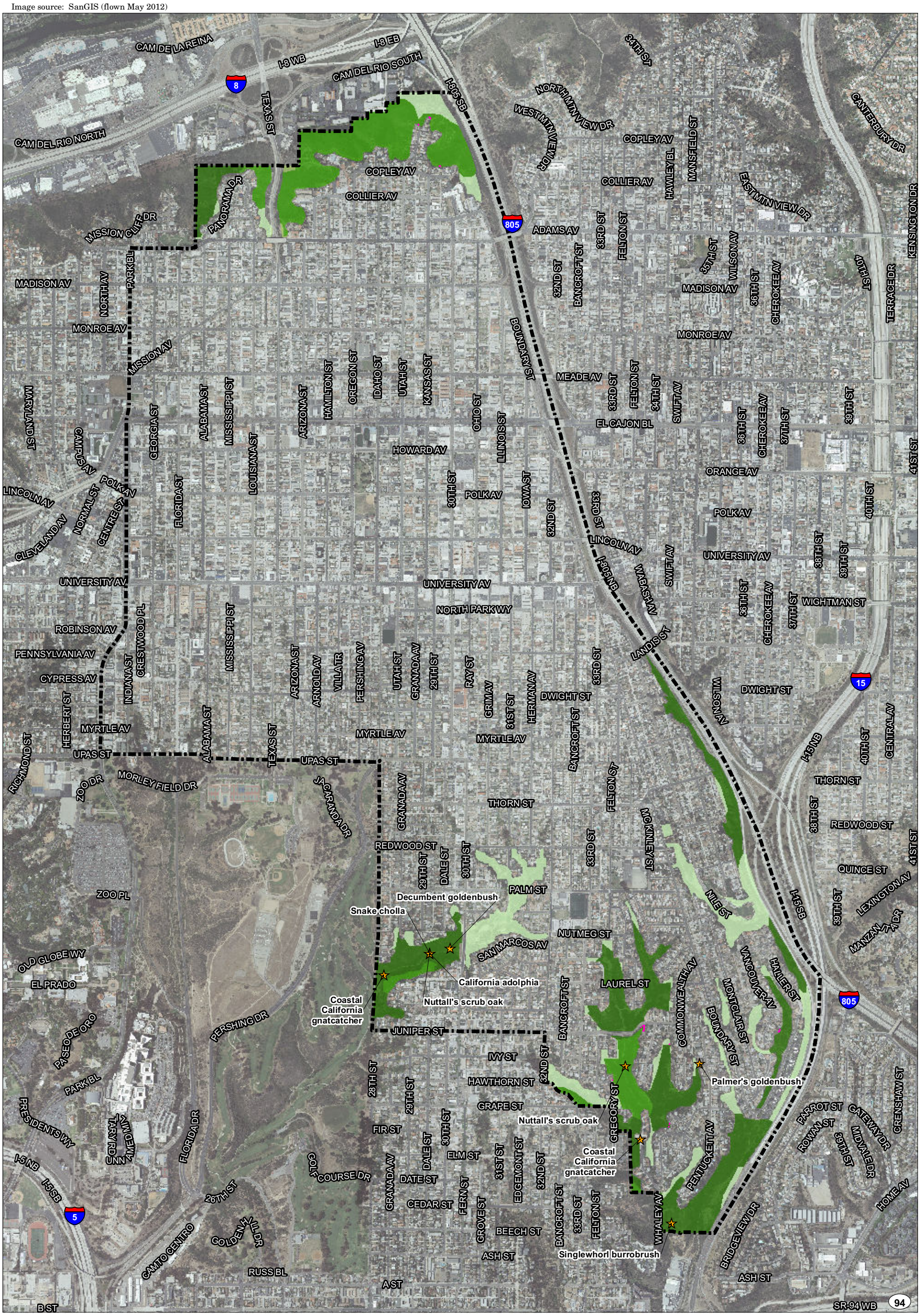
Proposed Open Space

FIGURE 6.8-3

Location of Open Space – North Park

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Image source: SanGIS (flown May 2012)



North Park Community Plan Boundary

Sensitive Species (Source: CNDDB)

Potential Impact Area

Sensitive Vegetation Communities

- Tier II
- Tier IIIA
- Tier IIIB
- Tier IV

FIGURE 6.8-4

Location of Sensitive Biological Resource Impacts – North Park

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Issue 2 Sensitive Habitats

Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

a. Sensitive Vegetation Communities

As detailed in Chapter 2.0 Environmental Setting (Section 2.3.8), The North Park CPU area has sensitive vegetation communities (Tier II – coastal sage scrub, Tier III – chaparral; Tier IIIB – grassland) primarily within the canyons and at the community's northern perimeter. The remainder of the North Park CPU area is built out and supports very little sensitive vegetation communities. Implementation of the proposed North Park CPU and associated discretionary actions would impact primarily disturbed land and urban/developed land which are not considered sensitive vegetation communities.

A relatively small acreage of sensitive vegetation that is outside of the MHPA or designated open space that occurs along the edges of the canyons and within areas that could be subject to Brush Management Zone 1 clearing or re-development of a parcel or existing structures. Potential impacts to sensitive vegetation communities could include the loss of coastal sage scrub and chaparral habitat (Figure 6.8-3). However, the plan level analysis showed that these potential impacts would occur over numerous individual lots and impacts to a single lot would not exceed the 0.10-acre significance threshold contained in the City's significance guidelines; therefore, these potential impacts would be considered less than significant. Furthermore, all projects with sensitive biological resources would require subsequent environmental review under the City of San Diego ESL regulations.

Additionally, these small losses would not significantly affect the regional distribution of these vegetation communities. Implementation of the proposed North Park CPU policies and future compliance with established development standards contained in the City's ESL Regulations and Biology Guidelines as well as the MSCP Subarea Plan and Land Use Adjacency Guidelines would ensure that biological resource impacts remain below a level of significance.

b. Sensitive Plants

Implementation of the proposed North Park CPU has a low potential to impact any of the six sensitive plant species previously recorded in the North Park community (refer to Figure 6.8-3). Sensitive species documented within the CPU area include singlewhorl burrobrush, Palmer's goldenbush, decumbent goldenbush, Snake cholla, Nuttall's scrub oak, and California adolphia (see Figure 6.8-3). Palmer's goldenbush (a MSCP-covered species and a CNPS List 1B.1 species) can be found in drainages and coastal sage scrub. Snake cholla (a narrow endemic species under the MSCP and has a CNPS Rare Plant Ranking of 1B.1) occurs within coastal sage scrub and chaparral habitats. Additional plant species in the CPU area that are not covered in the MSCP, but are considered rare and occurring on the CNPS List include: Nuttall's scrub oak (a CNPS Rare Plant Ranking of 1B.1) and California adolphia (a CNPS Rare Plant Ranking of 2B.1). Both of these species can occur within

coastal sage scrub and chaparral vegetation. South coast saltscale (a CNPS Rare Plant Ranking of 1B.2) is found only in coastal sage scrub habitat and singlewhorl burrobrush (a CNPS Rare Plant Ranking of 2B.2) typically occurs in chaparral. As described previously, implementation of the proposed North Park CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. The potential for sensitive plant species to occur in these areas is low due to the extent of development that has taken place within the CPU area and along the urban-canyon interface. Though focused surveys for sensitive plant species were not conducted in support of the proposed North Park CPU consistent with a program level analysis, it is anticipated that these species, if they occur, would be located within the canyon portions of the Community Plan.

As described previously, future build-out of the proposed North Park CPU and associated discretionary actions could impact a relatively small acreage of sensitive vegetation that is outside of the MHPA or designated open space that occurs along the edges of the canyons and within areas that could be subject to Brush Management Zone 1 clearing or re-development of a parcel or existing structures. These areas potentially support very small areas of native habitat (less than 0.1 acre per lot) with a low potential for sensitive plant species to occur. Thus, the implementation of the proposed North Park CPU and associated discretionary actions are not anticipated to result in impacts to sensitive plant species. Furthermore, because the area is already highly developed, it is anticipated that only small populations of sensitive plants, if any, would remain, and therefore implementation of the proposed North Park CPU and associated discretionary actions would not significantly impact any regional populations of sensitive plant species and impacts to sensitive plans resulting from build-out of the proposed North Park CPU and associated discretionary actions would be less than significant.

Issue 3 Wetlands

Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

No wetland habitats have been identified within the North Park CPU area. Thus, future development in accordance with the proposed North Park CPU and associated discretionary actions would result in less than significant impact to jurisdictional waters or wetlands.

Issue 4 Wildlife Corridors and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Within the North Park CPU area, canyons provide for local wildlife movement for birds and small mammals. However, these canyons are isolated by development and are not part of a major wildlife corridor system. Nonetheless, the canyons serve as a stepping-stone for wildlife species movement between other local canyon systems and into major off-site habitat areas. The proposed North Park CPU would designate canyon areas as open space which would provide protections from future development. The MHPA designation for canyon areas further protects canyon areas from

development. The project includes MHPA boundary line corrections to add habitat to the MHPA areas and remove developed areas from the MHPA as described below under Issue 5. These changes would increase the amount of protected open space in canyons, which would be beneficial for wildlife movement in canyon areas. Thus, no impact to wildlife corridors would occur.

Implementation of future projects consistent with the proposed North Park CPU and associated discretionary actions has the potential to result in direct impacts to migratory or nesting birds. As discussed in Chapter 2.0, Section 2.3.8.4 of this PEIR, there is low potential for occurrence of sensitive bird species. However, where future development areas contain trees or are located adjacent to trees that could serve as nesting habitat for migratory birds, there is a potential for adverse impacts to wildlife nursery sites if construction occurs during the typical bird breeding season (February 1 to September 15).

The Migratory Bird Treaty Act (MBTA), which is enforced by the USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation. Thus, there is an existing regulatory framework in place to prevent adverse impacts to migratory birds. Additionally, future discretionary development occurring within the CPU area that has the potential to impact migratory birds would be required to conduct pre-construction surveys if construction occurs during the typical bird breeding season to determine the presence or absence of breeding birds and ensure that no impacts occur to any nesting birds or their eggs, chicks, or nests. Within the North Park CPU areas, development adjacent to the MHPA would be subject to additional protections that would avoid impacts to wildlife nursery sites in adjacent habitat areas as detailed further under Issue 5 below. Thus, with the existing regulatory framework in place, potential impacts to wildlife nursery sites would be less than significant.

Issue 5 Multiple Species Conservation Program

Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan or local policy protecting biological resources, either within the MSCP plan area or in the surrounding region?

A comprehensive community-wide MHPA boundary line correction is associated with the proposed North Park CPU. The MHPA boundary line correction was considered in coordination with the Wildlife Agencies and is consistent with the goals of the MSCP to conserve biological resources and to exclude legally developed and required uses (i.e., structures, streets, brush management zone 1). As shown in Table 6.8-2, the comprehensive MHPA boundary correction for the North Park Community Plan area results in a net deletion of 6.8 acres from the MHPA. However, this correction takes into account removing 23.2 acres of disturbed and developed land from the MHPA. With regards to actual vegetation communities (coastal sage scrub and chaparral), the boundary correction results in a net addition of 9.3 acres to the MHPA, as well as 6.1 acres of disturbed land. Preservation of sensitive habitat is consistent with the goals of the MSCP, the Conservation Element for the Community Plan, and the City's ESL regulations. The MHPA correction removes existing development (i.e., structures and streets), as well as the 35-foot Brush Management Zone 1 area, as required in accordance with the City's Land Development Code, Section 142.0412.

As shown in Figure 6.8-4, a majority of the MHPA boundary line correction would remove developed and disturbed land while adding sensitive habitats, which include coastal sage scrub and chaparral; no change in grassland acreage in MHPA. City-owned lands within designated Community Plan open space areas adjacent to the existing MHPA would be added to the MHPA. Additionally, the MHPA boundary would be corrected by shifting the boundary to the rear portion of many private parcels thereby resulting in the removal of existing single-family homes and Brush Management Zone 1, while adding sensitive resources. In a few cases, sensitive habitat located within designated Community Plan open space on private land was added to the MHPA in order to expand the local wildlife corridor and increase the viability and connectivity of sensitive habitat within the existing MHPA. Regardless of the MHPA boundary line correction, these addition areas are regulated through ESL for sensitive biological resources and steep slopes. The MPHA boundary line correction does not add or increase any regulations associated with City projects, such as sewer line repairs within the canyons. These projects would continue to be conducted in accordance with the Canyon Sewer Cleaning Program (LDR No. 6020), Council Policies 400-13 and 400-14, and Community Plan policies related to this program. Correcting the MHPA boundary also does not relieve projects from having to otherwise comply with the City's MHPA Land Use Adjacency Guidelines, described below. Thus, the project would not conflict with any applicable policies or regulation applicable to the City's MSCP.

As designated in the City's MSCP Subarea Plan, the MHPA is the permanent preserve area for habitat conservation. There are no remaining lands completely within the MHPA that have not already been preserved as open space within this CPU area. All projects with sensitive biological resources would require subsequent environmental review under the City of San Diego ESL regulations.

Development adjacent to MHPA lands would be subject to the City's MHPA Land Use Adjacency Guidelines which address indirect effects on the MHPA from adjacent development. Indirect effects can occur wherever development and human activity is adjacent to natural areas. These effects include those due to increased runoff, trampling, and removal of plant cover due to hiking, biking and other human activities, increased presence of toxins, increased nighttime light levels, and redirection or blockage of wildlife movement, increased levels of non-native and invasive plants. These indirect effects could reduce the quality of the MHPA. However, the City's MHPA Land Use Adjacency Guidelines require certain measures to be incorporated in the design of projects adjacent to the MHPA to reduce indirect impacts to less than significant.

Future development proposals located adjacent to the MHPA would be required to address potential indirect impacts through compliance with the City's MHPA Land Use Adjacency Guidelines. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines. Adherence to these guidelines would avoid any future significant indirect impacts to the MHPA lands.

The City's Land Use Adjacency Guidelines of the MSCP address requirements for grading and land development: drainage; toxic substances in runoff; lighting, barriers, invasive plant species, brush management; and noise. Furthermore, proposed policies in the Conservation Element of the North Park CPU would support existing protections for MHPA lands. Thus, implementation of the proposed North Park CPU would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat

conservation plan or local policy protecting biological resources and impacts would be less than significant.

Cumulative Impacts

Preservation of the region's biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City of San Diego are managed through the adopted MSCP Subarea Plan which is incorporated by reference in the City's adopted General Plan.

As discussed above, the North Park CPU area currently support a number of sensitive resources including coastal sage scrub, chaparral, and grassland and sensitive plans and wildlife. However, these resources are located in canyon areas that are protected through the proposed open space designation and/or their location within MHPA, in addition to protections provided by the City's ESL regulations. The North Park CPU incorporates policies related to the protection of biological resources focusing primarily on the CPU's consistency with the City's ESL Regulations, the Biology Guidelines, and MSCP Subarea Plan Management Policies to protect the area's sensitive plants and animals.

Cumulative development that would occur within the North Park CPU area combined with development within surrounding communities including the Golden Hill and Uptown CPU areas would result in less than significant cumulative impacts to biological resources due to the developed nature of these communities combined with the existing regulatory framework that would ensure impacts to sensitive biological resources are avoided. Although each individual future project may contribute to incremental biological resource impacts, compliance with adopted CPU policies, the MSCP Subarea Plan, ESL Regulations, and the Biology Guidelines would ensure that cumulative impacts from future development would be less than significant.

6.8.4 Significance of Impacts

Issue 1 Sensitive Wildlife Species

Implementation of the proposed North Park CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. Thus, impacts to sensitive species would not be anticipated to occur since any sensitive species that could occur within the CPU area are likely to occupy canyon bottoms that would not be subject to development due to their designation as Open Space and/or MHPA. Additionally, any impact to sensitive vegetation communities would be subject to the City's ESL regulations, which would ensure any impacts to vegetation communities and potential sensitive species that may occupy those communities would addressed. Thus, based on the lack of sensitive species anticipated to occur in the developable areas of the CPU area in addition to the regulatory framework in place that protects sensitive species, impacts to wildlife species would be less than significant and no mitigation would be required.

Issue 2 Sensitive Habitats

Implementation of the proposed North Park CPU and associated discretionary actions has a low potential to impact any of the six sensitive plant species previously recorded in the North Park community. As described previously, implementation of the proposed North Park CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. The potential for sensitive plant species to occur within the developed areas of the CPU is low due to the extent of development that has taken place within the CPU area and along the urban- canyon interface. Impacts to sensitive plant species would be less than significant and no mitigation would be required.

Issue 3 Wetlands

No wetland habitats have been identified within the North Park CPU area. Thus, impacts to wetlands would be less than significant and no mitigation would be required.

Issue 4 Wildlife Corridors and Nursery Sites

The proposed MHPA boundary line correction would increase the amount of protected open space in canyons, which would be beneficial for wildlife movement in canyon areas. Thus, no impact to wildlife corridors would occur.

Impacts to wildlife nursery sites, particularly migratory birds, would be avoided through compliance with the MBTA in addition to compliance with protections afforded to lands within and adjacent to MHPA lands. Development on lands adjacent to MHPA lands would be required to avoid impacts to wildlife nursery sites in adjacent habitat areas as detailed further under Issue 5 below. Thus, with the existing regulatory framework in place, potential impacts to wildlife nursery sites would be less than significant.

Issue 5 Multiple Species Conservation Program

The proposed North Park CPU and associated discretionary actions would be consistent with the City's MHPA Land Use Adjacency Guidelines and Municipal Code (Section 142.0740) requirements relative to lighting adjacent to the MHPA. Additionally, in complying with the MHPA Land Use Adjacency Guidelines requirements, landscape plans for future projects would require that grading would not impact environmental sensitive land, that potential runoff would not drain into MHPA land, require that toxic materials used on a development do impact adjacency sensitive land, that development includes barriers that would reduce predation by domestic animals, that landscaping does not contain exotic plants/invasive species. In addition, the MHPA Land Use Adjacency Guidelines direct development so that any brush management activities are minimized within the MHPA and contains requirements to reduce potential noise impacts to listed avian species. Compliance with the City's MHPA Land Adjacency Guidelines and adherence to the policies in the Conservation Element of the North Park CPU would reduce potential impacts of the proposed CPU to less than significant.

Additionally, the proposed MHPA boundary line correction would be consistent with the goals of the MSCP to conserve biological resources and to exclude legally developed and required uses open space, MHPA and developed areas. Thus the proposed North Park CPU and associated discretionary actions would not result in any conflicts with the City's MSCP.

6.8.5 Mitigation Measures

All biological resources impacts would be less than significant; thus, no mitigation measures are required.

6.9 Geologic Conditions

GEOCON Inc. prepared Program EIR-level Geotechnical Report – Uptown, North Park, and Golden Hill Planning Areas (June 10, 2015; Appendix I). That analysis addresses geotechnical impacts associated with the three proposed Community Plan Updates (CPUs) including the proposed North Park CPU and associated discretionary actions. The Geotechnical Report is included in Appendix I to this draft Program Environmental Impact Report (PEIR). This section presents a summary of the findings made in the report and the associated analysis of potential impacts.

6.9.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

The North Park CPU area is generally a flat mesa incised by steep-sided canyons that drain into the Mission Valley and the San Diego Bay basin. Overall, the North Park CPU area consists primarily of developed areas consisting of residential and commercial projects. Undeveloped areas are generally located in the canyons and support coastal sage scrub, native and non-native grasslands, and chaparral.

Soil and geologic conditions are described in detail in Section 2.3.9 of this PEIR. In summary the area of the North Park CPU area is underlain by four surficial soil deposits and three geologic formations. The surficial soils include artificial fill (unmapped), topsoil/colluvium, alluvium (unmapped), and very old terrace deposits (formerly Lindavista Formation). The geologic formations include San Diego Formation, Pomerado Conglomerate, and Mission Valley Formation. Figure 6.9-1 illustrates the location of the geologic formations located within North Park.

6.9.1.1 Groundwater

Near surface groundwater (less than 20 feet deep) is unlikely in geologic formations within the North Park community. Subsurface water may be present at depth in alluvial soils deposited in canyon drainage channels.

6.9.1.2 Geologic Hazards

a. Geologic Hazard Category

Review of the 2008 City of San Diego Seismic Safety Study, Geologic Hazards and Faults, indicates the majority of the North Park CPU area is mapped as Geologic Hazard Category (GHC) 52, which is

Map Source: GEOCON

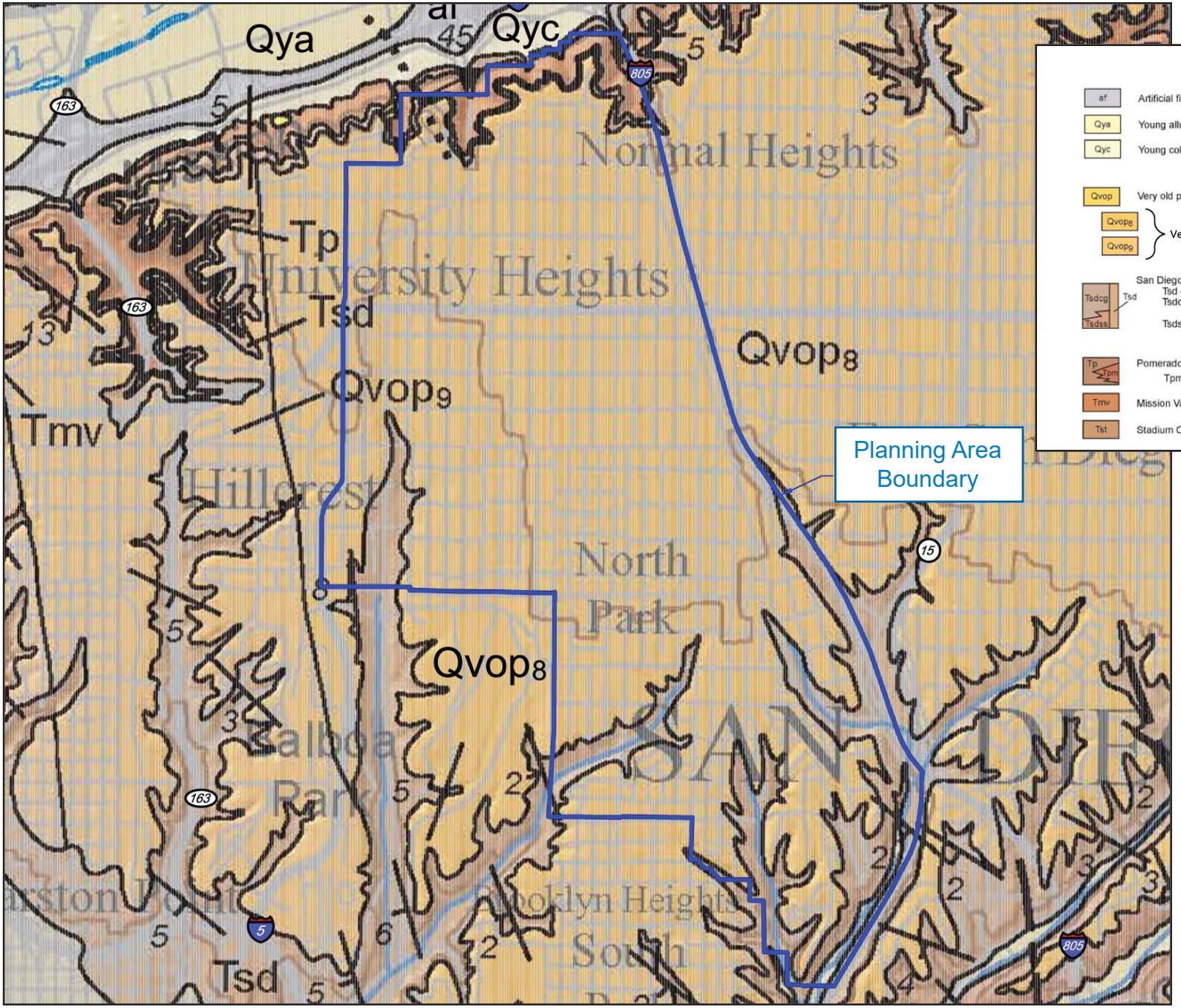


FIGURE 6.9-1
Geology
– North Park

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"other level areas, gently sloping to steep terrain, favorable geologic structure, low risk". The northern boundary of the North Park Community Plan area is designated as GHC 53, which is "level or sloping terrain, unfavorable geologic structure, low to moderate risk". A small area at the southeast corner of the North Park Community Plan area along Interstate 15 (I-15) is mapped as GHC 32, "low potential for liquefaction, fluctuating groundwater, minor drainages". Two fault buffer zones cross the CPU area. Designated GHC 12, these zones encompass faults that are considered to be potentially active, inactive, presumed inactive, or activity unknown. Figure 6.9-2 shows the North Park Community Plan boundary superimposed on the 2008 City of San Diego Seismic Safety Study Map.

b. Faulting

Review of published geologic literature indicates the North Park CPU area is traversed by two, north/south trending faults: the Florida Canyon Fault and the Texas Street Fault (see Figure 6.9-2). These faults are normal faults, it is likely that they are right-lateral, strike-slip faults related to the Rose Canyon Fault Zone.

The nearest known active fault is the Rose Canyon Fault Zone, which is identified in the GEOCON report as separate from the Newport–Inglewood/Rose Canyon Connected Fault (Table 6.9-1). Both are located approximately two miles to the west of the North Park CPU area. Major earthquakes occurring on the Rose Canyon Fault Zone, or other regional active faults located in the southern California area, could subject the affected area to moderate to severe ground shaking.

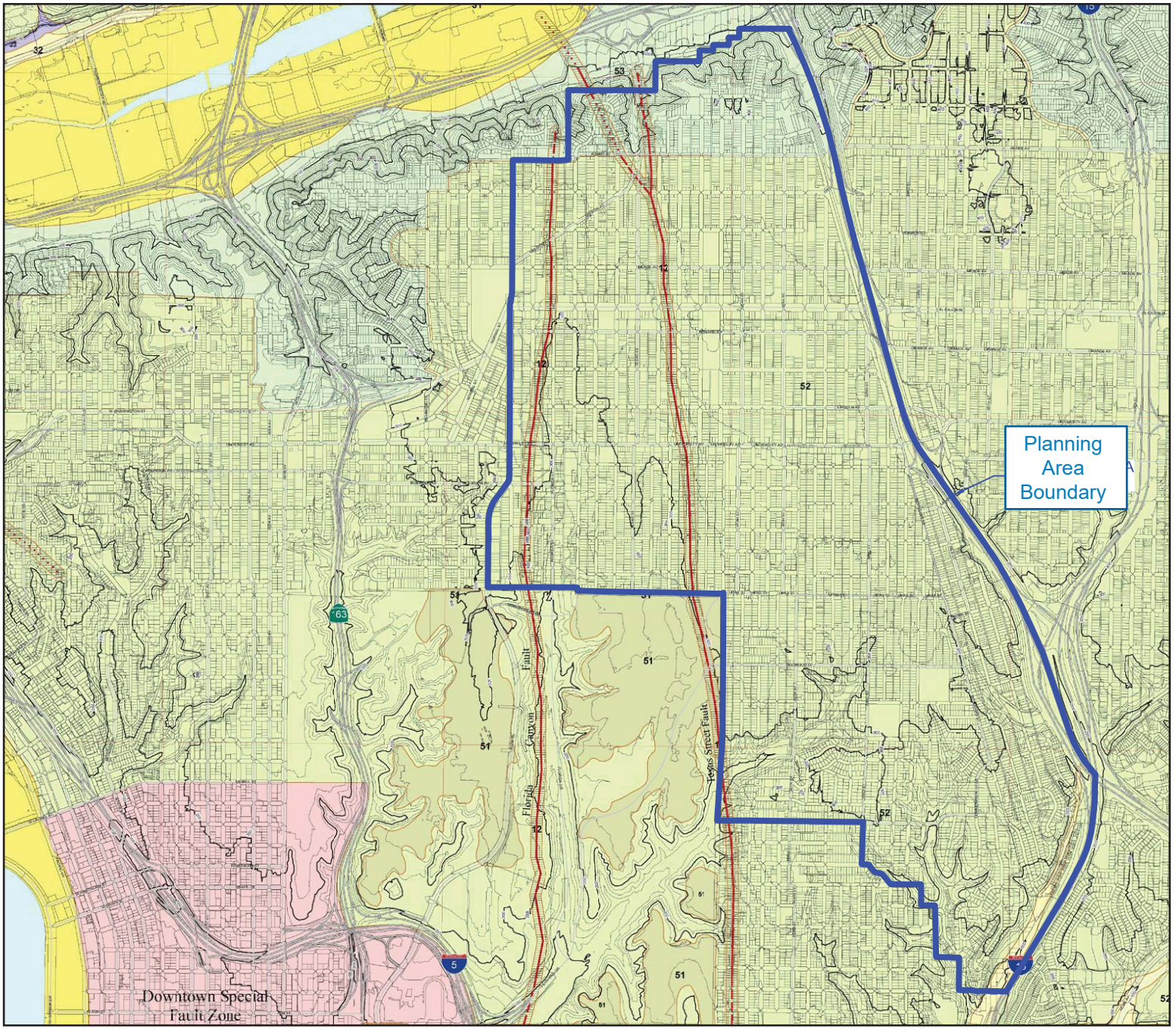
Seismic hazard reduction with respect to faulting and seismicity is typically attained by building set-backs from active faults and proper implementation of existing building codes. Recommendations specific to future development would occur as part of site-specific geotechnical investigations, if required during City staff review.

c. Seismicity

The North Park CPU area will be subjected to hazards caused by ground shaking during seismic events on regional active faults. According to the computer program EZ-FRISK (Version 7.62), six known active faults are located within a search radius of 50 miles from the North Park CPU area. The nearest known active faults are the Newport–Inglewood/Rose Canyon Connected Fault and Rose Canyon Fault (see Table 6.9-1), located approximately two miles west of the site and is the dominant source of potential ground motion. Table 6.9-1 lists the estimated maximum earthquake magnitude and peak ground acceleration for faults in relationship to the Community Plan area.

As part of the geotechnical update, it was determined that the North Park CPU area could be subject to moderate to severe ground shaking in the event of an earthquake along any of the faults listed in Table 6.9-1 or other faults in the Southern California/Northern Baja California region.

Map Source: GEOCON



LEGEND

Geologic Hazard Categories

FAULT ZONES

- 11 Active, Alquist-Priolo Earthquake Fault Zone
- 12 Potentially Active, Inactive, Presumed Inactive, or Activity Unknown
- 13 Downtown special fault zone

LIQUEFACTION

- 31 High Potential -- shallow groundwater major drainages, hydraulic fills
- 32 Low Potential -- fluctuating groundwater minor drainages

OTHER TERRAIN

- 51 Level mesas -- underlain by terrace deposits and bedrock nominal risk
- 52 Other level areas, gently sloping to steep terrain, favorable geologic structure, Low risk
- 53 Level or sloping terrain, unfavorable geologic structure, Low to moderate risk
- 54 Steeply sloping terrain, unfavorable or fault controlled geologic structure, Moderate risk
- 55 Modified terrain (graded sites) Nominal risk

Water (Bays and Lakes)

FAULTS

- Fault
- Inferred Fault
- Concealed Fault
- Shear Zone

0 Feet 3,000

FIGURE 6.9-2
City of San Diego
Geologic Hazards
and Faults
– North Park

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Table 6.9-1
Deterministic Seismic Hazard Parameters – North Park

Fault Name	Distance from Site (miles)	Maximum Earthquake Magnitude (Mw)	Peak Ground Acceleration		
			Boore-Atkinson 2008 (g)	Campbell-Bozorgnia 2008 (g)	Chiou-Youngs 2008 (g)
Newport-Inglewood/Rose Canyon Connected	2	7.5	0.40	0.37	0.48
Rose Canyon	2	6.9	0.36	0.36	0.43
Coronado Bank	15	7.4	0.22	0.16	0.20
Palos Verde/Coronado Bank Connected	15	7.7	0.24	0.17	0.23
Elsinore	39	7.85	0.15	0.10	0.12
Earthquake Valley	43	6.8	0.09	0.06	0.04

The computer program EZ-FRISK was used to perform a probabilistic seismic hazard analysis, which assumes that the occurrence rate of earthquakes on each mapped Quaternary fault is proportional to the faults slip rate. The program accounts for earthquake magnitude as a function of fault length, and site acceleration estimates are made using the earthquake magnitude and distance from the site to the rupture zone. The program also accounts for uncertainty in each of following: (1) earthquake magnitude, (2) rupture length for a given magnitude, (3) location of the rupture zone, (4) maximum possible magnitude of a given earthquake, and (5) acceleration at the site from a given earthquake along each fault. By calculating the expected accelerations from considered earthquake sources, the program calculates the total average annual expected number of occurrences of site acceleration greater than a specified value.

Table 6.9-2 presents the site-specific probabilistic seismic hazard parameters including acceleration-attenuation relationships and the probability of exceedance.

Table 6.9-2
Probabilistic Seismic Hazard Parameters – North Park

Probability of Exceedance	Peak Ground Acceleration		
	Boore-Atkinson 2008 (g)	Campbell-Bozorgnia 2008 (g)	Chiou-Youngs 2008 (g)
2% in a 50-Year Period	0.52	0.47	0.55
5% in a 50-Year Period	0.36	0.33	0.37
10% in a 50-Year Period	0.26	0.23	0.25

While listing peak accelerations is useful for comparison of potential effects of fault activity in a region, other considerations are important in seismic design, including frequency and duration of motion and soil conditions underlying the site.

d. Liquefaction Potential

Liquefaction or seismically induced settlement typically occurs when a site is located in a zone with seismic activity, on-site soils are relatively cohesionless with relative densities less than about 70 percent, and groundwater within 50 feet of the surface. If these criteria are met, a seismic event could result in soil liquefaction. One area of potentially liquefiable soils has been identified on the City of San Diego Hazard Map at the southeast corner of the North Park CPU area along the west side of I-15 (see Figure 6.9-2). The area is identified as Hazard Map Symbol 32, Low Potential – fluctuating groundwater, minor drainages. Impacts related to liquefaction include ground failure, settlement, or lateral spreading. The potential for liquefaction and seismically induced settlement occurring for the North Park CPU area is low across the majority of the area due to the very dense cemented condition of the geologic formations and lack of groundwater.

e. Tsunamis and Seiches

The site is not located near the ocean or downstream of any large bodies of water. Therefore, the risk associated with inundation by tsunamis or seiches is low.

f. Subsidence

Based on the subsurface soil conditions encountered during the field investigation and the lack of groundwater extraction, the risk associated with ground subsidence hazard is low.

g. Non-Conforming Slopes

Areas of known and potential, non-conforming slopes (i.e., slopes steeper than 2:1 horizontal to vertical) are shown on Figure 6.9-3. These areas are generally located at the north end of the community along the Interstate 8 and in the southeast corner of the North Park CPU area.

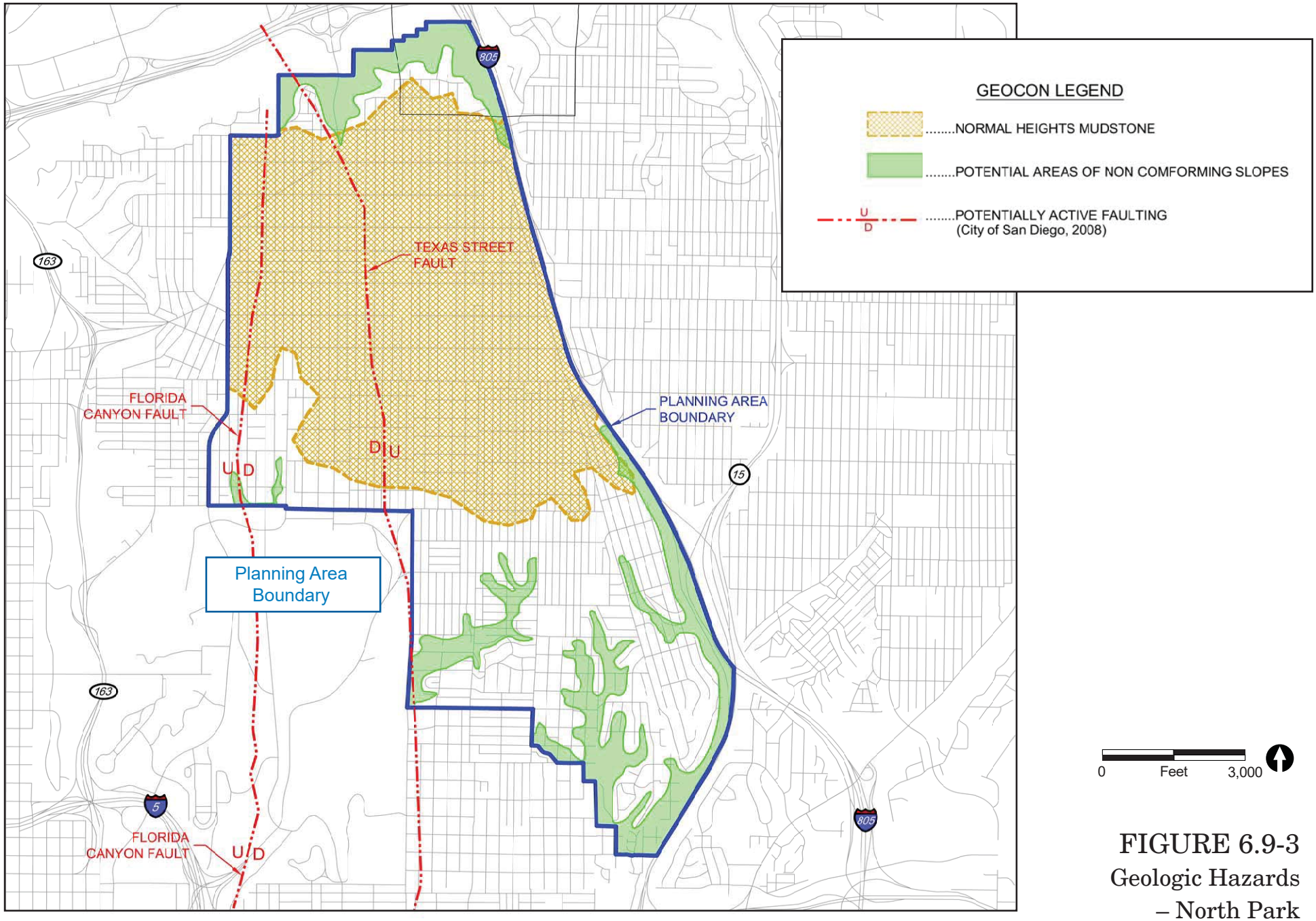
h. Landslides

No large landslides are mapped within the North Park CPU area; however, small surficial instability could be present on steep drainage slopes. Areas of known and potential, over-steepened, natural and constructed slopes, where surficial instability could occur, are shown on Figure 6.9-3 as potential areas of non-conforming slopes.

i. Flooding

Based on review of the FEMA's Flood Insurance Rate Map (FIRM), with the exception of the drainage area along I-15, the planning area is not located within areas likely to flood. While flooding could occur within the drainage area near I-15, these areas are located in canyon bottoms and potential development would occur at the canyon tops and mesas. The risk associated with flooding hazard is low.

Map Source: GEOCON



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FIGURE 6.9-3
Geologic Hazards
– North Park

j. Expansive Soil

The Normal Heights Mudstone (Reed 1991) is mapped over much of the northern half of the North Park CPU area (Figure 6.9-3). Geotechnical tests indicate the mudstone can be highly expansive. The mudstone could range from a few feet thick to approximately 10 feet thick, or greater, in localized areas. The presence of highly expansive materials, especially if near finish proposed grade, is potentially damaging to foundations surface improvements such as sidewalks and pavements. Development within areas of highly expansive materials would be subject to special measures during design and construction to mitigate the effects of expansive soil.

6.9.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. For impacts related to geologic conditions, a significant impact could occur if implementation of the proposed CPU would:

1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault,
    - Strong seismic ground shaking,
    - Seismic-related ground failure, including liquefaction,
    - Landslides;

2) Result in substantial soil erosion or the loss of topsoil;

3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;

4) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or

This section does not include analysis related to the capacity of soils to support septic tanks or alternative waste water disposal systems since sewers are available throughout the North Park CPU area.

6.9.3 Impact Analysis

Issue 1 Seismic Hazards

Would the proposed project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?

No development is proposed as part of the proposed North Park CPU and associated discretionary actions. However, future development associated with the implementation of the proposed North Park CPU and associated discretionary actions could result in the exposure of more people, structures, and infrastructure to seismic hazards.

As presented in Section 6.9.1, the North Park CPU area is traversed by two, north/south trending faults: the Florida Canyon Fault and the Texas Street Fault (see Figure 6.9-3.). The City of San Diego Seismic Safety Study, Geologic Hazards and Faults (2008) Grid Tile 17 describes the faults as "potentially active, inactive, presumed inactive, or activity unknown." A geotechnical investigation report that specifically addresses surface fault-rupture hazard is required for proposed projects located in the fault buffer zones. San Diego Municipal Code (SDMC) Section 145.1803(a)(2) indicates that no building permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards. Therefore, impacts related to surface fault rupture hazards would be considered less than significant for the proposed North Park CPU and associated discretionary actions.

Severe ground shaking is most likely to occur during an earthquake on one of the regional active faults in the area. The Newport-Inglewood/Rose Canyon Connected faults, located to the northwest, is the active fault considered having the most significant effect from a design standpoint due to the close proximity. Based on a deterministic analysis, a maximum credible earthquake of moment magnitude M7.5 on the Newport-Inglewood/Rose Canyon Connected fault could produce an estimated peak horizontal ground acceleration of 0.48 g within the proposed North Park CPU area. Based on this analysis, damage from earthquake ground shaking could occur. Structural design in accordance with the current Building Code is intended to reduce the impact of earthquake shaking on buildings to an acceptable level of risk. Seismic design of future structures would be evaluated in accordance with the 2013 California Building Code (CBC) guidelines or those currently adopted by the City of San Diego. Design in accordance with the CBC would reduce potentially significant impacts to future structures from strong seismic ground shaking to a less than significant level.

All new development and redevelopment would be required to comply with the SDMC and the CBC, which include design criteria for seismic loading and other geologic hazards and require that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category (SDMC Section 145.1803). Additionally, the potential for liquefaction and seismically induced settlement occurring for the mesa top areas is very low due to the very dense cemented condition of the geologic formations and lack of groundwater. A small area along the southeast part of the North Park CPU area has a low risk of soil liquefaction and seismically induced settlement. Building construction in accordance with the SDMC and CBC will reduce this potential hazard to an

acceptable level of risk. Thus, while the North Park CPU area would be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure, liquefaction, or landslides would be reduced to a less than significant level through implementation of site specific geotechnical report recommendations associated with future development within the North Park CPU area.

Issue 2 Erosion or Loss of Topsoil

Would the project result in a substantial erosion or loss of topsoil?

The North Park CPU area consists primarily of developed and previously graded land. Undeveloped land occurs in canyons and other open space areas. Implementation of the proposed North Park CPU and associated discretionary actions would allow for the intensification of some land uses that could lead to construction and grading activities that could temporarily expose topsoil and increase soil erosion from water and wind. Development of parcels within the proposed North Park CPU area could remove the existing pavement and cover, thereby exposing soils to erosion during construction if protective measures are not taken.

SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibits sediment and pollutants from leaving the work site and requires the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls shall include measures outlined in Chapter 14, Article 2, Division 2 Storm Water Runoff Control and Drainage Regulations that address the development's potential erosion and sedimentation impacts.

Conformance to these mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that cause soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, would be subject to National Pollutant Discharge Elimination System General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan that would consider the full range of erosion control Best Management Practices, including any additional site-specific and seasonal conditions. Project compliance with National Pollutant Discharge Elimination System requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development. Impacts would be less than significant.

Issue 3 Geologic Instability

Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The majority of the North Park CPU area is mapped as Geologic Hazard Category 52, characterized as low risk with favorable geologic structure. Other, smaller hazard categories are mapped within

the CPU area with low to moderate risk. Refer to Figure 6.9-2 for the location of these Hazard Categories.

No large landslides are mapped in the North Park CPU area; however, surficial instability could be present on steep slopes. Future projects built in accordance with the proposed North Park CPU and associated discretionary actions would be required to prepare a geotechnical investigation that specifically addresses slope stability if located on landslide-prone formations or slopes steeper that 25 percent (slope ratio of 4:1 horizontal to vertical) (SDMC Table 145.1803). Potential hazards associated with slope instability would be addressed by the site-specific recommendations contained within geotechnical investigations as required by the CBC and SDMC. Thus, impacts related to landslide and slope instability would be less than significant.

A small area along the southeast part of the North Park CPU has a low risk of soil liquefaction and seismically induced settlement (see Figure 6.9-2). The area is identified as Hazard Map Symbol 32, low potential – fluctuating groundwater, minor drainages. Impacts related to liquefaction include ground failure, settlement, or lateral spreading. The potential for liquefaction and seismically induced settlement occurring within the North Park CPU area is low across the majority of the area due to the very dense cemented condition of the geologic formations and lack of groundwater. Similarly, geologic hazards associated with risk of collapse would be low based on the dense underlying geologic formations. Based on the subsurface soil conditions and the lack of groundwater extraction occurring within the CPU area, the risk associated with ground subsidence hazards is low. Future development within the North Park CPU area would be subject to requirements of the CBC and SDMC, which include preparation of a site-specific geotechnical investigation and implementation of any geotechnical recommendations to ensure geologic instability hazards are avoided. Thus, with compliance with the CBC and SDMC, geologic instability impacts associated with future development within the North Park CPU area would be less than significant.

Issue 4 Expansive Soils

Relative to soil expansion, the highly expansive Normal Heights Mudstone is mapped over much of the northern half of the North Park CPU area. The presence of highly expansive materials during construction, especially if near proposed grade, is potentially damaging to building foundations and surface improvements such as sidewalks and pavements. Site-specific measures based on results of a Geotechnical Investigation would be necessary during design and construction of future projects to remedy the effects of expansive soil. A site-specific Geotechnical Investigation required for future projects within the CPU area would be required to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure potential hazards associated with expansive soils are minimized. Thus, with implementation of the recommendations included in site-specific geotechnical investigations required under the CBC and SDMC, potential impacts associated with expansive soils would be less than significant.

Cumulative Impact Analysis

Cumulative impacts related to geologic hazards within the North Park CPU area and surrounding CPU areas such as Golden Hill and Uptown would be less than significant with implementation of

the regulatory framework discussed in the previous analysis. Geologic hazards occur from mapped faulting and site-specific soil or geologic conditions. Development of the North Park CPU in combination with surrounding CPU areas would not compound to worsen potential geologic hazards. Geologic hazard conditions are site-specific and do not compound or increase in combination with projected development elsewhere in the county. Thus, as each individual development would be required to comply with remedial measures identified in a site-specific geotechnical investigation, as required by the SDMC and CBC, cumulative impacts related to geologic hazards would be less than significant.

6.9.4 Significance of Impacts

Based on the Geotechnical Report prepared by GEOCON, Inc., the proposed North Park CPU and associated discretionary actions would not have direct or indirect significant environmental impacts with respect to geologic hazards, because future development would be required to occur in accordance with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geologic investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Adherence to the SDMC grading regulations and construction requirements and implementation of the recommendations and standards of the City's Geotechnical Study Requirements would preclude significant impacts related to erosion or loss of topsoil. Thus, impacts would be less than significant and no mitigation is required.

6.9.5 Mitigation Measures

Impacts of build-out of the proposed North Park CPU and associated discretionary actions related to geologic conditions would be less than significant with implementation of existing SDMC requirements for preparation of geotechnical investigations prior to grading and construction and implementation of applicable measures identified in project specific geotechnical investigations. Thus, no mitigation is required.

6.10 Paleontological Resources

The analysis presented in this section evaluates the potential for impacts to paleontological resources based on existing geologic formations that underlay the North Park Community Plan Update (CPU) area. Refer to Section 6.9, for a discussion of the geologic formations that could be affected by the project (Figure 6.9-1). The following analysis is based on a review of available literature, including the City's General Plan, Kennedy maps, the City's Paleontological Guidelines, and the publication of Paleontological Resources, County of San Diego by Deméré and Walsh (1994).

6.10.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. As described in the Chapter 2.0, Environmental Setting (Section 2.3.9 Geology and Paleontology) of this draft Program Environmental Impact Report (PEIR), the North Park CPU area is underlain by the San Diego and Mission Valley Formations, which are each assigned high resource sensitivity. Refer to Section 2.3.10 for additional discussion of the existing setting for paleontological resources and sensitivity ratings.

6.10.2 Significance Determination Thresholds

The City of San Diego's California Environmental Quality Act (CEQA) Significance Thresholds provides guidance to determine potential significance to paleontological resources. Based on the City's Thresholds, a significant impact related to paleontological resources would occur if the proposed CPU and associated discretionary actions would:

1) Result in development that requires:
   - over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or
   - over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City's CEQA Significance Thresholds includes a Paleontological Determination Matrix to support the City's significance thresholds that is included in Section 2.3.10 of this PEIR. Additionally, the significance thresholds provide the following additional guidance for determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
- If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

6.10.3 Impact Analysis

Issue 1 Paleontological Resources

Would the project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, activities that excavate or grade geologic formations that could contain fossil resources would be significant. The proposed North Park CPU area is underlain by the San Diego and Mission Valley Formations, which are considered to have a high potential for containing fossil resources. The North Park CPU area is not underlain by any moderate resource potential formations. Therefore, no impacts relative to moderate resource potential formations would occur.

Grading associated with future development projects implemented in accordance with the North Park CPU and associated discretionary actions that involve excavation into the underlying geological formations could expose these formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a potentially significant impact. Thus, impacts resulting from future development into the high sensitivity San Diego and Mission Valley Formations would be potentially significant (Impact 6.10).

Build-out of future ministerial projects implemented in accordance with the proposed North Park CPU would likely result in a certain amount of disturbance to the native bedrock within the CPU area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with build-out of the proposed North Park CPU would be potentially significant (Impact 6.11)

Impact 6.10: Grading activities associated with the future discretionary projects that require grading in excess of 1,000 cubic yards, extending to a depth of ten feet or greater, into high sensitivity formations could result in significant impacts to paleontological resources.

Impact 6.11: Grading activities associated with the future ministerial projects that require grading in excess of 1,000 cubic yards, extending to a depth of ten feet or greater into high sensitivity formations, could result in significant impacts to paleontological resources.

Cumulative Impacts

Development allowed pursuant to the proposed North Park CPU and development within surrounding CPUs could involve excavation of previously undeveloped areas, some of which may

consist of unique paleontological resources with fossil-bearing potential. Potential cumulative impacts to paleontological resources were evaluated in the General Plan PEIR. The analysis concluded that there is potential for the cumulative loss of paleontological resources throughout the county as the county continues to develop in response to projected population growth. Likewise, development of the North Park CPU area may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Certification of the General Plan PEIR included the adoption of mitigation measures that attempt to reduce significant project-level impacts from future development. However, as discussed above, there is only a mechanism to apply the mitigation framework to discretionary projects, not ministerial projects. Thus, within the North Park CPU area and surrounding communities, significant impacts to paleontological resources could occur associated with grading for ministerial projects. Similar to the General Plan PEIR, build-out of ministerial projects within the North Park CPU area would result in significant cumulative impacts to paleontological resources (Impact 6.11).

6.10.4 Significance of Impacts

Because of high sensitivity for paleontological resources within the San Diego and Mission Valley Formations, grading into these formations could potentially destroy fossil resources. Therefore, implementation of future discretionary and ministerial projects within the proposed North Park CPU area within these formations has the potential to result in significant impacts to paleontological resources.

6.10.5 Mitigation Measures

In order to reduce the potential adverse impact to paleontological resources associated with discretionary projects, the project would incorporate the mitigation measure identified in the General Plan PEIR addressing paleontological resource impacts.

The following measure would apply to any discretionary project that proposes subsurface disturbance within a high sensitivity formation. If no subsurface disturbance is planned, then paleontological resources would not be impacted and development of a project-specific paleontological monitoring and discovery treatment plan would not be necessary. The following mitigation measure would reduce impact 6.10 to a less than significant level.

PALEO 6.10: Prior to the approval of subsequent discretionary development projects implemented in accordance with the proposed North Park CPU, the City shall determine the potential for impacts to paleontological resources within a high sensitivity formation based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review.

I. Prior to Project Approval

A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable United States Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resources potential geologic deposit/formation/rock unit.
- Require over 2,000 cubic yards of excavation and/or 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.
- Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.

- Monitoring is always required when grading on a fossil recovery site or a known fossil location.
- Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).
- Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded, and/or unweathered geologic deposits/formations/rock units are present at the surface.
- Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological Mitigation Monitoring and Report Program shall be implemented during construction grading activities.

6.10.6 Significance after Mitigation

All future discretionary projects that would occur as a result of the proposed North Park CPU and associated discretionary actions would be required to comply with mitigation measure PALEO 6.10. Implementation of mitigation measure PALEO 6.10 would reduce paleontological impacts associated with future discretionary development to below a level of significance.

Build-out of future ministerial projects proposed in conformance with the proposed North Park CPU and associated discretionary actions would also likely result in a certain amount of disturbance to the native bedrock within the study area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with build-out of the proposed North Park CPU and associated discretionary actions would remain significant and unavoidable.

6.11 Hydrology/Water Quality

This section addresses the potential hydrology and surface and groundwater quality impacts that would result from the project. It relies on secondary source information and policies contained within the proposed North Park Community Plan Update (CPU). This section also details applicable regulations, receiving waters, flood hazards, and other relevant existing conditions within the study area.

6.11.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. Additional detail regarding conditions specific to the North Park CPU are discussed further below.

6.11.1.1 Drainage

The North Park community is located on a mesa top incised with a complex network of canyons. Drainage occurs in two directions. The northern portion of the community drains through the canyons and storm drains to the San Diego River, located within Mission Valley to the north, and ultimately to the Pacific Ocean. The southern portion of the community drains via the canyon systems, creeks, and storm drains to San Diego Bay.

The portion of the North Park CPU area draining to the San Diego River is located in the San Diego River Watershed, Lower San Diego Hydrologic Area (HA) 907.10, within the Mission San Diego Hydrologic Subarea (HSA) 907.11. The portion of North Park CPU area draining to San Diego Bay is in the Pueblo San Diego Watershed, San Diego Mesa Hydrologic Area (HA) 908.20. This area is divided into two Hydrologic Subareas, The most westerly portion is in the Lindbergh Hydrologic Subarea (HSA) "908.21," and the remainder is in the Chollas Hydrologic Subarea (HSA) "908.22. Figure 6.11-1 shows the location of HA 907.10 and HA 908.20. With a land area of approximately 440 square miles, the San Diego River watershed is the second largest hydrologic unit in San Diego County. The watershed contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee and several unincorporated areas. Approximately 58.4 percent of the San Diego River watershed is currently undeveloped. Important hydrologic resources in the watershed include five water storage reservoirs, a large groundwater aquifer, extensive riparian habitat, coastal wetlands, and tide pools. The southern portion of the North Park community is located within the Pueblo San Diego Hydrologic Unit 908.00. The Pueblo San Diego watershed is the smallest hydrologic unit in San Diego County, encompassing approximately 60 square miles of predominantly urban landscape in the cities of San Diego, La Mesa, Lemon Grove, and National City. The watershed contains the smallest proportion of unincorporated area (0.3 percent) of the hydrologic units within the county. The Pueblo San Diego watershed is the County's most densely populated watershed with approximately

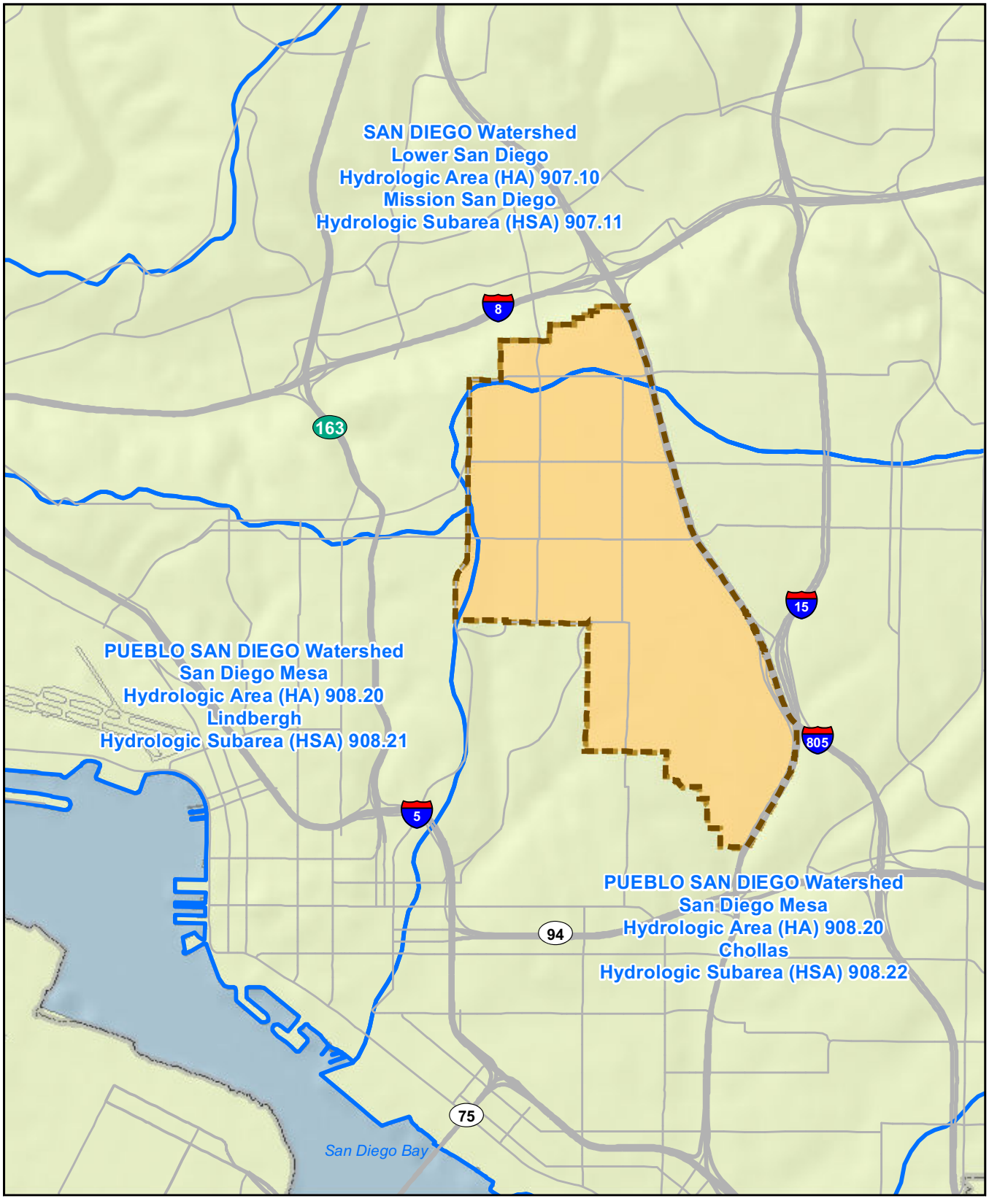


FIGURE 6.11-1

Watersheds – North Park

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75 percent of the watershed developed. Due to the high level of existing urbanization in the watershed, only small amounts of additional land is projected for development over the next 15 years (Project Clean Water 2016; www.projectcleanwater.org).

6.11.1.2 Water Quality

The northern portion of the North Park CPU area drains to the San Diego River, and the southern portion (the majority of the North Park CPU area) drains to San Diego Bay.

a. San Diego River Watershed and San Diego River

The San Diego River generally flows to the west from the North Park CPU area and discharges into the Pacific Ocean just north of the Ocean Beach community. Beneficial uses for the Lower San Diego River include agricultural supply, industrial service supply, water recreation, and biological habitats.

The San Diego River has been listed as an "impaired" body under Section 303 (d) of the Clean Water Act due to fecal coliform, low dissolved oxygen, phosphorus, total dissolved solids (TDS), and toxicity. Major impacts to this watershed include surface water quality degradation, habitat degradation and loss, sediment, invasive species, eutrophication, and flooding. Sources of impacts include urban runoff, agricultural runoff, mining operations, sewage spills, and sand mining.

b. Pueblo San Diego Watershed and San Diego Bay

The majority of the North Park CPU area drains to San Diego Bay. The beneficial uses of the inland surface waters in the Pueblo San Diego watershed are limited to contact recreation (potential use activities involving a significant risk if ingestion of water, including wading by children and swimming) and non-contact recreation (aquatic recreation pursuits not involving a significant risk of water ingestion, including fishing and limited body contact incidental to shoreline activity), warm freshwater habitat, and wildlife habitat. The San Diego Bay receiving water supports an extensive array of beneficial uses (EPA 2012).

The existing coastal beneficial uses identified for San Diego Bay include industrial service supply, navigation, contact water recreation, non-contact water recreation, commercial and sport fishing, preservation of biological habitats of special significance, estuarine habitat, wildlife habitat, rare, threatened, or endangered species, marine habitat, migration of aquatic organisms, spawning, reproduction, and/or early development, and shellfish harvesting (RWQCB 1994).

The watershed drainage consists of a group of relatively small local creeks and pipe conveyances, many of which are concrete-lined and drain directly into San Diego Bay. The creeks in the watershed are highly impacted by urban runoff, and Chollas Creek and the mouth of the creek in San Diego Bay are listed as 303(d)-impaired water bodies for various trace metals parameters and aquatic toxicity. Several sites in San Diego Bay that are impacted by runoff from the Pueblo San Diego watershed have been identified as hot spots by California's Bay Protection Toxic Cleanup Program.

Impairments from multiple pollutants have led to establishment of Chollas Creek total maximum daily loads (TMDLs). Five TMDLs have been adopted for Chollas Creek: the pesticide (diazinon) TMDL (with a final compliance date of December 31, 2010), the dissolved metals TMDLs (for copper, lead and zinc), and an indicator bacteria TMDL. Multiple agencies, including the City of San Diego, the Cities of La Mesa and Lemon Grove, the County of San Diego, the San Diego Unified Port District, Caltrans, and the U.S. Navy, were among those identified as having responsibility in reducing pollutants to mandated levels. The indicator bacteria TMDL is being re- evaluated based upon new scientific data. Implementation Plans are designed to meet the requirements of the metals and bacteria TMDLs over a 20-year period, with phased incremental reductions required. Implementation Plans use an integrated approach to meet these requirements. Both structural and non-structural best management practices (BMPs) are being implemented to achieve waste load reductions.

6.11.1.3 Groundwater

Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use, as it was determined by the 1989 Regional Water Quality Control Board's Resolution No. 89-33 that this area had been previously determined to not support municipal and domestic supply. Groundwater within Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply (RWQCB, 1994 as amended).

6.11.1.4 Urban Runoff Management

Urban runoff is surface water runoff generated from developed or disturbed land associated with urbanization. The increase in impervious surfaces and fewer opportunities for infiltration within the landscape increase storm flows and provide a source for sediment and other pollutants to enter receiving waters. Urban runoff is a major component of urban flooding and is a particular problem for management of watersheds. Urban runoff is the largest pollution source of Southern California's coastal beaches and near-shore waters. Urban runoff control programs typically focus on managing the effect that new impervious surfaces have on stream channels, but may also provide remediation of existing problems.

6.11.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed North Park CPU and associated discretionary actions, a significant hydrology/water quality impact would occur if implementation of the proposed North Park CPU and associated discretionary actions would:

1) Result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff;

2) Result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or

3) Deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge.

6.11.3 Impact Analysis

Issue 1 Flooding and Drainage Patterns

Would the project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?

The North Park community is an urban community within the City, and the majority of the North Park CPU area is developed. Large areas of impervious surfaces (buildings, roadways and surface parking) are mixed with a smaller amount of pervious (landscaping, parks) areas.

Future projects that could occur within the North Park CPU area would result in an increase in impervious areas due to the new buildings, hardscape, and parking areas. Landscaping, as well as pervious pavements used in lieu of standard pavement, diminish a project's increase in impervious areas and therefore, diminish a project's increase in urban pollutants. Implementation of the CPU would also have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could result in flooding and/or erosion.

Future projects would be required to comply with the NPDES and Hydromodification Management Plan (HMP) requirements as described in the City of San Diego Stormwater Standards Manual. Storm water detention and HMP facilities would be implemented to accommodate the potential increase in storm water runoff rates due to the proposed increase in impervious areas. To fulfill the HMP requirements, projects would need to be designed so that runoff rates and durations are controlled to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. Projects would typically manage the increase in runoff by implementing a series of storm water BMPs and detention facilities that have been specifically designed for Hydromodification Management.

With implementation of the regulatory framework~~d~~ in place addressing pre and post-development run-off rates, implementation of the CPU would not result in an increase in flooding. Additionally, based on a review of FEMA's Flood Insurance Rate Maps (FIRM), the planning area is not subject to flooding hazards. While flooding could occur within canyon bottoms, there is no potential development in these locations and people would not be subject to flooding hazards. Additionally, due to the distance and elevation of the planning area in relation to the ocean, the risk of flooding from a tsunami is low. Risk of flooding from a seiche is low as there are no large water bodies in the area.

While the proposed North Park CPU and associated discretionary actions would allow for increased density, the permitted changes in land use would largely occur in infill areas and as redevelopment of existing developed sites. The community has a sizable amount of pervious land, largely in open space canyons and park lands, which is not available for urban development. potential to improve drainage characteristics of existing sites through compliance with current municipal storm water

requirements including implementation of LID practices that retain a portion of storm water on-site for infiltration, reuse, or evaporation.

The proposed North Park CPU Elements include policies that address hydrology and water quality. The Sustainability and Conservation Element of the proposed North CPU contains a goal related to the improvement of the hydrology and drainage within the proposed CPU area – specifically the application of sustainable urban runoff management techniques applied to support the surrounding landscape and reduce impacts on the surrounding canyons. Other proposed conservation Element policies address urban runoff management and maintenance and cleaning of canyons.

All development in the City is subject to drainage regulations through the SDMC, which require that the existing flows of a property proposed for development be maintained to ensure that the existing structures and systems handling the flows are sufficient. Since future development would be required to adhere to existing drainage regulations, development would not result in alterations to existing drainage patterns in a manner that would result in flooding or erosion on- or off-site. Adherence to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which require installation of LID practices such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, would improve surface drainage conditions or, at a minimum, not exacerbate flooding or cause erosion. Furthermore, future development would be required to comply with NPDES permit requirements which would result in a reduction in the volume and rate of surface runoff compared to the existing condition. The quantity of runoff reduction would depend on the actual design of open space, pervious areas, run-off retention, and the manner of implementation of these low-impact development practices. Thus, impacts would be less than significant.

Issue 2 Water Quality

Would the project result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

Future development projects that could occur in the North Park community under the proposed North Park CPU and associated discretionary actions would have the potential to change pollutant discharges. Applicable NPDES permit requirements require the retention and/or treatment of storm water through the implementation of Best Management Practices (BMPs). Future development would be required to demonstrate how pollutants such as various trace metals (e.g., copper, lead, zinc, and mercury), fecal coliform, low dissolved oxygen, phosphorus, and TDS that could be associated with future development, would treated to prevent discharge into receiving waters. Much of the existing development in the area was constructed before current storm water regulations were adopted. Thus, future development and redevelopment would be subject to current, more stringent requirements, that would likely improve water quality.

Under current storm water regulations in the City, all projects requiring approvals are subject to certain minimum storm water requirements to protect water quality. Types of storm water BMPs required for new developments include site design, source control, and treatment control practices, many of which overlap with LID practices. Storm water BMPs would reduce the amount of pollutants transported from a future proposed development project to receiving waters.

Runoff related to roadway variables, including truck traffic, curbs, barriers, grass shoulders, landscaping; traffic characteristics such as speed and braking; vehicle characteristics such as age and maintenance; roadway composition and maintenance practices; and issues such as littering also affect pollutant concentrations. The City requires implementation of storm water BMPs for streets that would reduce the flow of pollutant concentrations to receiving waters. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. Adherence to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual, for design of new development and infrastructure under the proposed North Park CPU and associated discretionary actions, would maintain or possibly improve water quality conditions. Impacts would be less than significant and no mitigation is required.

Issue 3 Groundwater

Would the project deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge?

Based on the Water Quality Control Plan for the San Diego Basin (April 2011), most of the ground waters in the region have been extensively developed; the availability of potential future uses of ground water resources is limited. Further development of ground water resources would probably necessitate ground water recharge programs to maintain adequate ground water table elevations. Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use, as it was determined by the 1989 Regional Water Quality Control Board's Resolution No. 89-33 that this area does not support municipal and domestic supply. Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply.

As discussed under Issues 1 and 2 above, current storm water regulations encourage infiltration of storm water runoff and protection of water quality which would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in a less than significant impact on groundwater supply and quality.

Cumulative Impacts

Future projects within the North Park CPU area and surrounding areas including projects within the Golden Hill and Uptown CPUs, could have a cumulative impact on hydrology and water quality, including downstream problems with flooding, sizing of drainage facilities, erosion, and sedimentation.

However, all future development within the CPU areas would be required to comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more or a Water Quality Control Plan if the disturbed area is less than one acre. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment.

Pursuant to the City's Storm Water Standards, future development would be required to implement construction, post-construction, and permanent BMPs in addition to hydromodification management, to minimize water quality impacts both during the construction and operation phases. Future development projects could be required to enter into a Storm Water Management and Discharge Control Maintenance Agreement with the City to ensure the maintenance of the permanent BMPs. Future development would also be required to implement these mandated water quality protection measures and, through adherence to the City's NPDES permit~~, Standard Urban Stormwater Management Plan,~~ and the City's Storm W~~w~~ater Standards Manual, would prepare project-specific SWPPPs and implement practices that would preclude significant water quality impacts. Additionally, proposed CPU policies within each of the CPU areas addressing adequate and reliable stormwater facilities and protection of water quality would further reinforce the existing regulatory framework. As future development would be required to adhere to the local, State, and Federal regulations, implementation of the proposed CPUs would result in less than significant cumulatively impacts on hydrology and water quality.

6.11.4 Significance of Impacts

Issue 1 Flooding and Drainage Patterns

All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed North Park CPU and associated discretionary actions would either remain the same as the existing condition or would be reduced when compared to the existing condition. Impacts would be less than significant and mitigation is not required.

Issue 2 Water Quality

New development under the proposed North Park CPU and associated discretionary actions would be required to implement LID and storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from North Park to receiving waters. Impacts would be less than significant and no mitigation would be required.

Future development would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual~~,~~. With implementation of these requirements, both surface and groundwater quality conditions would be protected ~~, both surface and groundwater, are~~and implementation of the CPU would not be expected to have an adverse effect on water quality. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. Impacts would be less than significant, and no mitigation would be required.

Issue 3 Groundwater

Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use and does not support municipal and domestic supply. Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in a less than significant impact on groundwater supply and quality.

6.11.5 Mitigation Measures

Implementation of the proposed North Park CPU and associated discretionary actions would not result in significant impacts to the environment. No mitigation is required.

6.12 Public Services and Facilities

Public services are those functions that serve residents on a community-wide basis. These functions include police protection, parks and recreation centers, fire protection, libraries, and schools. The following provides a discussion of public services and facilities as they relate to the proposed North Park Community Plan Update (CPU) and associated discretionary actions. This section is based on communication from service providers, which are included in Appendix J of this draft Program Environmental Impact Report (PEIR).

6.12.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. Existing conditions applicable to North Park specifically are discussed below. Figure 6.12-1 illustrates the location of the public services discussed below.

6.12.1.1 Police Protection

The North Park community is served by the Mid-City Neighborhood Division of the Police Department. The Mid-City area station is located at 4310 Landis Street within the City Heights community (Figure 6.12-1). The average response times for the City Heights Division for 2014 were 5.6 minutes for emergency calls, 10.3 minutes for priority one calls, 26.6 minutes for priority two calls, 71.1 minutes for priority three calls, and 69.7 minutes for priority four calls. The San Diego police Department's Citywide response time goals are seven minutes for emergency calls, 14 minutes for priority one calls, 27 minutes for priority two calls, 68 minutes for priority three calls, and 70 minutes for priority four calls.

6.12.1.2 Parks and Recreation Facilities

The North Park community is currently served by a number of parks, recreation centers, and joint-use facilities. North Park Community Park provides a recreation center, teen center, adult center, comfort station, a lighted ball field, multi-purpose turf areas, a children's play area, three tennis courts, handball courts, walkways, seating, and picnic tables. A portion of this park is part of the joint-use area with ALBA Charter School. Montclair Park, a neighborhood park, and Cedar Ridge Park, a pocket park, provide passive recreation amenities, such as multi-purpose turf areas, children's play areas, seating, picnicking, walkways, and landscaping. Existing recreation centers that serve the North Park community include the Morley Field Pétanque Center (formerly senior center) within Balboa Park, and North Park Recreation Center, which provides an indoor gymnasium, teen center, and multi-purpose/arts and crafts rooms. The Bud Kearns Aquatic Complex, located within the Morley Field area of Balboa Park, provides pool and support facilities. In addition to the ALBA

Map Source: SanGIS

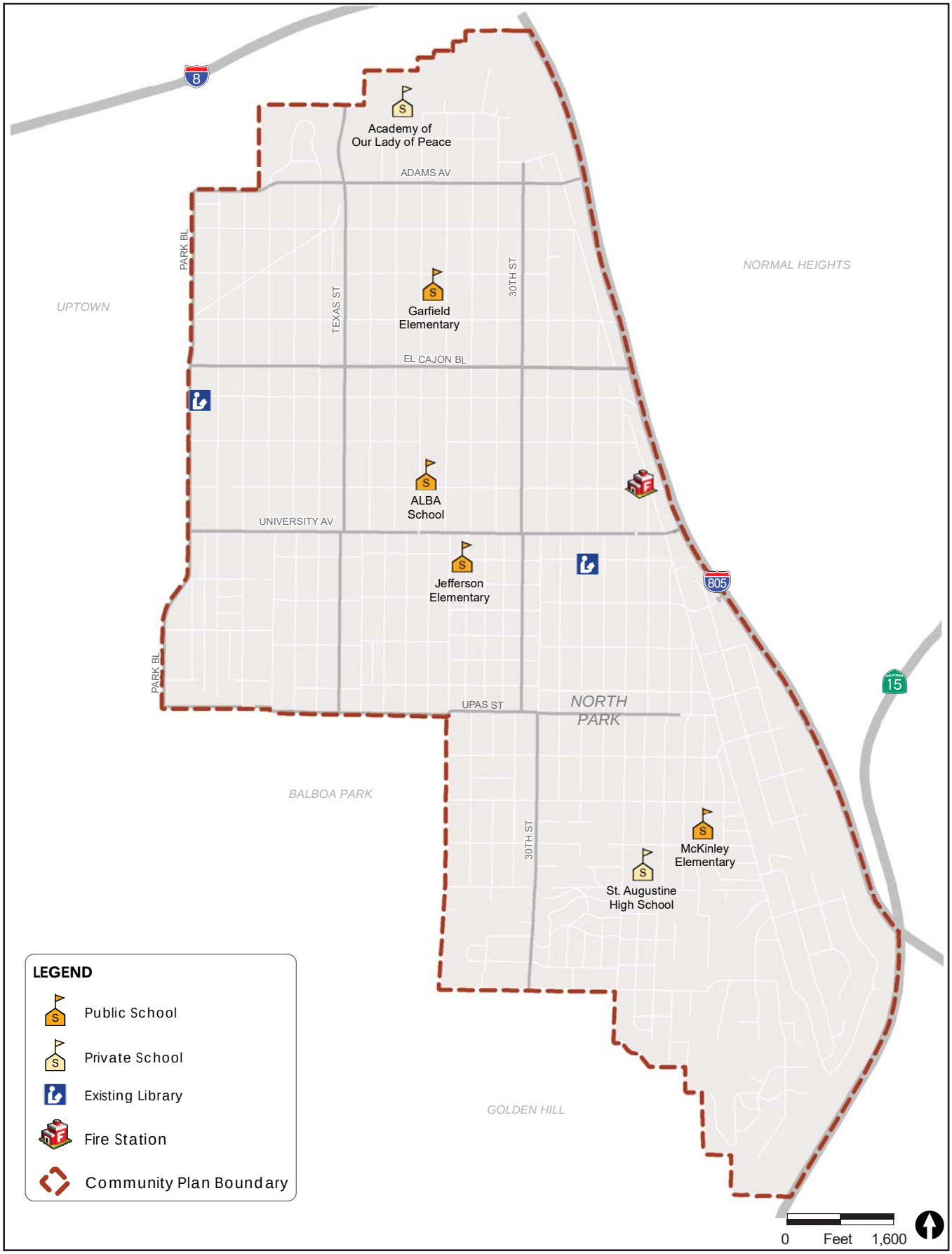


FIGURE 6.12-1

Location of Public Services and Facilities – North Park

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Charter School, joint-use facilities within North Park include Birney, Garfield, Jefferson and McKinley Elementary Schools.

At full community development, the projected population for the North Park community is 73,130. Therefore, according to General Plan standards for population-based parks of 2.8 usable acres per 1,000 residents, the community should be served by a minimum of 204.88 useable acres of park land at full community development. Additionally, at full community development, the project population warrants approximately two and one-half recreation centers equivalent to 49,810 total square feet and approximately one and one-half aquatic complex. Of the total of 204.88 acres of population-based parks needed to serve North Park at full community development, 16.37 acres currently exist, including the following parks and recreation facilities: North Park Community Park, Montclair Park, Cedar Ridge Park, ALBA Charter School joint use facility, Birney Elementary School joint use facility, Garfield Elementary School joint use facility, McKinley Elementary School joint use facility (in construction), and Jefferson Elementary School joint use facility. Currently the Community Plan area is served by the North Park Recreation Center and Bud Kearns Aquatic Complex.

6.12.1.3 Fire/Life Safety Protection

For the North Park community, the open space canyons, from which damaging fires have occurred in the past, is a particular threat. Structure fires and emergency response present daily demands on fire and life safety protection. Fire protection for the community is provided primarily by four fire stations. Station 14 is located within North Park at 32nd Street and Lincoln Avenue, which includes Engine 14, Truck 14, and Brush 14 and provides fire protection for the majority of the North Park community. Station 18 in Normal Heights services the northern end of the community and includes Engine 18 and Paramedic 18. Station 11 in Golden Hill serves the southern end of the community and includes Engine 11, Truck 11, and Paramedic 11. Station 5 in Hillcrest serves the western portion of the community and includes Battalion 2 and Engine 5 (Figure 6.12-1). No additional fire stations are planned within the community; however, a new station is proposed on Home Avenue and Interstate 805/Fairmount in City Heights, which would serve portions of North Park.

6.12.1.4 Libraries

The existing North Park Branch Library, originally built in 1959, is 8,000 square-foot and is located at 3795 31st Street (see Figure 6.12-1). There are plans to build an approximately 25,000 square feet new library depending on the site selected. The University Heights library located on Park Boulevard at Howard Avenue also services the North Park Community. General Plan policies PF-J.3 and PF-J.5, support libraries which serve larger areas to maximize capital efficiencies.

6.12.1.5 Schools

The North Park community is served by three public elementary schools (Garfield, Jefferson and McKinley), Roosevelt Middle School, and two high schools (San Diego High School and Hoover High School) (see Figure 6.12-1). In addition, there are charter schools, private schools, and neighboring community schools that help to serve the community. Schools in North Park are centrally located near other facilities and services and walking distance to transit. School sites are also often used as joint use facilities providing recreational opportunities.

6.12.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed North Park CPU, a significant public services and facilities impact would occur if implementation of the proposed North Park CPU and associated discretionary actions would:

1) Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

6.12.3 Impact Analysis

Issue 1 Public Facilities

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

a. Police Protection

Within the North Park CPU area, the Mid-City Division of the San Diego Police Department operates under the Citywide response time goals detailed in Chapter 5.0, Regulatory Framework (Section 5.12.1.1) of this PEIR and responds to emergency and priority one through four calls. There are no current plans for additional police substations in the proposed North Park CPU area. Correspondence with the San Diego Police Department identified that police response times within North Park will continue to increase with the build-out of the Community Plan, which could ultimately result in the need for new or expanded police services. However, as future development is proposed within the CPU area, individual projects would be subject to applicable Development Impact Fees (DIF) for public facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for North Park that will define applicable DIF fees for future development, including fees for police facilities funding.

Proposed North Park CPU policies support provision of police services within the CPU area by providing guidelines to reduce incidence of criminal activity within the North Park neighborhoods, including support for Neighborhood Watch and Community Alert Programs, increased foot and bicycle patrols, exchange of information with patrol officers, and development projects that provide adequate lighting, visibility for surveillance, and gradations between public and private space.

The proposed North Park CPU and associated discretionary actions do not include construction of new police facilities. As population growth occurs and the need for new facilities are identified, any

future construction of police facilities would be subject to a separate environmental review at the time design plans are available. Thus, while build-out of the CPU could result in the demand for new or altered police services, the existing DIF framework in place would require future projects within the CPU area to pay fees for future facility needs. Additionally, no police facilities are currently proposed and any future facility would require a site specific environmental review. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in less than significant environmental impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services.

b. Parks and Recreation

Based on the projected population for the North Park Community of 73,170, General Plan standards for population-based parks and recreation facilities would require the community to be served by a minimum of 204.88 useable acres of park land at full community development. Additionally, at full community development, the projected population warrants approximately two and one-half recreation centers equivalent to 49,810 total square feet, and approximately one and one-half aquatic complex.

Opportunities for additional park land and recreation facilities within the North Park Community are anticipated to come primarily through redevelopment of private and public properties and through the application of park equivalencies as detailed below. Facilities that may be considered as population-based park equivalencies include:

- Joint use facilities;
- Trails through open space;
- Portions of resource-based parks;
- Privately owned, publicly used parks;
- Non-traditional parks, such as rooftop or indoor recreation facilities; and
- Facility or building expansion or upgrades.

The General Plan allows park equivalencies to be used when vacant land is limited, unavailable or is cost-prohibitive. The application of park equivalencies is determined by the community and City staff through a set of guidelines. The community and City identified and evaluated population-based park and recreation opportunities, as well as potential park equivalency sites, for their recreational value, possible uses and functions, public accessibility, consistency with General Plan policies and guidelines, and other land use policy documents (e.g., Balboa Park Master Plan and Balboa Park East Mesa Precise Plan). Table 6.12-1 and 6.12-2 summarize the existing and future parks, park equivalencies and recreation facilities that have been selected by the North Park community to supplement their existing population-based park and recreation facilities inventory. The table also includes recommendations contained in the Balboa Park East Mesa Precise Plan for the Neighborhood Edge, including the Morley Field Area, where appropriate, as well as recommendations generated by the community and City staff for facilities outside of Balboa Park Figure 6.12-2 shows the locations of park facilities.

Table 6.12-1 Population-Based Parks and Recreation Facilities				
Parks/ Recreation Facilities	Existing Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Descriptions	Parks and Recreation Facilities Recommendations
Major Parks - None				
Community Parks				
North Park Community Park	7.90		Existing park and recreation facilities consisting of a recreation center, a teen center, an adult center, a comfort station, a lighted ball field, multipurpose turf areas, a children's play area, three tennis courts, handball courts, walkways, seating and picnic tables. Of the 7.90 acres, 2.84 acres is part of the joint use area with ALBA school.	Replace natural turf on ball field with synthetic turf and provide new sports field lighting to increase use.
Neighborhood Parks				
Montclair Park	4.97		Existing park consisting of passive recreation amenities, including multi- purpose turf area, children's play area, seating, picnicking, walkways, and landscaping.	
Mini Parks-NONE				
Pocket Parks/Plazas				
34th Street Pocket Park		0.15	Proposed pocket park is within the street- right-of-way and is the official trailhead to Juniper Canyon Open Space.	Vacate the street right-of-way, acquire site, design and construct park amenities to support passive recreation, such as a children's play area, seating, picnicking, walkways, and landscaping.
Cedar Ridge Park	0.27		Existing park consisting of passive recreation amenities, including multi- purpose turf area, children's play area, seating, walkways, and landscaping.	
North Park Mini-Park		0.50	Proposed park on City-owned property, on an undeveloped site.	Construct the park amenities consistent with the approved General Development Plan.
Lincoln Avenue Pocket Park		0.21	Proposed park on undeveloped street right-of-way, from Georgia Street to the existing alley, to accommodate passive recreational uses.	Vacate street right-of-way, acquire site, design and construct park amenities to support passive recreation, such as pathways, overlooks, seating, interpretive signs, and landscaping.
Switzer Canyon and 30th Street Pocket Park		0.16	Proposed park within City-owned open space in Switzer Canyon to accommodate passive recreational uses.	Design and construct park amenities to support passive recreation, such as seating, walkways, and interpretive signs.
Teresita & Maple Streets Pocket Park		0.17	Proposed pocket park on undeveloped street right-of-way to accommodate passive recreational uses, including a trailhead into Juniper Canyon Open Space.	Vacate street right-of-way, acquire site, design and construct park amenities to support passive recreation, such as a children's play area, seating, picnicking, walkways, landscaping, and a trail system staging area.

Table 6.12-1
Population-Based Parks and Recreation Facilities

Parks/ Recreation Facilities	Existing Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Descriptions	Parks and Recreation Facilities Recommendations
Special Activity Parks - None				
Recreation Centers				
North Park Recreation Center	N/A	N/A	Existing facility consisting of 11,232 sq. ft. provides an indoor gymnasium, teen center and multi-purpose/arts & crafts rooms housed in three separate buildings; facilities are outdated and in need of upgrades to fully serve the community.	Expand the existing recreation center to provide a 17,000 sq.ft. recreation facility (possibly add second story); Provide improvements and ADA upgrades. In the interim, redesign current foyer to serve as lobby area for recreation center; install additional outdoor security lighting, and extend security system into multi-purpose/arts & crafts room.
Adult Center at North Park Community Park	N/A	N/A	Existing facility consisting of 1,706 square feet provides meeting rooms, kitchen and outdoor game rooms; facilities are outdated to fully serve the community.	Replace and expand the existing adult center to provide 3,000 square feet, with recreation facilities designed to accommodate a variety of community oriented meeting and recreation programs for adults.
Morley Field Pétanque Center (within Balboa Park)	N/A	N/A	The existing Pétanque Center (formerly a senior center) was built in 1933 and is approximately 1,548 square feet and provides community meeting rooms and play areas.	Preserve and restore the existing historic Pétanque Center for community use.
Aquatic Complexes				
Bud Kearns Aquatic Complex (within Morley Field area of Balboa Park)	N/A	N/A	The existing historic Bud Kearns Pool and Clubhouse were built in 1933 and provide one community swimming pool and a building with changing rooms, showers and restrooms.	Preserve and restore and renovate the existing historic Bud Kearns pool facility to serve the Golden Hill and North Park Communities. Provide additional swimming facilities such as children's play pool, therapeutic pool and additional clubhouse pool building facilities to meet the needs for the community. The new facilities would augment and be complimentary to the existing pool and clubhouse without compromising the historic character of the original pool and clubhouse.
Joint Use Facilities				
ALBA ~~Charter~~ School (formerly North Park Elementary School)	0.12		Existing joint use facilities consisting of kindergarten play area, amphitheater, and outdoor lunch area pursuant to long- term lease agreement. The total joint use acreage is 2.96, of which 2.84 acres is located on North Park Community Park and 0.12 acres is located on School District property.	

Table 6.12-1
Population-Based Parks and Recreation Facilities

Parks/ Recreation Facilities	Existing Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Descriptions	Parks and Recreation Facilities Recommendations
Birney Elementary School	0.96		Existing joint use facilities consisting of turf multi-purpose playfield, multi- purpose courts, and hardscape for court games pursuant to long-term lease agreement. Facility is a total of 1.82 acres and is shared with; North Park (0.96 acres) and Uptown (0.86 acres).	
Garfield Elementary School	0.70		Existing joint use facilities consisting of turf multi-purpose fields pursuant to long- term agreement.	
Jefferson Elementary School	1.45		Existing joint use facilities consisting of multi-purpose synthetic turf playfield, multi-purpose courts, and hardscape for court games pursuant to long-term lease agreement.	
McKinley Elementary School		2.~~67~~52	Proposed joint use facilities at school site.	Construct the joint use amenities consistent with the approved General Development Plan.
Trails; Useable acres credit for trails was determined by multiplying the linear footage of trail by 12'-0" width and dividing by one acre in square feet (43,560)				
Juniper/34th Streets Canyon Open Space Trails		2.12	7,700 linear feet of existing and proposed trails located in Juniper/34th Streets Canyon Open Space (City-owned, MHPA-designated) which provide passive recreation.	Expand the existing 6,600 linear feet of trails by designing and constructing approximately 1,100 linear feet of new trails and provide trail improvements, such as interpretive signs, protective fencing, native landscaping, trash and recycling containers, overlooks, etc., where needed and appropriate for the trail type, as determined and approved by City.
Switzer Canyon Open Space Trails		1.80	6,500 linear feet of existing and proposed trails located in Switzer Canyon Open Space (City-owned, MHPA-designated) which provide passive recreation.	Expand the existing 5,400 linear feet of trails by designing and constructing approximately 1,100 linear feet of new trails and provide trail improvements, such as interpretive signs, protective fencing, native landscaping, trash and recycling containers, overlooks, etc., where needed and appropriate for the trail type, as determined and approved by City.
Portion of Resource-Based Parks				
Bird Park (within Balboa Park)		5.39	Existing park located in the northeast corner of Balboa Park which provides passive recreational uses, such as a children's play area, multi-purpose turf area, walkways, landscaping, and public art.	Design and construct additional amenities to implement the General Development Plan for Bird Park.

Table 6.12-1
Population-Based Parks and Recreation Facilities

Parks/ Recreation Facilities	Existing Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Descriptions	Parks and Recreation Facilities Recommendations
East Mesa Mini- Park (within Balboa Park)		1.00	Proposed mini-park located between Florida Canyon Dr., Upas St., Alabama St. and Morley Field Dr.	Design and construct passive park amenities, such as a children's play area, seating/picnicking, security lighting, walkways, landscaping, and community gardens consistent with recommenda-tions in the BPEMPP.
Morley Field Recreation Area (within Balboa Park)		57.00	Proposed recreation complex located on Upas Street in the Morley Field Recreation Area, which provides active and passive recreation, including organized sports (baseball and softball), tennis, swimming, senior center, bocce ball, picnicking, children's play area, dog off-leash area, archery, and multi-purpose turf areas.	Design and construct additional active and passive recreational and support facilities and upgrades, such as parking lots for expanded uses, multi-purpose turf fields, ball fields, children's play areas, sky plaza/promenade, concession building/comfort station, group picnicking, security lighting, upgrades to the dog off-leash area, path of travel and ADA upgrades consistent with the recommendations in the BPEMPP.
Pershing Recreation Complex (within Balboa Park)		5.00	Proposed community park/sports complex located at the corner of Pershing Drive and 26th Street. This site is currently used by City Central Operations Station facilities. This 15 acre facility will be shared with North Park, Golden Hill and Uptown and East Village in Downtown.	Design and construct community park/ sports complex with active recreation facilities consistent with the recommendations in the BPEMPP, subsequent to relocation of non-park, City facilities.
Skate Park / Bike Skills Park (within Balboa Park)		10.00	Proposed above-ground skate park and/ or Bike Skills/BMX track, located along Pershing Drive on the Arizona landfill. Facility will be shared with Golden Hill.	Design and construct above-ground skate and/or Bike Skills park, and support facilities, such as parking lot and portable restrooms. Amendment to the BPEMPP may be necessary.
Upas Street Mini Park (within Balboa Park)		1.58	Proposed mini-park located at the corner of Upas St. and Park Blvd.	Design and construct passive park amenities, such as a children's play area, seating/picnicking, security lighting, walkways, and landscaping.
Privately Owned Park Sites – None				
Non-Traditional Park Sites				
Boundary St. Linear Park		0.75	Proposed linear park located along Boundary St. between Howard and Lincoln Aves., on City and Caltrans right- of-way.	Pursue acquisition or a lease agreement with Caltrans; design and construct passive recreation amenities such as seating, walkways, and landscaping.
Howard Avenue Pocket Park		0.30	Proposed pocket park located at the southeast corner of the intersection of Howard Ave. with 32nd and Boundary Streets, on City and Caltrans right-of-way.	Pursue acquisition or a lease agreement with Caltrans; design and construct passive recreation amenities such as seating, walkways, and landscaping.

Table 6.12-1
Population-Based Parks and Recreation Facilities

Parks/ Recreation Facilities	Existing Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Descriptions	Parks and Recreation Facilities Recommendations
Madison Avenue Pocket Park		0.11	Proposed pocket park located at the intersection of Madison Ave. with Illinois and Boundary Streets, on City right-of- way.	Design and construct passive park amenities, such as seating, walkways and landscaping.
Facility or Building Expansion or Upgrade – None				
SOURCE: Proposed North Park CPU.				

Table 6.12-2
Summary of Existing and Proposed Population-Based Parks and Recreation Facilities

Population-Based Parks	Useable Acres
Existing Population-based Parks and Park Equivalencies	16.37 acres
Proposed Population-based Parks and Park Equivalencies	88.45 acres
Total Existing and Proposed Population-based Parks and Equivalencies	104.82 acres
Population-based Park Requirements at full community development	204.88 acres
Population-based park deficit at full community development	100.06 acres
Recreation Centers	**Square Feet**
Existing North Park Recreation Center Building, 11,232 square feet, to be replaced with a new facility for a for a total of 17,000 square feet.	17,000 SF
Existing Recreation Center: Morley Field Pétanque Center	1,548 SF
Existing North Park Adult Center Building, 1,706 SF existing, to be replaced with a new facility for a total of 3,000 ST	3,000 SF
Proposed Recreation Center: Morley Field Recreation Center	28,262 SF
Total Existing and Proposed Recreation Centers	49,810 SF
Recreation Center Requirement at full community development	49,810 SF
Recreation Center Deficit at full community development	No Deficit
Aquatic Complexes	**Unit**
Existing Aquatic Complex: Bud Kearns Community Swimming Pool	1.00
Proposed Aquatic Complex addition: Bud Kearns Community Swimming Pool	0.94*
Total Existing and Proposed Aquatic Complexes	1.94*
Aquatic Complexes Requirement at full community development	1.46*
Aquatic Complex deficit at full community development	No Deficit
*Bud Kearns Community Swimming Pool will be shared. Greater Golden Hill requires 0.48, and North Park requires 1.46, aquatic complexes. The proposed, larger facility will satisfy the combined requirements (1.94 aquatic complexes) for both communities.	
Note: Identification of private property as a potential park site does not preclude permitted development per the designated land use. SOURCE: Proposed North Park CPU.	

Map Source: SanGIS

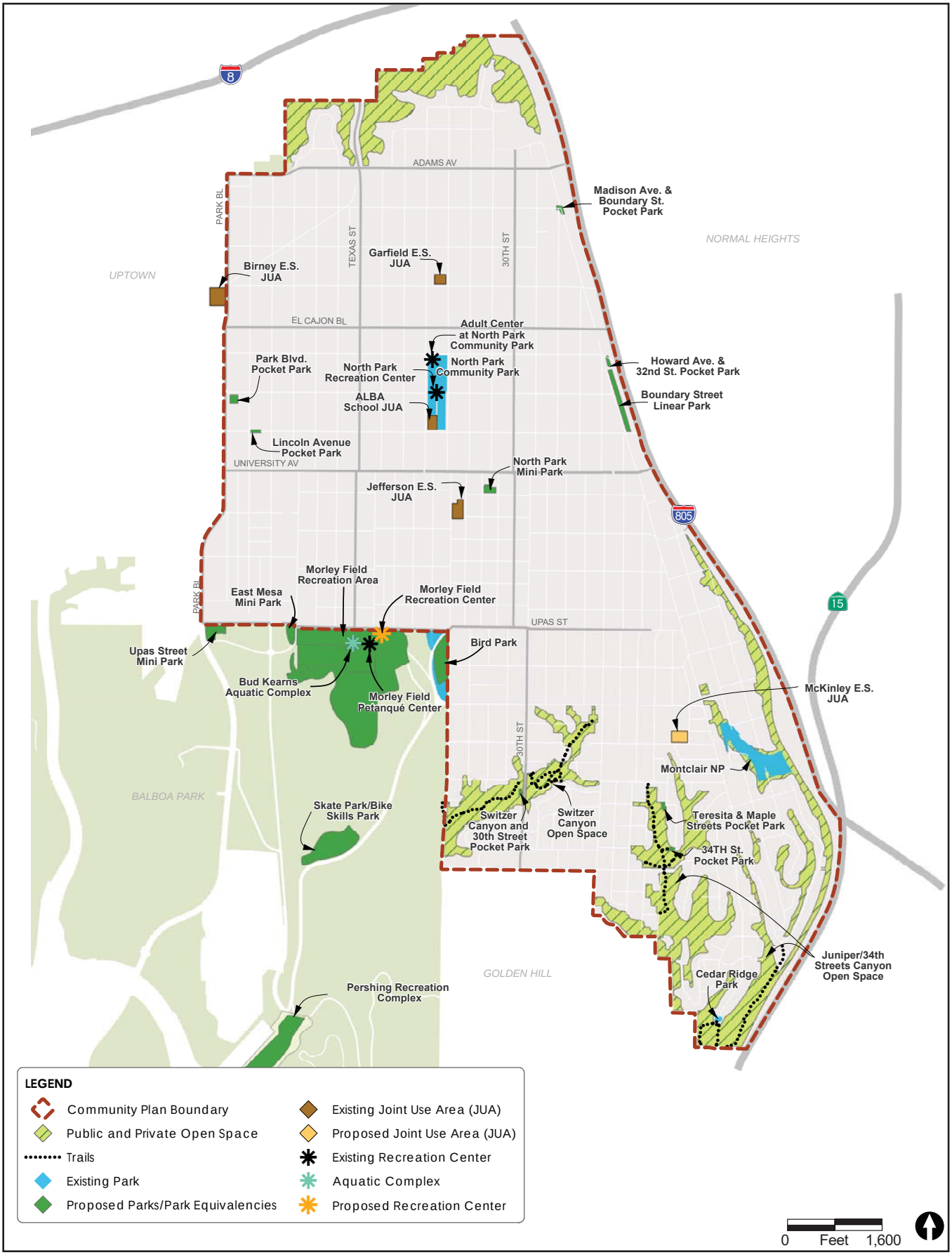


FIGURE 6.12-2

Parks, Recreation Facilities, and Open Space – North Park

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A total of 204.88 acres of population-based parks would be needed to serve North Park at full community development, of which 16.37 currently exist. Through the proposed North Park CPU effort, City staff and community members have identified 88.45 acres of proposed new population-based park land and park equivalency sites within and adjacent to the North Park community, that when implemented would reduce the existing population-based park deficit to 100.06 acres.

Build-out of the proposed North Park CPU would add additional population to the CPU area and the CPU area would continue to have a deficit of population based parks at build-out; which would be an adverse impact. Future development proposed within the CPU area would be subject to payment of DIF for public facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for North Park would define applicable DIF fees for future development including fees for park funding. However, fees would not be adequate to address the extent of the parkland deficit. Payment and receipt of DIF funds is contingent on future development and proposed fees are not designed to fully fund and address the parkland deficit.

The proposed North Park CPU Recreation Element provides a policy framework that supports acquisition and development of new public parks and park equivalencies and encourages new private development to include recreational facilities.

Thus, although the existing and projected deficit in population-based parks is adverse, impacts associated with the construction of park facilities would be less than significant at the program-level. Implementation of the proposed North Park CPU and associated discretionary actions would provide policy support for increasing the acreage of population-based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in a less than significant impact associated with the construction of new facilities in order to maintain performance objectives for parks.

c. Fire/Life Safety Protection

With the implementation of the proposed North Park CPU and associated discretionary actions, there would be an increase in overall population which could result in a change in response times. However, future facilities would be planned based on adopted General Plan Public Facilities Element standards detailed in Chapter 5.0, Regulatory Framework (Section 5.12.1.3) of this PEIR. The proposed North Park CPU and associated discretionary actions does not propose the construction of fire/life safety facilities. However, the proposed North Park CPU contains a policy framework that addresses maintaining the high level of fire protection throughout the North Park community. Additionally, as future development is proposed within the North Park CPU area, individual projects would be subject to payment of DIF, which would provide facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for North Park that will define applicable DIF fees for future development, including funding for fire facilities.

At the programmatic level the proposed increase in population would not require that the Fire-Rescue Department construct new facilities. Any expansion construction of existing facilities or the development of a new facility would be subject to separate environmental review at the time design

plans are available. Therefore, at the program-level of analysis provided in this PEIR, impacts associated with police/life safety facilities would be less than significant.

d. Libraries

As identified above, two libraries currently serve the North Park community. Correspondence with the Library Department (Appendix J) confirms that the City does not require the construction of any additional facilities to meet library service requirements of the proposed North Park CPU. While not required, there are plans to build an approximately 25,000 square foot new library, which would result in an exceedance of the recommended minimum branch library size requirement of 15,000 square feet. The new library would proceed as a separate action from the proposed North Park CPU and associated discretionary actions and would be required to undergo its own environmental review. The proposed CPU Public Facilities, Services, and Safety Element policy framework supports expanded library facilities, which the new North Park Branch Library would address. Any expansion construction of existing facilities or the development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, since the proposed North Park CPU and associated discretionary actions does not include the construction of library facilities and facility needs would be met within the CPU area, impacts related to library facilities would be less than significant.

e. Schools

Student generation is based on housing units. For the North Park community, based on 2010 Census data from San Diego Association of Governments (SANDAG), there are 22,998 existing units. An additional 7,044 residential units are proposed with the proposed North Park CPU. Per correspondence with San Diego Unified School District in April 2014 (Appendix J), student generation rates vary based on the type of project, number of units, bedroom mix, affordable or senior housing component, proximity to schools and other amenities, neighborhood, and other factors. There are no district standard or school-specific rates.

Typically, to provide student generation rates for a new project, San Diego Unified School District demographers would research similar nearby developments and their student generation rates as a guide for how many students the new project may generate. For the proposed North Park CPU and associated discretionary actions, however, many factors are not yet determined, such as the specific type of housing and bedroom mix that may be constructed with the potential increase in housing stock at some future point in time. To estimate the number of students potentially generated by future build-out of the proposed North Park CPU and associated discretionary actions, SDUSD demographers referenced the number of existing housing units in the North Park community and the current number of students who reside in North Park (based on District data), to determine the current community-wide student generation rates. This information is summarized in Table 6.12-3.

Table 6.12-3 North Park Student Generation Rates from Existing Housing Units		
Number of Existing Units	2013-2014 Students (K-5, 6-8, 9-12, and K-12 total)	Student Generation Rate (per unit)
22,998	K-5: 1,745	K-5: 0.076
	6-8: 695	6-8: 0.030
	9-12: 934	9-12: 0.041
	K-12: 3,374	**K-12: 0.1.47**

Based on the number of additional units proposed by the proposed North Park CPU and associated discretionary actions and student generation rates included in Table 6.12-3, potential student generation for future build-out of North Park is shown in Table 6.12-4. The generation rates are shown as a range. The current generation rate is the low range and the high range is double the low range (current generation rate). A key assumption is that future additional housing units will generate students at a rate similar to current housing units; this is represented by the low range. If future additional housing units are significantly different from the current units in terms of student generation, the number of students could be higher, as indicated by the high range.

Table 6.12-4 North Park Potential Student Generation Rates from Future Additional Housing Units		
Number of Additional Units	Number of Potential Students	Potential Student Generation Rates
7,044	K-5: 535-1,071	K-5: 0.076-0.152
	6-8: 211-423	6-8: 0.030-0.060
	9-12: 289-578	9-12: 0.041-0.082
	K-12: 1,035-2,071	**K-12: 0.147-0.294**

SDUSD demographers indicated that the cumulative potential increase in students from the number of future additional housing units suggested in the proposed North Park CPU and associated discretionary actions would likely impact district schools to the point of reaching or exceeding capacity. Therefore, new or expanded school facilities would likely be needed.

Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. Senate Bill (SB) 50, enacted on August 27, 1998, significantly revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. The school district will be responsible for potential expansion or development of new facilities, which would undergo a separate environmental review when specific facilities are planned. Therefore, impacts to schools resulting from future development would be less than significant through implementation of Senate Bill 50 (City of San Diego 2011).

f. Maintenance of Public Facilities

The proposed North Park CPU Public Facilities, Services, and Safety Element contains a policy framework related to the maintenance of public facilities. Proposed policies support maintenance assessment district programs and road and water facility improvements. Additionally, as future development is proposed within the North Park CPU area, individual projects would be subject to payment of DIF, which would provide facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for North Park that will define applicable DIF fees for future development. The proposed North Park CPU and associated discretionary actions does not propose any construction of specific facilities. When future facilities are constructed they would require a separate environmental review. Thus, public facilities impacts would be less than significant.

Cumulative Impact Analysis

Some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve additional population. Therefore, it is anticipated that new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth occurring through infill and redevelopment as well as on remaining vacant and developable lands. However, as discussed in this section, implementation of the proposed North Park CPU and associated discretionary actions does not include construction of any specific public facilities or services. The proposed CPU includes policies that would support improvements to public facilities and includes a proposed IFS as part of the project that would specify the DIF applicable to future development within the CPU area. Similarly, the proposed Golden Hill and Uptown CPUs do not propose specific facility improvements.

The specific public facilities improvements that would be constructed in the cumulative area of Uptown, Golden Hill and North Park and the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis. However, each future facility improvement would undergo a separate environmental review and are not intended to be analyzed for purposes of this proposed North Park CPU. Thus, cumulative impacts related to public facilities would be less than significant.

6.12.4 Significance of Impacts

Regarding police protection, the proposed North Park CPU and associated discretionary actions do not include construction of new police facilities. As population growth occurs and the need for new facilities is identified, any future construction of police facilities would be subject to a separate environmental review at the time design plans are available. Therefore, implementation of the proposed North Park CPU and associated discretionary actions would result in less than significant environmental impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services, and no mitigation is required.

Regarding park and recreational facilities, there is an existing and projected deficit in population-based parks, which is an adverse impact, but not considered significant at the program level.

Implementation of the proposed North Park CPU and associated discretionary actions would provide policy support for increasing the acreage of population based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed North Park CPU and associated discretionary actions would result in a less than significant impact related to parks and recreation, and no mitigation is required.

Regarding fire/life safety protection, implementation of the proposed North Park CPU and associated discretionary actions would result in an increase in overall population which could result in a change in fire-rescue response times and a demand for new or expanded facilities. However, any expansion construction of existing facilities or the development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, at the impacts associated with police/life safety facilities would be less than significant, and no mitigation is required.

Although a new library is planned for the North Park CPU area, the proposed North Park CPU and associated discretionary actions does not include construction of library facilities. Development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, impacts related to library facilities would be less than significant, and no mitigation is required.

Regarding school facilities, future residential development that occurs in accordance with the proposed North Park CPU and associated discretionary actions would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill 50 to mitigate any potential impact on district schools. The City is legally prohibited from imposing any additional mitigation related to school facilities through implementation of Senate Bill 50, and the school district would be responsible for potential expansion or development of new facilities. Therefore, impacts to schools would be less than significant, and no mitigation is required.

The proposed North Park CPU contains policies to address the maintenance and improvement of public facilities. Impacts would therefore be less than significant, and no mitigation is required.

6.12.5 Mitigation Measures

No mitigation is required for police protection, parks and recreation facilities, fire services, library services, schools, and maintenance of public facilities. While the implementation of the proposed North Park CPU and associated discretionary actions would result in the continuation of a park deficit, which is an adverse impact it is less than significant. No mitigation is required.

6.13 Public Utilities

This section analyzes the impacts of the proposed North Park Community Plan Update (CPU) and associated discretionary actions on existing public utilities systems, including those for water, sewer, storm water, communications, solid waste, and energy.

6.13.1 Existing Conditions

A discussion of existing conditions for water supply, sewer, storm water, solid waste, energy, and communications in the North Park CPU area is provided in Chapter 2.0. The existing regulatory framework is summarized in Chapter 5.0. Specific discussion relating to the water supply assessment for North Park is presented below. Additional information and analysis relative to drainage and storm water are also provided in Section 6.11.

6.13.1.1 Water Supply

PUD Water Supply Assessment and Verification

The City's Public Utilities Department (PUD) prepared a Water Supply Assessment (WSA) report for the proposed North Park CPU and associated discretionary actions (May 2015), which is included as Appendix K to this PEIR. The WSA was prepared for the proposed North Park CPU and associated discretionary actions to assess whether sufficient water supplies are, or will be, available to meet the projected water demands associated with both of the land use scenarios proposed. Because no subdivision of land is proposed as part of this project, this WSA was prepared in compliance with the requirements of Senate Bill 610. The WSA includes, among other information, identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the proposed North Park CPU and associated discretionary actions; and quantities of water received in prior years pursuant to those entitlement, rights, contracts, and agreements.

6.13.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed North Park CPU and associated discretionary actions, impacts related to water, sewer, solid waste, energy, and communications would be significant if the proposed North Park CPU and associated discretionary actions would:

1) Result in the use of excessive amounts of water beyond projected available supplies;
2) Promote growth patterns resulting in the need for and/or provision of new or physically

altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives;

3) Result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan.

6.13.3 Impact Analysis

Issue 1 Water Supply

Would the project use excessive amounts of water beyond projected available supplies?

The WSA evaluated water supplies that are, or will be, available during a normal, single- dry year, and multiple-dry year (20-year) period, to meet the estimated demands of the proposed North Park CPU and associated discretionary actions. The WSA for the North Park CPU and associated discretionary actions was prepared in 2015. Subsequent land use changes were made to the proposed Land Use Plan, resulting in increased build-out intensity. However, despite the land use changes, the anticipated growth within the proposed North Park CPU area would be consistent with growth projections used to prepare the 2010 Urban Water Management Plan (UWMP), as discussed below.

The San Diego Association of Governments (SANDAG) Series 12 – 2050 Regional Forecast shows that by the year 2050 North Park could have 35,252 total housing units. The Series 12 SANDAG forecast represents the long-term development of the adopted Community Plan. The proposed draft Community Plan is estimated to have a total build-out of 35,488 housing units. This is a potential increase of 236 total housing units above the SANDAG forecast for 2050. While the Community Plan build-out is a theoretical calculation of build-out with could occur after 2050 rather than a forecasted amount. The SANDAG forecasts takes economic trends in the market, and demographic changes which affects demand for housing for the region and the community together. The Community Plan estimated build-out assumes 1,292 fewer single-family homes and 1,528 additional multi-family units from the forecast at the year 2050.

The 2010 UWMP bases the projected demand for water on the SANDAG Series 12 Forecast for the year 2035. The SANDAG Series 12 Forecast indicates that North Park could have 29,312 housing units by the year 2035, which is 5,940 few housing units than SANDAG is forecasting for the year 2050. The SANDAG Forecast shows that by 2035 there is an adequate supply of housing to meet the demand without utilizing the full forecast housing capacity. Thus, the theoretical Community Plan build-out would add 236 additional housing units beyond the SANDAG Forecast. The utilization of the capacity could happen between 2035 and 2050 or beyond. This is to say, if the additional supply of 236 multifamily units was included into the forecast, it would not occur prior to 2035 since an increase in supply is not going to significantly affect the increase in demand for infill housing in an urban area.

The draft Community Plan build-out estimates that North Park will have 71,184 people living in an occupied housing unit by the year 2050 which is 473 people more than the SANDAG Series 12 Forecast for the year 2050. The draft Community Plan build-out used an assumption with a vacancy

rate of 4.34 percent and 2.09 persons per household for all structure types which is consistent with the SANDAG Forecast. The SANDAG Series 12 Forecast shows that North Park could have 10,445 total employees by 2035 and 11,346 total employees by 2050. The Draft Community Plan build-out estimate for employment does not change from the 2035 or 2050 forecast years since the draft Community Plan is not modifying the amount of intensity of commercial land use designations which would change the amount of future employment. Thus, based on build-out of land uses for the proposed North Park CPU, the water demand projections would be consistent with the 2010 UWMP.

In addition, Metropolitan Water District (MWD) and the San Diego County Water Authority (Water Authority) have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. MWD's Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan, the Water Authority's 2010 UWMP and annual water supply report, include water infrastructure projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water.

Based on a normal water supply year, the estimated water supply projected in five-year increments for a 20-year projection will meet the City's projected water demand of 240,472 acre-feet in 2015; 260,211 acre-feet in 2020; 276,375 acre-feet in 2025; 288,481 acre-feet in 2030; and 298,860 acre-feet in 2035. Based on a single-dry year forecast, the estimated water supply will meet the projected water demand of 255,040 acre-feet in 2015; 276,526 acre-feet in 2020; 293,895 acre-feet in 2025; 307,230 acre-feet in 2030; and 318,586 acre-feet in 2035. Based on a multiple-dry year, third year supply, the estimated water supply will meet the projected demands of 281,466 acre-feet in 2015; 303,004 acre-feet in 2020; 322,166 acre-feet in 2025; 334,720 acre-feet in 2030; and 346,823 acre-feet in 2035.

As discussed in the WSA and further discussed above, the build-out projections for the proposed North Park CPU and associated discretionary actions are consistent with the water demand assumptions included in the regional water resource planning documents of the Water Authority and MWD. UWMPs are required to be updated every five years. Future water supplies, as well as the actions necessary to develop these supplies, will be identified in the water resources planning documents of the PUD, the Water Authority, and MWD to serve the projected demands of the proposed CPU area, in addition to existing and planned future water demand of the PUD. The City of San Diego's 2015 UWMP is presently in draft (April 2016). The proposed North Park CPU and associated discretionary actions, once adopted, would be considered in the next cycle of the City's water supply planning. No construction or expansion of water supply facilities is proposed in conjunction with the proposed North Park CPU and associated discretionary actions; however, should new facilities be required to be constructed in the future, each would undergo site-specific environmental analysis as needed. Therefore, impacts related to water supply would be less than significant.

Issue 2 Utilities

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

The City's General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the proposed North Park CPU and associated discretionary actions would result in infill and redevelopment occurring in selected areas within the North Park CPU area, as stated within the proposed North Park CPU. The City's existing built areas are currently served by storm water, wastewater, and water infrastructure, and various communications systems; however, some of the City's built areas, including those within the North Park community, have existing infrastructure deficiencies and would require capacity improvements to serve the existing and projected population. The following is a program-level analysis of the significance of impacts under California Environmental Quality Act (CEQA) for each applicable utility.

a. Storm Water

Because the North Park CPU area is highly impervious, the volume or rates of runoff are not likely to be increased by new development. It is more likely that the volume and rate of runoff could be slightly decreased due to new storm water quality regulations, which require implementation of Low Impact Development (LID) practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation.

No storm drains or other community-wide drainage facilities are proposed for construction in conjunction with adoption of the proposed North Park CPU and associated discretionary actions. However, plans and programs are in place Citywide to maintain and upgrade the storm water system. As individual development projects are implemented in accordance with the proposed North Park CPU and associated discretionary actions, localized improvements to the storm water system would be required as part of the project design and review. All storm water facilities constructed in conjunction with future development would be reviewed for consistency with the City's Storm Water Standards and other applicable requirements.

All future projects would be required to adhere to General Plan and proposed North Park CPU policies and implementing regulations and are required to comply with the City's Storm Water Standards. Proposed North Park CPU policies include those implementing Best Management Practices (BMPs) and LID strategies to manage storm water and urban runoff, as well as those promoting proper maintenance of existing storm water infrastructure, thus reducing potential strains on the City's storm water system and ensuring the long-term viability of existing facilities. While the details of storm water infrastructure improvements would depend on the actual design of a future project, strict adherence to existing storm water regulations, conformance with General Plan and the proposed North Park CPU policies, and project-specific review under CEQA for discretionary projects would assure that significant adverse effects to the City's storm water system, as well as significant impacts associated with the installation of new storm water infrastructure, would be avoided.

b. Sewer

The proposed North Park CPU is a program-level document and does not propose any specific development projects. Furthermore, no new sewer collection or wastewater treatment facilities are proposed in conjunction with the proposed North Park CPU and associated discretionary actions. Any future development would be required to comply with the City's Municipal Code regulations regarding sewers and wastewater facilities (Chapter 6, Article 4) and would be expected to follow the City's Sewer Design Guidelines. Adherence to existing regulations and standards would ensure that flows from new projects would not adversely affect downstream conveyance systems and that previous studies have accounted for those flows in the design of the downstream conveyance system.

Given ongoing and planned improvements to the system, existing regulations and guidelines to ensure adequate capacity, and proposed North Park CPU policies to support capital improvements, impacts associated with the wastewater system would be less than significant, and no mitigation is required.

c. Water Distribution

The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's Capital Improvements Program. These improvements are determined based on continued monitoring by the PWD Engineering Division to determine remaining levels of capacity. The PWD Engineering Division plans its capital improvement projects several years prior to pipelines actually reaching capacity.

As future development takes place in the North Park CPU area, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines and mains. This would be reviewed on a project-by-project basis. Additionally, the proposed North Park CPU contains a policy (SE-3.15) supporting the use of water-wise practices, to include use or recycled and/or gray water for irrigation. All proposed public water facilities would be required to be designed and constructed in accordance with established criteria in the City's Water Facility Design Guidelines, Land Development Code, and any other applicable regulations, standards, or practices. Future development under the proposed North Park CPU and associated discretionary actions would be generally consistent with the existing urban growth patterns and the necessary infrastructure improvements to the water system would be consistent with what is necessary for new development and to maintain the existing system. The proposed North Park CPU contains a policy (PF-1.15) to support the systematic improvement and gradual replacement of water facilities.

Given that future improvements to water facilities in accordance with the proposed North Park CPU would be consistent with existing development and capital improvements planning, would be consistent with planned water supplies and demands, and would comply with existing guidelines and regulations and proposed North Park CPU policies, the impact would be less than significant.

d. Communications

Private utility companies currently provide communications systems within the North Park CPU

area. Future siting of communications infrastructure would be in accordance with the Land Development Code, including section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts. Adhering to General Plan policies supporting the City's undergrounding program would also ensure that visual impacts of new facilities are minimized. Similarly, the proposed North Park CPU contains policies supporting utility undergrounding (PF-1.9) and undergrounding is currently underway in the North Park community. Any construction of communications systems associated with future development would occur in accordance with the City's permitting processes and construction standards to avoid or minimize impacts on environmentally sensitive habitat areas and landforms through siting, grading or excavation, and erosion. Thereby, impacts associated with communications facilities from build-out of the proposed North Park CPU and associated discretionary actions would be less than significant.

Issue 3 Solid Waste and Recycling

Would the proposed project result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan?

The California Department of Resources Recycling and Recovery (CalRecycle) provides estimates of solid waste generation rates for different types of land uses. These rates estimate the amount of solid waste generated by residences or businesses over a certain amount of time (day, year, etc.). Waste generation rates include all materials discarded, whether or not they are later recycled or disposed of in a landfill, since under State law the total amount of waste "generated" is considered to be the sum of the waste "disposed" plus the waste "diverted" from disposal. Waste generation rates can be used to estimate the impact of new development on the local solid waste infrastructure, although it should be noted that impacts to solid waste infrastructure are not necessarily the amount of waste, but whether any increase would require the development of new facilities. Since the majority of waste is managed through waste diversion, solid waste facilities include those necessary to provide composting, recycling, and other collection, separation, and diversion services. Furthermore, it is specifically the amount of waste remaining for disposal that is considered for compliance with the City's Climate Action Plan and has the greatest potential for impacts associated with greenhouse gas emissions.

Future projects that could occur in the North Park community with the implementation of the proposed North Park CPU and associated discretionary actions would be required to comply with City regulations, including the City's Recycling Ordinance (updated July 2015). In addition, a Waste Management Plan (WMP) would be required for any project that exceeds the City's threshold, currently the generation of 60 or more tons of solid waste for projects of 40,000 square feet or more. The City also has an ordinance requiring the provision of sufficient interior and exterior storage space for refuse and recyclable materials (Section 142.0801 et. seq. of the Land Development Code). Additionally, most development projects must comply with the City's Construction and Demolition (C&D) Ordinance. These ordinances, and development of Waste Management Plans will impose new burdens on City and private diversion infrastructure, such as the composting operation at the Miramar Landfill and privately-operated materials recovery facilities, and are intended to help divert solid waste from the region's landfills, including the

privately operated Sycamore and Otay landfills, and the City's Miramar Landfill, to preserve capacity, and to support the 75 percent waste diversion goals established by Assembly Bill 341 and the City's Climate Action Plan.

The General Plan addresses waste management in Policies PF-I.1 through PF-I.5, focusing on waste diversion in PF-I.2. The City also has adopted a Zero Waste Plan, which targets 75 percent waste diversion by 2020, 90 percent waste diversion by 2035 and 100 percent diversion by 2040. Although compliance with existing ordinances is not sufficient to achieve these targets, and existing recycling infrastructure is not sufficient to accommodate future increases in organics diversion required by AB 1862, the development of Waste Management Plans allows flexibility to require site-specific measures to reduce waste.

All future development would be required to participate in the above-mentioned programs and comply with City General Plan requirements, along with the C&D and Recycling ordinances. Doing so would avoid significant solid waste disposal impacts related to the construction and operation of future development consistent with build-out of the proposed North Park CPU and associated discretionary actions. Therefore, at this program-level of review, the proposed North Park CPU and associated discretionary actions would not require increased landfill capacity, and impacts associated with solid waste would be less than significant. Should new solid waste, recycling or compost facilities be required to be constructed in the future, each would undergo site-specific analysis to evaluate impacts, as needed.

Cumulative Impacts

Water Supply

As detailed under Issue 1 above, water demands associated with build-out of the proposed North Park CPU would be consistent with the water demand assumptions included in the regional water resource planning documents of the Water Authority and the Metropolitan Water District (MWD). Furthermore, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the Water Authority, and MWD to serve the projected demands of the proposed North Park CPU area, in addition to existing and planned future water demand of the City (including the Uptown and Golden Hill CPU areas). Additionally, the proposed North Park CPU contains policies intended to: ensure that no excessive water use takes place; encourage water conservation and reclamation, and ensure the continued operability of existing infrastructure. Cumulative impacts associated water demand of the proposed North Park CPU and associated discretionary actions combined with water demand of surrounding communities would be less than significant.

Utilities

No significant cumulative impacts related to public utility infrastructure including storm water, water, wastewater, and solid waste systems/facilities would result from build-out of the proposed North Park CPU and associated discretionary actions combined with development of surrounding CPUs including Golden Hill and Uptown. This conclusion is based on required conformance with the City General Plan and CEQA processes for applicable development projects. Implementation of the

General Plan, applicable CPU policies of each community, and compliance with federal, State, and local regulations would preclude incremental impacts associated with new construction of, or improvements to, public utilities infrastructure. The proposed North Park CPU and associated discretionary actions do not propose improvements to storm water, water or wastewater infrastructure or communication systems. At the program-level, no associated significant impacts would result from implementation of the proposed North Park CPU and associated discretionary actions, based on mandatory compliance with City standards for the design, construction, and operation of storm water, water and wastewater infrastructure (including environmental review). As a result, the proposed North Park CPU and associated discretionary actions combined with development in the surrounding CPU areas would result in a less than significant cumulative impact associated with storm water, water, wastewater, and communication systems.

Solid Waste

The proposed North Park CPU and associated discretionary actions in addition to development in surrounding CPU areas including Golden Hill and Uptown would generate solid waste through demolition/construction and ongoing operations. When evaluated in conjunction with past, present, and future projects, build-out of the proposed North Park CPU and surrounding CPU areas would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with the Municipal Code, and consistency with the General Plan and proposed CPU policies promoting waste diversion would serve to preserve solid waste capacity. Discretionary projects generating more than 60 tons of waste would be required to develop and implement WMAs targeting 75 percent waste diversion. Therefore, there would be no cumulatively significant impact to solid waste disposal.

6.13.4 Significance of Impacts

Issue 1 Water Supply

There is sufficient water supply to serve existing and projected demands of the proposed North Park CPU and associated discretionary actions. Future water demands within the PUD's service area would be accounted for in subsequent UWMPs. Therefore, impacts of the proposed North Park CPU and associated discretionary actions on water supply would be less than significant.

Issue 2 Utilities

a. Storm Water

Future projects would be required to exercise strict adherence to existing storm water regulations and conformance with General Plan and proposed North Park CPU policies. Project-specific review under CEQA would assure that significant adverse effects to the City's storm water system, as well as significant impacts associated with the installation of new storm water infrastructure, would be avoided.

b. Sewer and Water Distribution

The proposed North Park CPU acknowledges that upgrades to sewer lines are an ongoing process. These upgrades are administered by the PWD and are handled on project-by-project basis. Because future development of properties with the proposed North Park CPU and associated discretionary actions will likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. The proposed North Park CPU takes into consideration the existing patterns of development and the update is a response to the community's needs and goals for the future. The necessary infrastructure improvements to storm water, wastewater, and water infrastructure would be standard practice for new development to maintain or improve the existing system in adherence to sewer and water regulations and conformance with General Plan and proposed North Park CPU policies. Additionally, future discretionary projects would be required to undergo project-specific review under CEQA that would assure that impacts associated with the installation of storm water infrastructure would be reduced to below a level of significance. Therefore, impacts to sewer and water utilities would be less than significant.

c. Communications

Given the number of private utility providers available to serve the proposed North Park CPU area there is capacity to serve the area. Impacts would be less than significant.

Issue 3 Solid Waste and Recycling

To ensure waste diversion and recycling efforts during construction and post-construction future land use occupancy and operation (i.e., residential, commercial, industrial, mixed-use, etc.) are addressed, a WMP shall be prepared for any discretionary project proposed under the proposed North Park CPU and associated discretionary actions exceeding the threshold of 40,000 square. Implementation of these WMPs would ensure that future development project impacts would be considered less than significant. Non-discretionary projects proposed under the proposed North Park CPU and associated discretionary actions, and discretionary projects that fall below the 60 ton threshold, would be required to comply with applicable San Diego Municipal Code sections addressing construction and demolition debris, waste a recyclable materials storage, and recyclable materials (and, in the future, organic materials) collection. Therefore, at this program-level of review, the North Park CPU would not require increased landfill capacity, and impacts associated with solid waste would be less than significant.

6.14 Health and Safety

This section describes potential human health and public safety issues related to the presence of hazardous materials and other hazards within the North Park Community Plan Update (CPU) area, identifies pertinent regulatory standards, and evaluates potential impacts and associated mitigation requirements related to implementation of the proposed North Park CPU and associated discretionary actions. KLR Planning conducted a GeoTracker search (May 2016) within the proposed North Park CPU area. The results of that search are included in Appendix L of this PEIR. Additionally, KLR Planning conducted a Cal Environmental Protection Agency (EPA) search (May 2016) of Cortese List Data Resources, the results of which are included in this section as Table 6.14-1.

6.14.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. The following paragraphs discuss health and safety issues which are specific to the North Park CPU.

A search of Federal, State, and local environmental regulatory agency databases was conducted in order to identify sites within the North Park community that may have been impacted by hazardous materials or wastes. The search identified 40 documented release cases within North Park, of which two are open (see Table 6.14-1). All of the identified sites are/were the site of either a LUSTs or cleanup program. Leaking underground storage tank systems pose a significant threat to groundwater quality in the United States. Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of "non-federally owned" sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, and some brownfields.

These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are plentiful and diverse and include solvents, pesticides, heavy metals, and fuel constituents to name a few. Properties with open cases represent a moderate to high risk of encountering impact during potential future redevelopment. Closed release cases represent a low to moderate risk of encountering impact during potential future redevelopment. However, cases which were closed in the 1990s may not meet current standards and may require additional investigation and/or remediation prior to redevelopment.

Table 6.14-1 Hazardous Materials Sites in North Park			
Site	Address	Program/Site Type	Status
Cliff Brown Automotive	4491 Park Boulevard	LUST	Closed
G.B. Sales	4441 Park Boulevard	LUST	Closed
Perez Box Co AT0118	1924 Adams Avenue	Cleanup Program Site	Closed
Joseph H. Giesen	2101 Adams Avenue	LUST	Closed
Texas Street Ultramar	4616 Texas Street	LUST	Closed
Henry's Garage	2821 Adams Avenue	LUST	Closed
PB Auto Repair	3085 Madison Avenue	LUST	Closed
The Car Shop	3085 Madison Avenue	LUST	Closed
Unocal Serv Stn #6103-31095	3154 El Cajon Boulevard	LUST	Closed
North Park Service Cntr	3001 El Cajon Boulevard	LUST	Closed
N. Park Renaissance Project	4356 30th Street	Cleanup Program Site	Closed
Glendale Fed Svngs Bank Proper	2856 El Cajon Boulevard	LUST	Closed
SEG Southwest State Grp AT0185	2800 El Cajon Boulevard	Cleanup program Site	Closed
Oil Changers #505	2448 El Cajon Boulevard	LUST	Closed
TP's Auto Repair	2426 El Cajon Boulevard	Cleanup Program Site	Closed
Golden State gas	2404 El Cajon Boulevard	LUST	Closed
Arco AM PM	2340 El Cajon Boulevard	LUST	Closed
Arco AM PM	2340 El Cajon Boulevard	Cleanup Program Site	Closed
2129 &2131 El Cajon Boulevard	2131 El Cajon Boulevard	Cleanup Program Site	Open
Am Prop – B	2040 El Cajon Boulevard	LUST	Closed
Am Prop – A	2010 El Cajon Boulevard	LUST	Closed
San Diego Stage & Lighting Co	2030 El Cajon Boulevard	LUST	Closed
Lusti Motors	1844 El Cajon Boulevard	LUST	Closed
University #2 Exxon	2405 University Avenue	Cleanup Program Site	Closed
Mission Restaurant	2801 University Avenue	LUST	Closed
Hontech Automotive Inc	4033 30th Avenue	LUST	Closed
La Boheme Condominiums	3959 30th Street	LUST	Closed
Iowa Street Senior Housing	3937 Iowa Street	Cleanup Program Site	Closed
Standard Oil	3152 University Avenue	LUST	Closed
Former AT&T	3180 University Avenue	Cleanup Program Site	Closed
Taylor Tire Co Inc	3202 University Avenue	Cleanup Program Site	Closed
Prestige Stations Inc #703	3205 University Avenue	LUST	Closed
Nutek Auto Repair	3231 University Avenue	Cleanup Program Site	Closed
Arco #9752 PSI	3255 University Avenue	LUST	Closed
University #1 Exxon	3252 University Avenue	LUST	Closed
University #1 Exxon	3252 University Avenue	Cleanup Program Site	Closed
Security Home Builders	3705 30th Street	LUST	Closed
Skelleys Garage	3040 Upas Street	Cleanup Program Site	Closed
M&H Performance Auto Center	3302 32nd Street	LUST	Closed
The Boulevard at North Park	2030 El Cajon Boulevard	Cleanup Program Site	Open
Source: GeoTracker, May 2016. See Appendix L.			

6.14.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed North Park CPU and associated discretionary actions, a

significant health and safety impact would occur if implementation of the proposed North Park CPU and associated discretionary actions would:

1) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands;

2) Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;

3) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;

4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment;

5) Expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operational accidents.

6.14.3 Impact Analysis

Issue 1 Wildfire Hazards

Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The City of San Diego receives limited precipitation; therefore, the potential for wildland fires represents a hazard, particularly on undeveloped properties or where development exists (or would potentially exist in the future) adjacent to open space or within close proximity to wildland fuels. As the proposed North Park CPU and associated discretionary actions would maintain natural open space within undeveloped canyons, any development adjacent to this open space would be subject to a risk of fire hazards. Existing City policies and regulations would help reduce, but not eliminate, risks from wildfires. The City's General Plan contains goals to be implemented by the City's Fire-Rescue Department, and sustainable development and other measures aimed at reducing the risks of wildfires.

The proposed North Park CPU Public Facilities, Services and Safety Element includes policies intended to reduce the risk of wildfire hazards. Policies are included that would prioritize the maintenance of a high level of fire protection throughout the community, particularly in the neighborhoods adjacent to natural open space and would emphasize modernization and/or replacement of facilities and equipment to meet the needs of the community or as newer firefighting technology becomes available. Policies would also support efforts by the City to educate and inform the community regarding fire prevention techniques, particularly those related to brush management and wildland fires.

Regulations regarding brush management are summarized in Chapter 5.0, Regulatory Framework (Section 5.14) of this PEIR. Future development proposals would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards, including brush management regulations. Impacts due to wildland fires would be less than significant and no mitigation is required.

Issue 2 Schools

Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

A GeoTracker search was undertaken (May 2016) to determine what, if any, exposure to hazardous materials occurs within one-quarter-mile of the existing schools. Seven schools are located within the North Park community:

- Garfield Elementary (K-5) located at 4487 Oregon Street
- Jefferson Elementary (K-5) located at 3370 Utah Street
- McKinley Elementary (K-5) located at 3045 Felton Street
- North Park Elementary (K-5) located at 4041 Oregon Street
- St. Patrick's School (K-8) located at 3014 Capps Street
- Academy of Our Lady of Peace (9-12) located at 4860 Oregon Street
- St. Augustine High School (9-12) located at 3266 Nutmeg Street

The GeoTracker search identified four hazardous materials sites in the North Park CPU area which fall within one-quarter-mile of four of the community schools. Cleanup on all four sites is complete, and all four are marked as closed (see Appendix L for detailed GeoTracker site information). The four identified, and closed sites include Skelley's Garage is located near Jefferson Elementary School and St. Patrick's School; Security Home Builders near St. Patrick's School; Mission Restaurant near North Park Elementary; and Henry's Garage near Academy of Our Lady of Peace.

There are only two "open" sites within the North Park CPU area, and neither are within one-quarter-mile of any schools. Nonetheless, in accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at such sites until a "no further action" clearance letter from the County DEH, or similar determination is issued by the City's Fire Rescue Department, DTSC, RWQCB, or other responsible agency. The current regulatory environment of City, state, and federal requirements provides a high level of protection from new hazardous uses that may be sited near schools or other sensitive receptors. Additionally, existing conditions in the North Park CPU area show no conflict between existing school sites and open hazardous materials sites. Therefore, the impact would be less than significant.

Issue 3 Emergency Evacuation and Response Plans

Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

There are no objectives or policies contained in the proposed North Park CPU and associated discretionary actions that would interfere with or impair implementation of an adopted emergency response or evacuation plan. The Unified San Diego County Emergency Services Organization Operational Area Emergency Plan, Annex Q, Evacuation (County of San Diego 2007) identifies a broad range of potential hazards and a response plan for public protection. The plan identifies major interstates and highways within the County as primary transportation routes for evacuation. The land uses identified in the proposed North Park CPU and associated discretionary actions would not physically interfere with any known adopted emergency plans. Improved roadway and transportation modifications discussed in Section 6.3, Transportation/Traffic Circulation/Parking, would directly help traffic flow and evacuation time.

The City will continue to make regular modifications to the Multi-Hazard Functional Plan and EOC as hazards, threats, population and land use, or other factors change to ensure impacts to emergency response plans are less than significant (City of San Diego 2008). Impacts to emergency response plans as a result of implementation of the proposed North Park CPU and associated discretionary actions would be less than significant.

Issue 4 Hazardous Materials Sites and Health Hazards

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment?

Hazardous materials are typically utilized by land uses such as industrial, retail/office, commercial, residential, agriculture, medical, and recreational uses, among other activities. According to a search of Federal, State, and local regulatory databases, 38 documented hazardous material release cases were identified within North Park, of which two are open, as shown in Table 6.14-1. Development of sites with existing contamination in accordance with the proposed North Park CPU and associated discretionary actions could potentially pose a hazard to the public or environment by placing sensitive receptors on, or adjacent to, known hazardous materials sites.

Federal and State regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. In accordance with local City and County, State, and Federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted at such locations until a "no further action" clearance letter from the County DEH, or similar determination is issued by the City's Fire Rescue Department, DTSC, RWQCB, or other responsible agency.

Because North Park does not historically have a large quantity of hazardous materials sites, and because the proposed Land Use Plan does not demonstrate a significant increase in land uses that

have potential to be hazardous materials sites, there are no policies in the proposed North Park CPU relative to hazardous materials. However, the General Plan includes policies to protect the health, safety and welfare of residents relating to industrial land uses, documentation of hazardous materials investigations, and requiring soil remediation in land use changes from industrial or heavy commercial to residential or mixed residential development. In addition, there are no major agricultural uses within the North Park CPU area. North Park is a built-out community located in the urbanized area of the City. Nominal amounts of pesticides and/or herbicides may be used by residents and other establishments for landscaping activities. These uses would not introduce significant risk of exposure to people in the North Park CPU area. Therefore, impacts related to hazardous materials sites and health hazards would less than significant.

Issue 5 Aircraft Related Hazards

Would the project expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operational accidents?

As concluded in Section 6.1, impacts relative to safety hazards for people residing in or working in a designated airport influence area would be less than significant. Additionally, there are no private airports or heliport facilities within or near the North Park CP. Thus, impacts related to exposure of people or structures to aircraft hazards would be less than significant.

Cumulative Impact Analysis

As discussed in this section, compliance with Federal, State, regional, and local health and safety laws and regulations would address potential health and safety impacts. Potential health and safety impacts associated with wildfire, hazardous substances, emergency response and evacuation plans, and aircraft hazards would not combine to create cumulative impacts when viewed together with the potential growth that could occur within the Golden Hill, North Park, and Uptown CPUs. Wildlife impacts in these communities are limited to the canyon areas which are localized and would not be exacerbated by cumulative development in adjacent communities. Additionally, future projects implemented in accordance with the CPUs are required to follow the City's Brush Management regulations and the City and Fire Code requirements. Similarly, potential hazards associated with hazardous material sites are site specific and would not combine with hazards in other CPU areas to create a cumulative impact. In addition, therefore, implementation of the proposed North Park CPU would not result in a cumulatively significant impact related to health and safety issues.

6.14.4 Significance of Impacts

Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and proposed North Park CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards. Additionally, future development would be subject to conditions of

approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazard would be less than significant and no mitigation is required.

The proposed North Park CPU and associated discretionary actions would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of and existing or proposed school. Impacts would be less than significant. No mitigation is required.

The proposed North Park CPU and associated discretionary actions would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts are less than significant, and no mitigation would be required.

Although there are closed LUST and Cleanup Program sites and two open Cleanup Program sites within the North Park community, there are local, State, and Federal regulations and programs in places that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites and no mitigation is required.

Impacts relative to safety hazards related to being located within an airport influence area less than significant. No mitigation is required.



Chapter 7
Environmental Analysis – Golden Hill

The following sections in Chapter 7 analyze the potential environmental impacts that may occur as a result of implementation of the proposed Golden Hill CPU and associated discretionary actions. The environmental issues addressed in this Chapter include the following:

- Land Use
- Visual Effects and Neighborhood Character
- Transportation/Circulation
- Air Quality/Odor
- Greenhouse Gas Emissions
- Noise
- Historical Resources
- Biological Resources
- Geologic Conditions
- Paleontological Resources
- Hydrology/Water Quality
- Public Service and Facilities
- Public Utilities
- Health and Safety

Each issue analysis section is formatted to include a description of existing conditions, the criteria for the determination of impact significance, evaluation of potential project impacts including cumulative impacts, mitigation measures if applicable, and conclusion of significance after mitigation for impacts identified as requiring mitigation.

7.1 Land Use

This section discusses existing land use and the consistency of the proposed Golden Hill Community Plan Update (CPU) and associated discretionary actions with applicable plans and regulations. This section analyzes the potential that implementation of the Golden Hill CPU would permit designation or intensity of use that have indirect or secondary environmental impacts.

7.1.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

Existing Land Use

As discussed in Chapter 2.0, Environmental Setting, the Golden Hill CPU area is developed with a variety of urban land uses. Golden Hill is an urbanized community consisting of approximately 745 acres (inclusive of streets and freeway right-of-way). Golden Hill is predominantly a residential community (371 acres or approximately 50 percent of the total acres within the community) with commercial (22 acres or less than one percent of total acres within the community) and institutional (9 acres or less than one percent of total acres within the community) uses providing a support function, although more recently commercial businesses attract from a broader area. Roads, freeways, and transportation facilities comprise approximately 291 acres, or 39 percent of the total acres within the community. The community has very little vacant land so new development opportunities will involve redevelopment or reuse of existing sites. The existing land uses are reflective of the land use recommendations of the 1988 Community Plan and distributed as depicted in Figure 7.1-1 and discussed below.

a. Residential

Residential land use forms the basis of the Golden Hill community. The age, type, and tenure of the community's housing stock allows for a wide range of income and lifestyle choices. There is a wide variety of housing types largely due to the relatively long pre-World War II building period as well as a sustained period of apartment construction during the latter half of the 20th century reflecting various trends in building densities, unit configurations, and provision of amenities. Pre-war housing often features a higher level of craftsmanship and includes single-family homes with a broad range of sizes, and duplexes and apartments at an appropriate scale for their neighborhood or where they feature prominently on corner lots. Post-war housing is largely multi-family and reflects modernist principles of efficient use of space, minimal ornamentation, and greater accommodation of the automobile.

Map Source: SanGIS



FIGURE 7.1-1
Land Uses under Adopted Community Plan – Golden Hill

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In general, the southern and western ends of the Golden Hill CPU area are characterized by a more diverse built environment, while the northeastern section – which encompasses South Park – has retained a cohesive collection of the community's early housing. Most of the homes have also retained their traditional architecture and human scale.

b. Commercial and Employment

Commercial land uses typically serve to support residential and other land uses by providing needed or desired goods and services, or function independently as employment generators. Golden Hill is predominantly a residential community in which the commercial districts provide a support function.

Beyond these fundamental characteristics, commercial land uses provide a focused area for community activity and identity. However, some commercial uses can have unwanted spillover effects on adjacent residential neighborhoods, particularly those that sell alcohol if not properly located and managed.

The community's existing commercial development pattern is in large part due to the development of the streetcar in the early twentieth century. Commercial development is concentrated along former streetcar routes. There are four main commercial districts: 25th Street, 28th and B Street, Beech and 30th Streets, and Fern Street between Grape and Juniper Streets (Figure 7.1-2).

There are also single commercial uses interspersed within residential neighborhoods, many of which are also designated and zoned residential. These uses are often within commercial buildings that are not easily converted to residential use, and the associated businesses can be an established part of the surrounding neighborhood. This overall fine-grained pattern typifies development prior to widespread use of the automobile and is advantageous to residents who cannot, or prefer not to drive. Provision of walkable neighborhood-serving retail establishments provides a convenient and more socially equitable alternative to conventional auto-oriented retail formats.

c. Institutional

Institutional uses provide either public facilities or private facilities or uses that serve a public benefit. These uses may serve the community or a broader area. Typically, the larger or more significant public uses such as schools and fire stations are identified on the land use map. Major institutional land uses within the community consist mainly of Fire Station 11 and several public and private schools. Additional institutional uses include religious facilities, charter schools, and social service providers.

d. Parks and Open Space

Parks and open space fulfill a variety of important purposes in the community including active and passive recreation, conservation of resources, protection of views, and visual relief from urbanization. Designated open space within the Golden Hill community consists of natural areas concentrated in undeveloped canyons within the eastern portion of the community. The proposed

Map Source: SanGIS

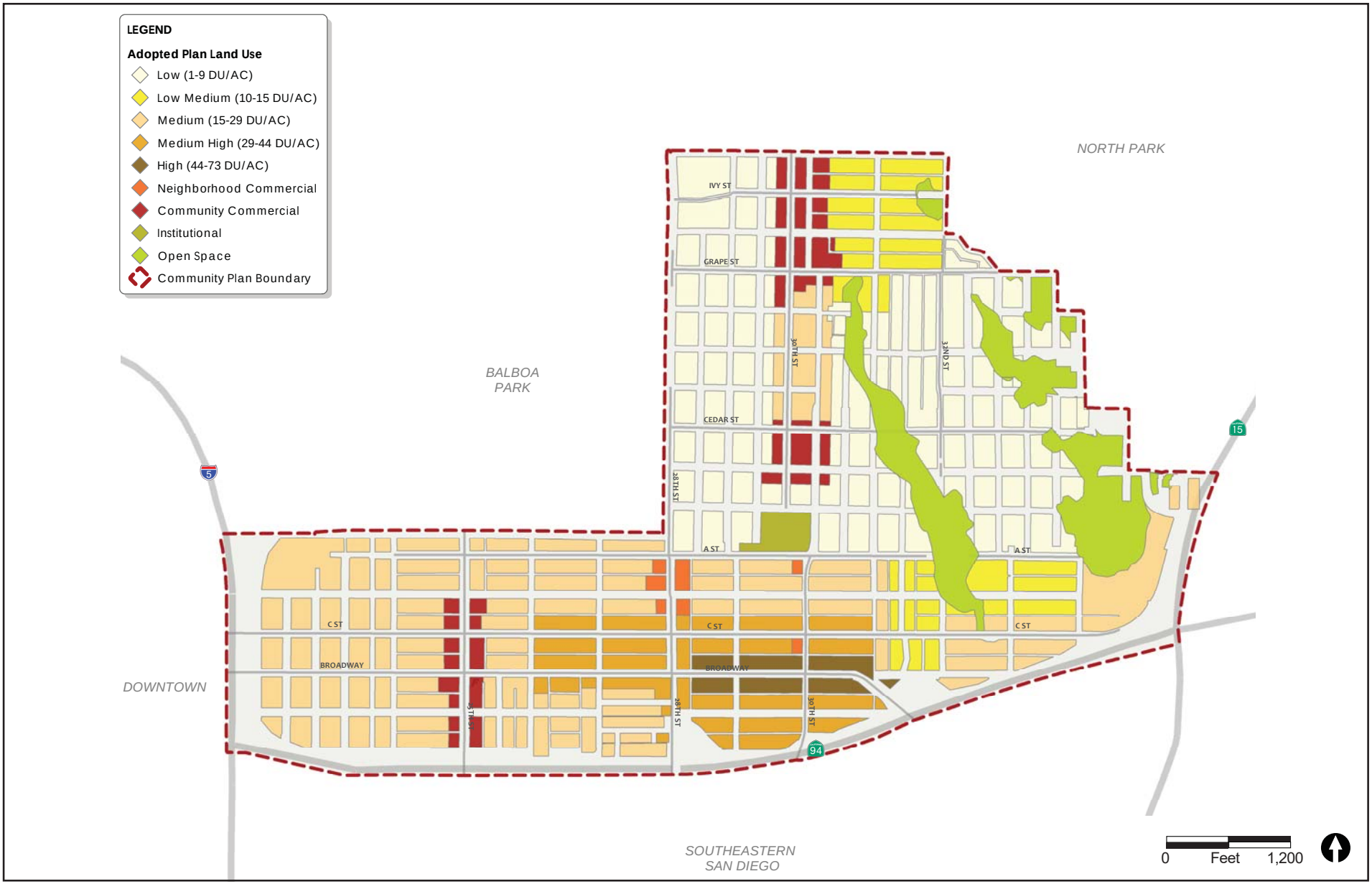


FIGURE 7.1-2
Commercial Districts – Golden Hill

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Golden Hill CPU's policies intend open space to be generally free from development or, where development is permissible, may be developed with limited, low-intensity uses in a manner that respects the natural environment and conserves sensitive environmental resources.

Protection of resources within lands designated as open space affects multiple property owners (including the City of San Diego) and is accomplished primarily through application of various development regulations of the Municipal Code, particularly the Environmentally Sensitive Lands (ESL) Regulations. The City has also pursued acquisition of private parcels or acquisition of easements as a means of conserving open space resources and protecting environmentally sensitive areas from development.

Table 2-2 in the proposed Golden Hill CPU provides the acreage of land area covered by land use category for the existing conditions. Descriptions of the categories from the City's General Plan Land Use and Community Planning Element (Table LU-4) that are applicable to the Golden Hill community are presented in Table 2-3 General Plan Land Use Designations. Application of these categories for consistency with the General Plan Land Use and Community Planning Element is accomplished with approval of individual CPUs.

e. Neighborhoods Centers/Villages

Neighborhood centers identified for Golden Hill are mixed-use activity areas that are pedestrian-friendly, centers of community life and linked to the public transit system. The community's existing commercial districts provide the needed mixed-use environment within the primarily residential community as well as the proximity to transit lines. Of these, the areas including and surrounding the 25th Street commercial district in Golden Hill and the 30th Street transit corridor are prominent enough to be identified as neighborhood centers and fulfill the objectives of the General Plan's City of Villages Strategy (Figure 7.1-3).

Adopted Golden Hill Community Plan

The adopted Golden Hill Community Plan (1988) covers approximately 441 acres (excluding public rights-of-way). The adopted Community Plan provides more detailed land use, design, roadway, and implementation information than what is found at the General Plan level. The adopted Community Plan identifies key issues in the community and enumerates a set of goal to achieve the community's vision. Specific objectives and recommendations to implement the adopted Golden Hill Community Plan are contained in its elements: Residential, Urban Design, Planned District, Historical/ Architectural Preservation, Commercial, Transportation, Parks and Recreation, Open Space, Community Facilities, Social Service, and Environmental Quality and Conservation. The adopted Golden Hill Community Plan would be replaced by the proposed Golden Hill CPU.

7.1.2 Significance Determination Thresholds

The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in environmental impacts considered significant under California Environmental Quality Act (CEQA). Thresholds used

Map Source: SanGIS

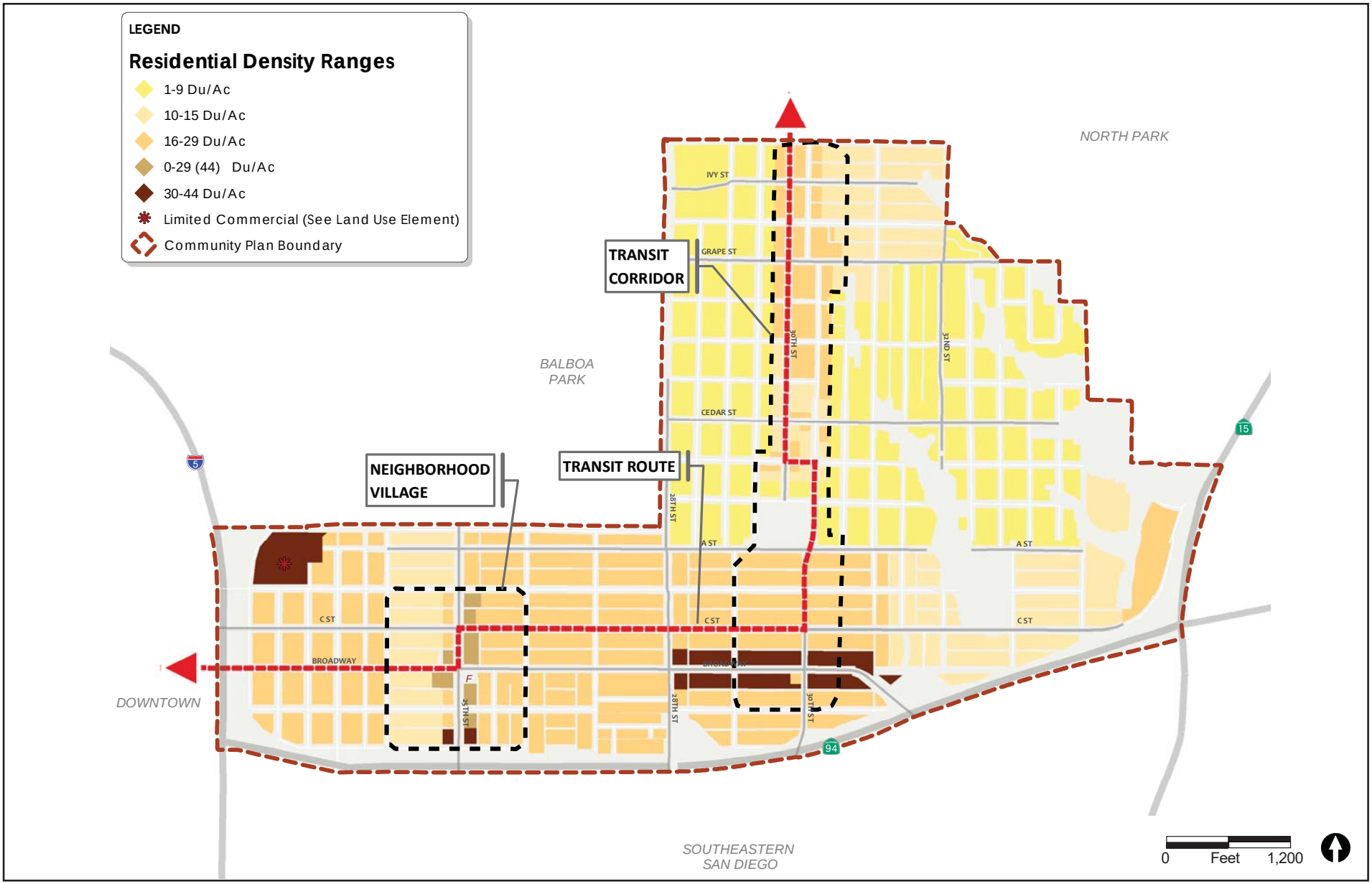


FIGURE 7.1-3
Neighborhood Centers/Villages – Golden Hill

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to evaluate potential impacts related to land use are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed North Park CPU. A significant land use impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary approvals would:

1) Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an indirect or secondary environmental impact;

2) Lead to development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community;

3) Conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan; or

4) Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).

Issues addressed in the City's CEQA Significance Thresholds that are not addressed in this document include whether the project would increase the base flood elevation for upstream properties, or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone. During initial project scoping it was determined that implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in significant impacts related to increases in the base flood elevation or construction in an SFHA or floodplain/wetland buffer zone because existing Land Development Code regulations would adequately address potential impacts related to grading within a SFHA (Municipal Code, Chapter 14, Article 2, Division 2 Drainage Regulations and Chapter 14, Article 3, Division 1 Environmentally Sensitive Lands Regulations. Thus, there is no further discussion of this issue area.

7.1.3 Impact Analysis

Issue 1 Conflicts with Applicable Plans

Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?

a. City Of San Diego General Plan

The proposed Golden Hill CPU and associated discretionary actions is intended to further express General Plan policies in the Golden Hill CPU area through the provision of site-specific recommendations that implement Citywide goals and policies, address community needs, and guide zoning. The CPU and General Plan work together to establish the framework for growth and

development for Golden Hill. The proposed Golden Hill CPU contains 10 elements, each providing neighborhood-specific goals and recommendations. These goals and recommendations are consistent with development design guidelines, other mobility and civic guidelines, incentives, and programs in accordance with the general goals stated in the General Plan.

Table 7.1-1 provides a comprehensive list of all proposed Golden Hill CPU policies for each element referenced in the following land use analysis. Additionally, a description of the proposed land use and allowed densities are included in Table 7.1-2; locations of proposed land uses are shown in Figure 7.1-4.

Table 7.1-1
Applicable CPU Policies Related to Land Use

Policy	Description
Physical Environment	
Physical Context	
LU-1.1	Provide a variety of land use types suitable for a predominantly residential community.
LU-1.2	Protect public health by evaluating the effects of noise and air pollution from airport operations and freeway traffic on community land uses and reduce or eliminate impacts on sensitive land uses (including housing, schools and outdoor athletic areas) through appropriate buffers, barriers and construction measures (also refer to Conservation Element Policy CE-3-1).
~~Central Operations Yard (20th Street & B Street/Delevan Drive~~Residential	
LU-2.1	Provide a diverse mix of housing types and forms consistent with allowable densities and urban design policies.
LU-2.2	Enable rental and ownership opportunities in all types of housing, including alternative housing types such as live/work studios and shopkeeper units.
LU-2.3	Support the continued use of existing small-scale housing units such as duplexes and companion units if visually cohesive within single-family neighborhoods.
LU-2.4	Preserve existing single-family homes and neighborhoods as a distinct housing choice in addition to their contribution to the historic character of the community.
LU-2.5	Provide design guidelines to protect the established older neighborhood character and scale.
LU-2.6	Design new residential development to complement the scale and architecture of other buildings within the same block. Where there is a mix of styles on the same block, maintain any shared characteristics such as setbacks, heights, rooflines and massing.
LU-2.7	Encourage rehabilitation of existing residential buildings that contribute to the character of Golden Hill, and in particular the historic districts in Golden Hill.
Lu-2.8	Central Operations Yard: Require a Planned Development Permit or similar discretionary permit for any redevelopment of the Central Operations Yard to residential use. Require and permit a maximum 10,000 square feet of commercial uses allowable under the zone applied (RM-3-7 zone).
Commercial & Employment	
LU-2.9	Preserve and expand the existing business base with an emphasis on local community ownership of businesses and/or the buildings they operate in.
LU-2.10	Promote new development that serves the retail, service and employment needs of local community residents.
LU-2.11	Discourage large retail format businesses when disruptive of fine-grained neighborhood character.
LU-2.12	Support the development of shopkeeper units and live/work units that allow residents to own and operate commercial uses.
LU-2.13	Retain small corner stores, provided that they serve and remain compatible with surrounding neighborhoods.

Table 7.1-1 Applicable CPU Policies Related to Land Use	
Policy	Description
LU-2.14	Enhance commercial districts by repair and refurbishment of adjacent streetscapes and also improving the appearance of existing storefront facades, including maintenance, restoration and rehabilitation of historic resources~~, as well as improving adjacent streetscapes~~.
LU-2.15	Encourage underdeveloped commercial lots to be developed with community amenities such as plazas and pocket parks where feasible.
LU-2.16	Ensure sidewalk maintenance as well as needed mobility and nighttime safety improvements occur within commercial districts and along associated neighborhood access routes.
LU-2.17	Increase the number of street trees and sidewalk furnishings where needed.
LU-2.18	Improve bicycle access to commercial districts by providing visible, convenient and secure bicycle parking facilities.
LU-2.19	Attenuate noise from non-residential uses to minimize spillover effects on adjacent residences.
LU-2.20	Provide commercial signs that are pedestrian-oriented in size and shape. Lettering and symbols should be simple and bold.
LU-2.21	Do not support drive-in or drive-thru development components within the community.
LU-2.22	Allow by Planned Development Permit residential densities up to 44 dwelling units per acre for a mixed-use development within the two parcels ~~zoned~~ designated ~~community~~ Community ~~commercial~~ Commercial ~~residential~~ Residential ~~permitted~~ Permitted at each corner of 25th Street and F Street.
Institutional	
LU-2.23	Evaluate use permits and other discretionary actions for institutional uses for appropriate development intensity and potential effects on visual quality and neighborhood character. Additional factors, such as those related to mobility, noise and parking demand should also be evaluated when applicable.
LU-2.24	Evaluate school sites considered for reuse or disposition by San Diego Unified School District for continued public use such as a park or community center.
Parks and Open Space	
LU-2.25	Preserve undeveloped canyons, hillsides, drainages and other natural features as important components of visual open space, community definition and environmental quality.
LU-2.26	Protect designated open space from development by securing public use where desirable, by obtaining necessary property rights through public acquisition of parcels or easements.
LU-2.27	Where development within open space may be permitted, restrict development to limited, low intensity uses located and designed in a manner that respects the natural environment and conserves ~~environmentally~~ Environmentally ~~sensitive~~ Sensitive ~~lands~~ Lands on-site as open space (also refer to Conservation Element policies CE-2.1 and 2.2).
LU-2.28	Utilize publicly controlled open space for passive recreation where desirable and feasible.
Neighborhood Centers/Villages	
LU-2.29	Provide public spaces within each neighborhood center/village (also refer to General Plan Policies UD-C.1, UD-C.5 and UD-E.1).
LU-2.30	Provide needed infrastructure and mobility improvements to increase transportation options within identified neighborhood centers/villages and along adjacent transit corridors.
~~Lu-2.31~~	~~Promote walkability and mobility for disabled persons within neighborhood centers/villages and between adjacent neighborhoods by addressing sidewalk condition, accessibility, and other infrastructure maintenance deficits.~~
Urban Design Element	
Block Patterns	
UD-2.1	Preserve the diversity of block configurations and grid pattern~~s and~~ street system ~~configurations which~~ as contributor~~s~~e to the distinct character of Golden Hill's neighborhoods ~~in the community~~.

Table 7.1-1
Applicable CPU Policies Related to Land Use

Policy	Description
Lot Patterns	
UD-2.5	Preserve and follow the community's traditional, small-scale and pedestrian-oriented development patterns. Maintain the scale and rhythm of the existing 50' lot widths prevalent in the community through development that is fine-grained, well-articulated and modest in bulk and massing.
Public Spaces and Gathering Spots	
UD-2.14	Provide public space and gathering spots within neighborhoods and commercial districts. These may take the form of plazas, pocket parks or linear parks, or enclosed space for community meeting and events.
Recreation Element	
Existing and Future Population-Based Parks and Recreation Facilities	
RE-1.~~3~~4	Encourage new private development proposals to include recreational facilities within the project site to serve existing, as well as new residents, in areas of the community where there are land constraints. Provision of park and recreation amenities should be considered on rooftops of buildings and parking structures, and/or on the ground level or within new buildings.
RE-1.~~6~~7	Encourage development of pocket parks and plazas within residential/mixed use developments, and clustered with other public facilities.
Conservation Element	
Environmentally Sensitive Lands	
CE-2.1	Follow applicable requirements of the Environmentally Sensitive Lands regulations, Biology Guidelines, and MSCP Subarea Plan for the protection, mitigation, acquisition, restoration, and management and monitoring of biological resources.
CE-2.2	Avoid grading of steep hillsides and other significant natural features. Where this is infeasible, minimize grading to the least sensitive portions of the site and design development to follow the natural landforms.
~~Air Quality and Health~~	
~~CE-3.1~~	~~Implement a pattern of land uses and street designs that foster walking and biking as modes of travel.~~
Historic Preservation Element	
Identification and Preservation of Historical Resources	
HP-2.1	Provide amendments to the Historical Resources Regulations of the Municipal Code for the protection of potential historic districts until such time as they can be intensively surveyed, verified, and brought forward for Historic Designation consistent with City regulations and procedures.
HP-2.2	Intensively survey and prepare nominations for the potential historic districts identified in the Golden Hill Historic Resources Reconnaissance Survey, and bring those nominations before the Historical Resources Board for review and designation. Prioritization of district nominations may occur in consultation with community members and stakeholders based upon a variety of factors, including redevelopment pressures and availability of resources.

Table 7.1-2
Golden Hill Community Plan Land Use Designations

General Plan Land Use	Community Plan Designation	Specific Use Considerations	Description	Intensity	
				Residential Density (dwelling units/acre)	Floor Area Ratio (FAR)
Park, Open Space, and Recreation	Open Space	None	Provides for the preservation of land that has distinctive scenic, natural or cultural features; that contributes to community character and form; or that contains environmentally sensitive resources. Applies to land or water areas that are undeveloped, generally free from development, or developed with very low-intensity uses that respect natural environmental characteristics and are compatible with the open space use. Open Space may have utility for: primarily passive park and recreation use; conservation of land, water, or other natural resources; historic or scenic purposes; visual relief; or landform preservation.	0-1	Limited[1]
	Population-based Parks	None	Provides for areas designated for passive and/or active recreational uses, such as community parks and neighborhood parks. It will allow for facilities and services to meet the recreational needs of the community as defined by the Community Plan.	None	Limited
Residential	Residential - Low	None	Provides for single-family housing at various densities within stated range and limited accessory uses.	1 - 9	Varies by Zone Applied
	Residential - Low Medium	None	Provides for both single-family and multi-family housing.	10 - 15	0.75 FAR
	Residential - Medium	None	Provides for both single-family and multi-family housing at various densities within stated range.	16 - 29	Varies by Zone Applied
	Residential - Medium High	None	Provides for multi-family housing within a medium-high-density range. Limited commercial use allowed by zone applied but not required.	30 - 44	1.80 FAR
Commercial Employment, Retail & Services	Neighborhood Commercial	Residential Permitted	Provides local convenience shopping, civic uses, and services serving an approximate three mile radius. Housing may be allowed only within a mixed-use setting.	0-29	1.00 FAR/ 1.75[2]
	Community Commercial	Residential Permitted	Provides for shopping areas with retail, service, civic, and office uses for the community at-large within three to six miles. Housing may be allowed only within a mixed-use setting.	0-29	1.00 FAR/ 1.50[2]
				0-44[3]	2.00[3] FAR
Institutional, Public and Semi-Public Facilities	Institutional	None	Provides a designation for uses that are identified as public or semi-public facilities in the Community Plan and which offer public and semi-public services to the community. Uses may include but are not limited to: communication and utilities, transit centers, schools, libraries, police and fire facilities, post offices, park-and-ride lots and government offices.	None	Varies[4]

[1]Refer to Policy LU-2.27.
[2] Maximum FAR available with residential mixed-use.
[3]Maximum FAR available with residential mixed-use (also refer to Policy LU-2.8 and 2.22).
[4]Refer to Policy LU-2.23.

Map Source: SanGIS



FIGURE 7.1-4
Community Plan Proposed Land Use – Golden Hill

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The **Land Use Element** of the proposed Golden Hill CPU contains community-specific policies to guide development within the Golden Hill community. This element establishes the distribution and pattern of land uses throughout the community along with associated residential densities.

Golden Hill is a community with an established land use pattern that is expected to remain. The community has a unique level of complexity due to its long-standing and diverse development history; varied geography; and proximity to Balboa Park and Downtown. Policies within the Land Use Element are constructed to promote the overall land use goals of the proposed Golden Hill CPU, which include residential goals such as provision of a variety of housing options and the retention of the historic character and scale. Commercial goals include fostering active commercial districts with local ambiance that serve as community activity areas. The Land Use Element also contains goals relative to the preservation of undeveloped canyons as open space and the consideration of social equity and environmental justice in land use and planning decisions. As such, the proposed Golden Hill CPU would be consistent with the General Plan goal of providing diverse and balanced neighborhoods and communities, and also acknowledges the goal for addressing environmental justice in the Golden Hill community. The land use plan prepared for the proposed Golden Hill CPU provides for a combination of land uses, which emphasize the existing diversity of the community, as well as a diversity that supports future growth and prosperity within the plan area.

The existing development within Golden Hill provides a foundation for achievement of the goals laid out in the General Plan Mobility Element due to the urban character of the community, existing transit connections, and adjacency to major roadways and interstates. The proposed Golden Hill CPU **Mobility Element** policies support the development of multi-modal facilities along major roadways ,and emphasize a safe and interconnected bicycle network. The proposed Golden Hill CPU also includes guidance for efficient use of parking resources through parking management strategies in commercial areas and transit corridors to reduce costs associated with providing parking and reduce parking impacts while supporting local businesses.

The **Urban Design Element** of the proposed Golden Hill CPU supports and implements the General Plan at the Community Plan level by including specific design guidelines and policies for the proposed Golden Hill CPU area that are consistent with goals related to the community's existing and projected neighborhood character. The proposed Golden Hill CPU contains policies that are intended to improve the quality of life through high quality urban design that provides superior living and working environments and contributes positively to the public realm and in a manner that respects the natural environment. It addresses community and neighborhood design, including preservation of existing lot and block patterns, streetscape design, urban forestry and improved interfaces with freeways and Balboa Park. The Urban Design Element also addresses development design, including compatibility with community character and important design details and development features. Topic areas include preservation of public views, canyons hillsides and open space, orientation of buildings and parking areas, storefront design, and green building practices and sustainability. Additionally, the element contains goals and policies that specifically address the hills topography and canyon landscape that defines much of Golden Hill.

The **Economic Prosperity Element** proposes an increase in small businesses that provide for job opportunities within the community. This element identifies the value of vibrant neighborhood

commercial districts where the residents purchase a significant share of their basic needs and services within the community.

Consistent with the Public Facilities, Services, and Safety Element of the General Plan, the proposed Golden Hill CPU **Public Facilities, Services, and Safety Element** also includes goals to provide and maintain infrastructure and public services for future growth without diminishing services to existing development. Specific goals and policies related to public schools include maximizing utilization of school facilities while eliminating overcrowding and private initiative to enhance educational opportunities. Additionally, this element recognizes that school facilities may be used during non-school hours for educational, recreational, and cultural purposes.

The proposed Golden Hill CPU also provides **Recreation Element** policies that supplement the General Plan. Strategies to reduce the existing parkland deficit in the plan area are included in the Recreation Element with a special effort to locate new parkland within the community, in addition to park equivalencies within Balboa Park, promoting connectivity, safety, public health, and sustainability. Policies to provide for preservation, protection, and enhancement of planned parkland facilities are also included. At full community development, the proposed Golden Hill CPU would be deficit approximately nineteen acres in population-based park space. Impacts related to parkland deficits are addressed in Section 7.12, Public Services and Facilities. The proposed Golden Hill CPU Recreation Elements include community-specific policies addressing park and recreation guidelines, preservation, and accessibility.

The proposed Golden Hill CPU is consistent with the conservation policies contained within the Conservation Element of the General Plan. The **Conservation Element** of the proposed Golden Hill CPU addresses the conservation goals and policies that can be effective in managing, preserving, and thoughtfully using the natural resources of the community. Climate change and sustainable development/design is extensively addressed in a manner consistent with the General Plan within both the Urban Design Element and Conservation Element. Sustainable energy policies are included which promote development that qualifies for the City's Sustainable Buildings Expedite Program; educate residents and businesses on efficient appliances and techniques for reducing energy consumption; provide for, or retrofit, lighting in the public rights-of-way that is energy efficient; and provide information on programs and incentives for achieving more energy-efficient buildings and renewable energy production.

With respect to the General Plan policies concerning noise and land use compatibility, the **Noise Element** of the proposed Golden Hill CPU includes goals and policies to guide compatible land uses and require the incorporation of noise attenuation measures for new uses.

The City of San Diego's General Plan Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources. The Golden Hill community is one of the oldest urban neighborhoods in San Diego. The **Historic Preservation Element** of the proposed Golden Hill CPU provides policies to preserve significant historical resources. This element calls for the identification and preservation of significant historical resources, as well as educational opportunities and incentives relative to historical resources in Golden Hill. Impacts relative to historical resources are discussed in Section 7.7, Historical Resources.

As part of the proposed project analyzed within this Program Environmental Impact Report (PEIR), the City is updating the Impact Fee Study (IFS; formerly Public Facilities Financing Plan) for the Golden Hill community, which was originally adopted in 2004. The IFS sets forth the major public facilities needs specific to the Golden Hill community with respect to transportation (streets, storm drains, traffic signals, etc.), libraries, park and recreation facilities, and fire stations, as necessary. The proposed Golden Hill CPU is a guide for the future development within the community and serves to determine public facility needs. Revisions to public facility needs, Development Impact Fees (DIFs), or other capital improvement programs, would be included in the updated IFS.

The proposed Golden Hill CPU and associated discretionary actions are consistent with the General Plan and the City of Villages strategy. Furthermore, the policies developed for the proposed Golden Hill CPU associated with each of the elements were drafted in a manner that is consistent with the General Plan. Thus, impacts related to plan consistency would be less than significant.

b. Land Development Code Regulations

Implementation of the actions associated with adoption of the proposed Golden Hill CPU would include several Land Development Code amendments described in Sections 3.4.2 and 3.4.3 of Chapter 3, Project Description. Specific actions include repealing the Golden Hill Planned District Ordinance (PDO), adopting Citywide zoning and zoning amendments through a rezone, and adoption of supplemental development regulations within the Historical Resources Regulations of the Municipal Code. The proposed PDO/Citywide zone conversions are shown in Table 3-5.

Application of existing, new, or modified zones would accommodate existing development, encourage new projects consistent with community goals and character, and implement mixed-use development consistent with the General Plan goals and policies.

c. ESL Regulations

As discussed above, environmentally sensitive lands (e.g., sensitive biological resources, steep hillsides, historical resources) occur within the proposed Golden Hill CPU area. Any future development proposed on environmentally sensitive lands would be subject to the City's ESL Regulations (Chapter 14, Article 3, Division 1), which require that future projects demonstrate that the proposed development site is physically suitable for the proposed use and that it would minimize disturbance to natural landforms and not increase flood hazards. In the event a future specific project is considered for an ESL Regulations deviation, supplemental findings would be required prior to approval in order to show that development would not result in an additional public safety threat or extraordinary public expense, or create a public nuisance. Adherence to these regulations would avoid significant impacts to environmentally sensitive lands within the proposed Golden Hill CPU area.

d. San Diego Forward – The Regional Plan

The proposed Golden Hill CPU land use scenario would be consistent with the goals of San Diego Forward – the Regional Plan (San Diego Forward), prepared by San Diego Association of Governments (SANDAG), through the designation of a high-density mixed-use village. In addition,

the proposed Golden Hill CPU proposes to establish pedestrian-oriented, urban, and mixed-use community villages that would reduce reliance on the automobile and promote walking and use of alternative transportation. Policies contained within the proposed North Park CPU Land Use and Mobility Elements serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. These measures are consistent with San Diego Forward's smart growth strategies. The adoption and implementation of the proposed Golden Hill CPU and associated discretionary actions would not generate any conflict or inconsistencies with San Diego Forward – the Regional Plan; therefore, potential impacts would be less than significant.

Issue 2 Conversion of Open Space or Farmland

Would the proposed project lead to the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use?

The proposed project involves an update to the Golden Hill Community Plan, a fully built-out community in the City of San Diego, and other associated discretionary actions. The current makeup of the urbanized Golden Hill CPU area includes a mix of land uses that includes open space but no farmland. The siting of mixed uses in proximity to each other, the provision of enhanced pedestrian corridors and bicycle amenities, and the planned changes to the street network would additionally serve to foster community connectivity rather than create division.

Goals of the proposed Golden Hill CPU Land Use and Mobility Elements that address community connectivity include supporting a vibrant, pedestrian-oriented community village within the proposed Golden Hill CPU area that provides diverse housing opportunities and encourages quality neighborhood and community-supporting institutional and commercial uses. Overall, incorporation of the goals and recommendations of the elements contained in the proposed Golden Hill CPU would enhance community connectivity. In addition the Golden Hill Conservation Element contains polices that preserve open space within the Community Plan area. Therefore the implementation of the proposed Golden Hill CPU and other associated discretionary actions would not lead to the development or conversion of identified open space or physically dividing the community and would not result in any policies that would physically divide adjacent communities. Thus, impacts related to conversion of open space or farmland would be less than significant and no mitigation would be required.

Issue 3 Conflicts with the MSCP Subarea Plan

Would the project conflict with the provision of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

The highly urbanized planning area lies within the City's MSCP Subarea Plan and contains preserve areas designated as Multi-Habitat Planning Area (MHPA) in the northern portion of the project area. ESL Regulations would apply within the Golden Hill CPU area that would limit development encroachment into sensitive biological resources. As concluded in Section 7.8 of this PEIR, the proposed Golden Hill CPU and other associated discretionary actions would be consistent with the MSCP Subarea Plan, and impacts would be less than significant.

Issue 4 Conflicts with an Adopted ALUCP

Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

The project site is located within San Diego International Airport's (SDIA) Airport Influence Area (AIA). The AIA is "*the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses.*" To facilitate implementation and reduce unnecessary referrals of projects to the Airport Land Use Commission, the AIA is divided into Review Area 1 and Review Area 2. The project site is located within Review Areas 1 and 2 (Figure 7.1-5). The composition of each area is determined as follows:

- Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSSs). All policies and standards apply within Review Area 1.
- Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

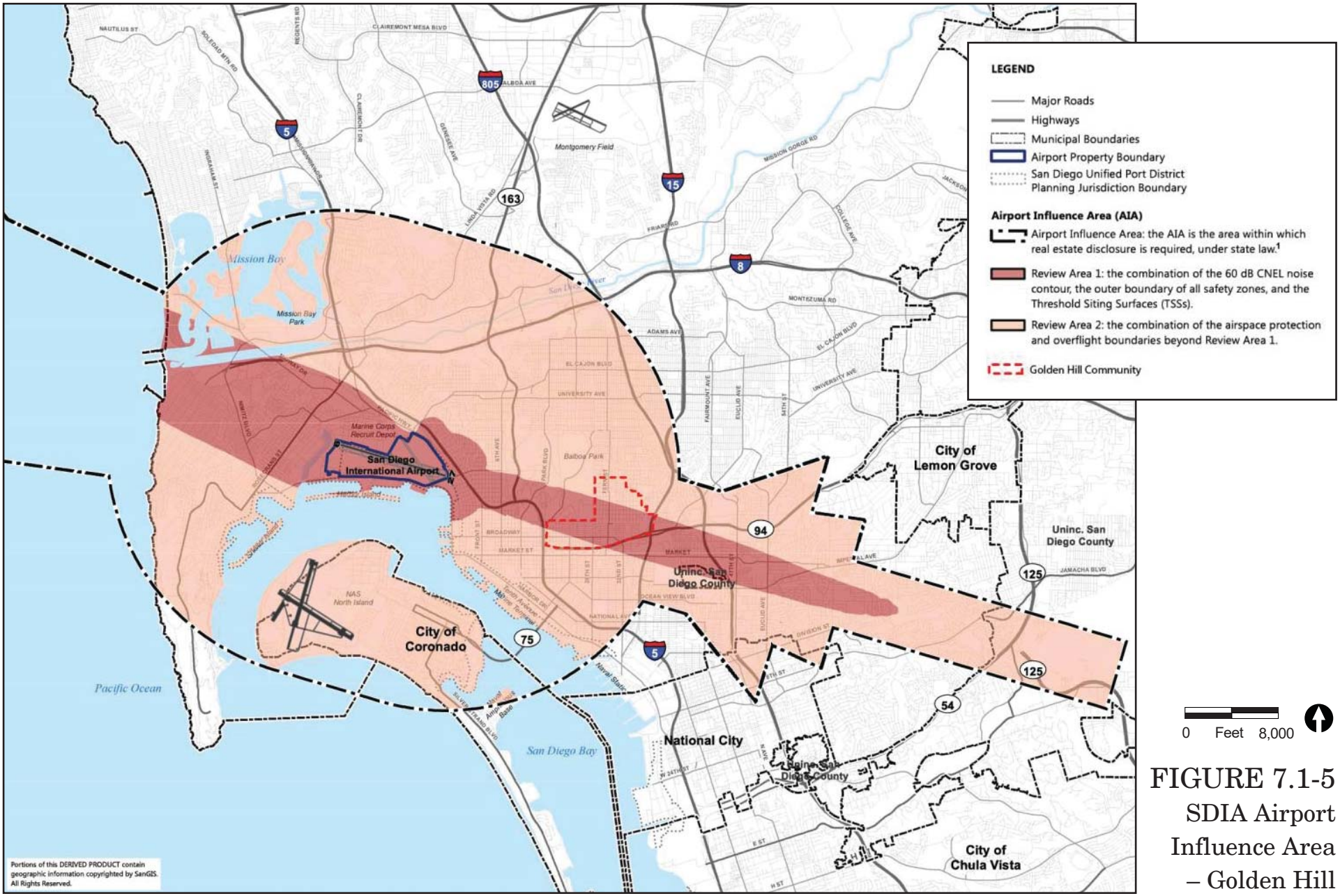
The ALUCP contains four principal compatibility concerns: noise (exposure to aircraft noise), safety (land use factors that affect safety both for people on the ground and occupants of aircraft, airspace protection (protection of airport airspace), and overflight (annoyance or other general concerns related to aircraft overflights). The southeastern-most tip of the Golden Hill community is located outside the community noise equivalent level (CNEL) noise contours for SDIA (Figure 7.1-6). Noise impacts are fully evaluated in Section 7.6, Noise, of this EIR. As discussed in Section 7.6, the proposed Golden Hill CPU would not result in impacts to existing uses because the CPU would not result in a change to these existing uses or a change in SDIA operations. Because future development is required to provide noise attenuation consistent with the Noise Element of the General Plan and the ALUCP for the San Diego International Airport and follow procedures in the Municipal Code, implementation of the Golden Hill CPU would result in a less than significant exposure to noise from aircraft.

The Golden Hill community is not located within any Safety Compatibility Zones (Figure 7.1-7). Safety compatibility standards of the ALUCP provide maximum residential density and nonresidential intensity limits that are allowable within the safety zones.

The airspace protection boundary for SDIA establishes the area where the policies and standards of the ALUCP apply. The airspace protection boundary is based on the outermost edge of the following airspace surfaces:

- Part 77, Subpart B, 100:1 notification surface boundary
- Part 77 civil airport imaginary airspace surfaces
- The approach surfaces for both runway ends defined by the criteria in FAA Order 8260.3B, United States Standard for Terminal Instrument Procedures (TERPS)

Map Source: SDIA - ALUCP

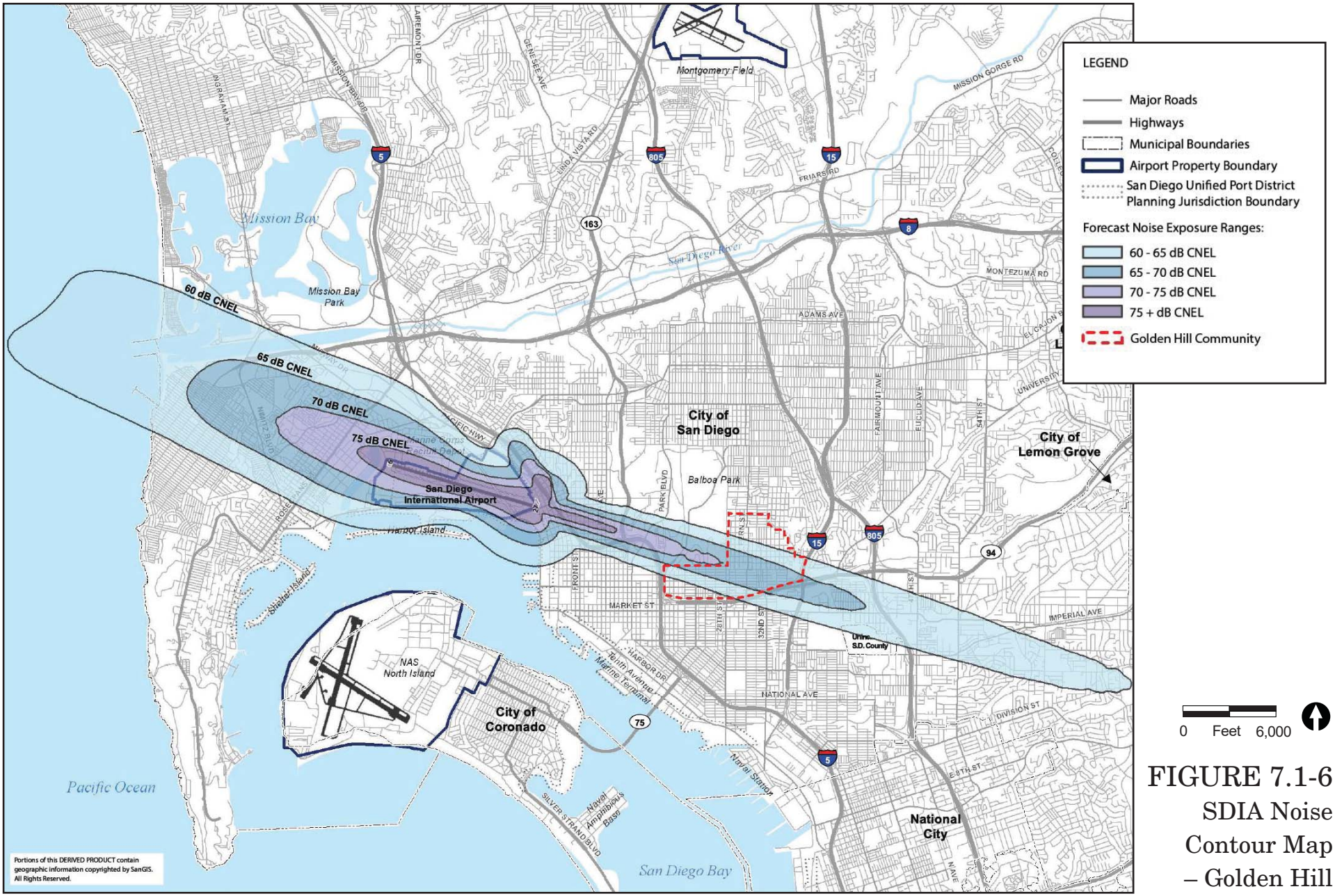


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FIGURE 7.1-5
SDIA Airport Influence Area – Golden Hill

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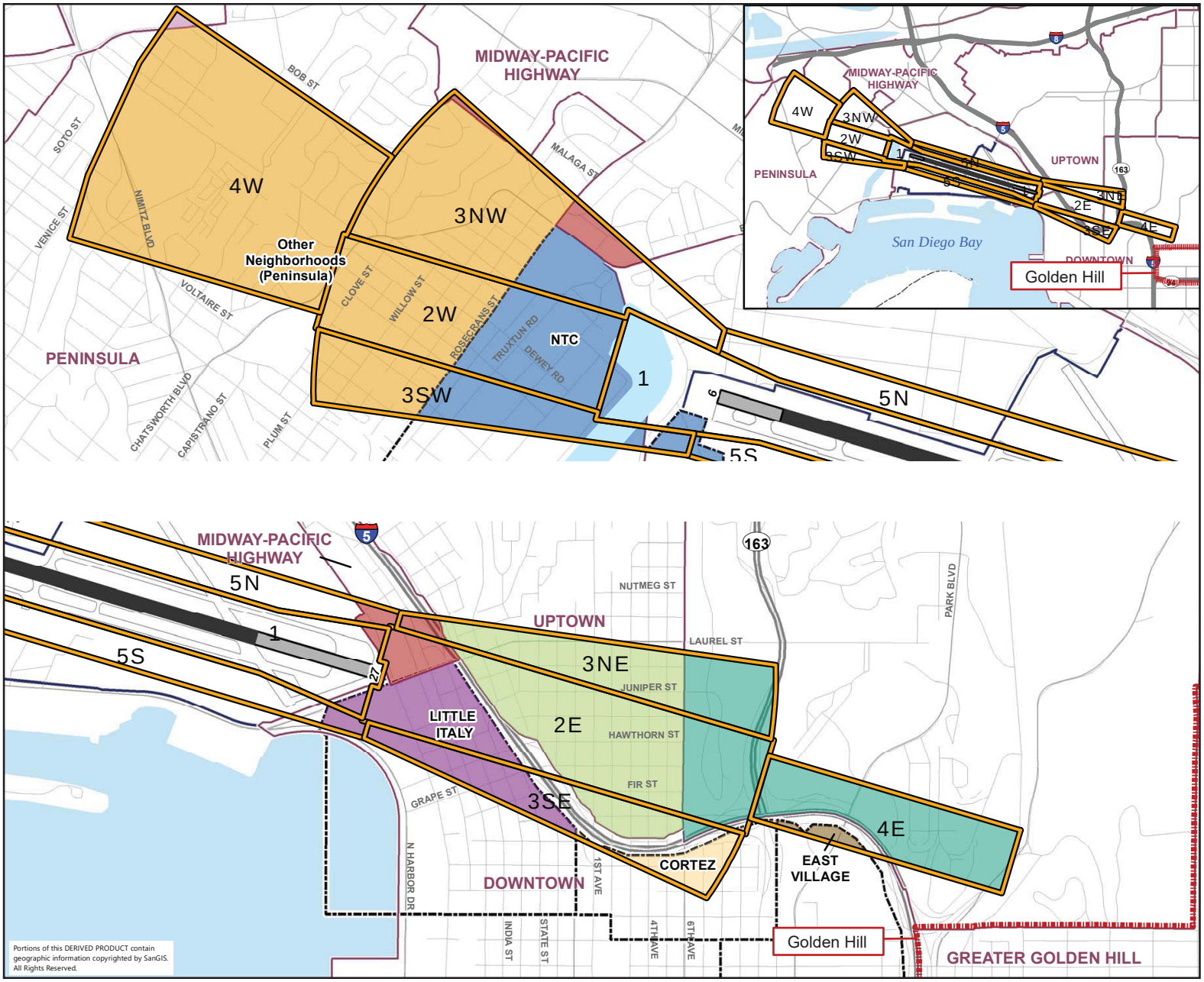
Map Source: SDIA - ALUCP



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FIGURE 7.1-6
SDIA Noise Contour Map – Golden Hill

Map Source: SDIA - ALUCP



LEGEND

- Major Roads
- Highways
- Community Planning Areas
- Airport Property Boundary
- Displaced Thresholds
- Safety Compatibility Zone
- Neighborhood Boundaries
- Balboa Park
- Downtown – Cortez
- Downtown – East Village
- Downtown – Little Italy
- Midway-Pacific Highway
- Ocean Beach
- Peninsula – NTC
- Peninsula – Other Neighborhoods
- Uptown

0 Feet 1,500

FIGURE 7.1-7
SDIA Safety Compatibility Zones – Golden Hill

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The Golden Hill community is located outside of the FAR Part 77 Notification Surfaces. Therefore, future projects would not be required to obtain a Federal Aviation Administration (FAA) Part 77 Letter of Non-Obstruction. As such, impacts to airspace protection are less than significant.

Overflight compatibility concerns apply to the Golden Hill CPU area, where the community is located within the Overflight Notification Area (Figure 7.1-8). An overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. The recordation of an overflight notification agreement is not necessary where the dedication of an avigation easement is required. Alternative methods of providing overflight notification are acceptable if approved by the Airport Land Use Commission. Future residential developments in the Golden Hill community that are located within the overflight area for SDIA would have to comply with this notification requirement. Thus, any impacts related to airport safety and compatibility would be less than significant.

Cumulative Impact Analysis

The proposed Golden Hill CPU contains 10 core elements that would provide community-specific goals and policies that are consistent with citywide zoning classifications, development design guidelines, mobility guidelines, incentives, and programs in accordance with the goals of the City's General Plan and the implementing regulations of the City's Land Development Code. Both the North Park and Golden Hill CPUs along with the Uptown CPU would accommodate existing development as well as encourage development consistent with community goals and character.

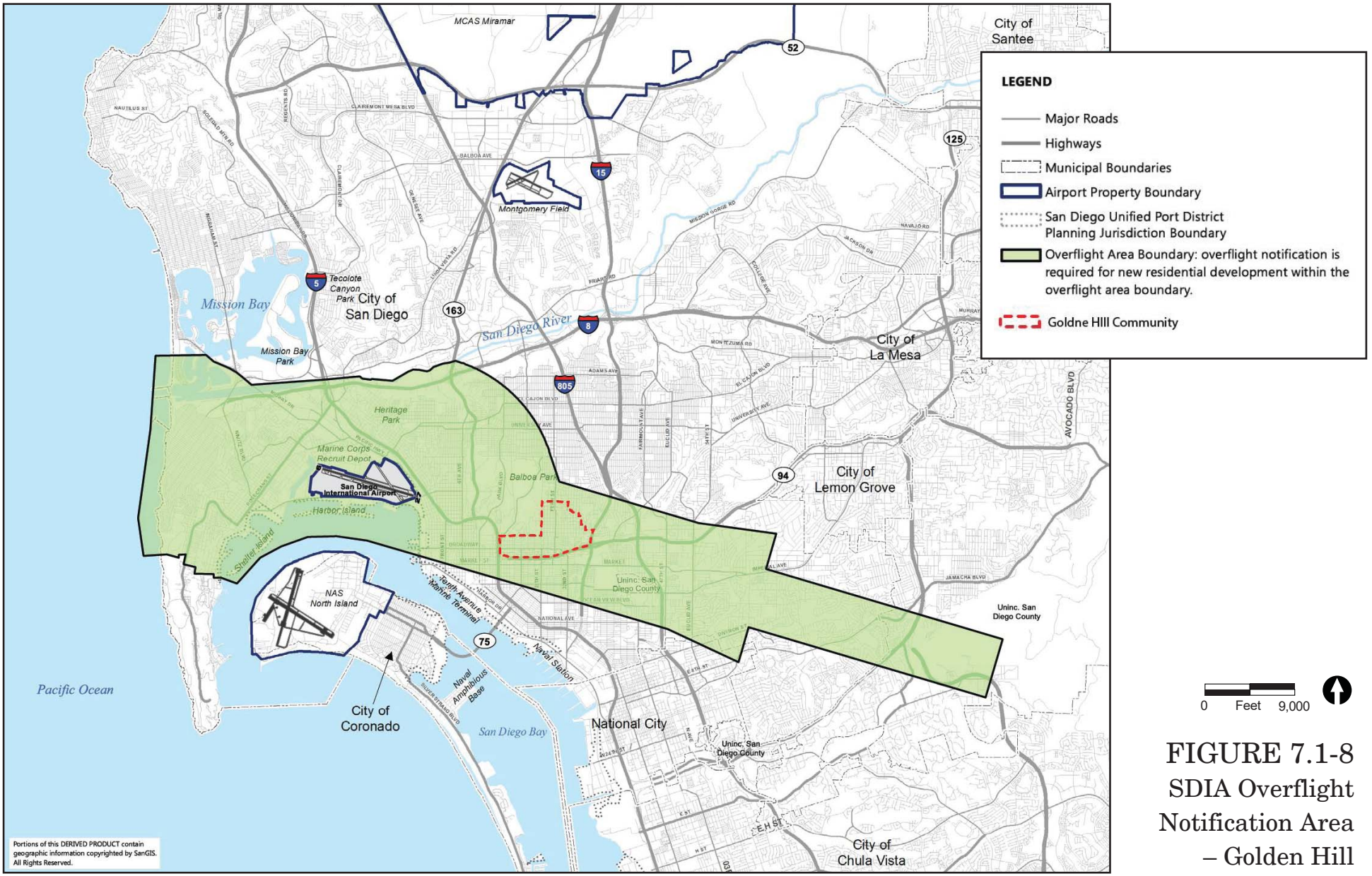
The two CPUs analyzed in this PEIR as well as the Uptown CPU would be consistent with and would implement the environmental goals and objectives of the SANDAG's San Diego Forward – The Regional Plan. Implementation of three CPUs would be consistent with the City's Multiple Species Conservation Program as any development in or near MHPA areas would be subject to ESL regulations. Development implemented in accordance with the North Park, Golden Hill, and Uptown CPUs and their associated discretionary actions would not result in conflicts with the City's ESL Regulations, as discussed in Sections 6.1 and 7.1 and in the Uptown PEIR, which contains policies supporting the goals of these regulations. Any development within the CPU areas that would encroach into ESL would be subject to review in accordance with the ESL Regulations (Land Development Code, Section 143.0101 et. seq.). The proposed Golden Hill CPU also contains measures to evaluate and ensure the consistency of future development with the ALUCP for the San Diego International Airport. Based on the compatibility of the proposed CPUs (North Park, Golden Hill, and Uptown) with the General Plan policy framework and other applicable land use plans and regulations, cumulative land use compatibility impacts associated with build out of the CPUs and their associated discretionary actions would be less than significant.

7.1.4 Significance of Impacts

Issue 1 Conflicts with Applicable Plans

As discussed in Section 7.1.3 above, under Issue 1, each element of the proposed Golden Hill CPU would be consistent with the General Plan and the City of Villages strategy. No conflicts with ESL regulations, the Land Development Code, or the San Diego Forward – the Regional Plan have been

Map Source: SDIA - ALUCP



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FIGURE 7.1-8
SDIA Overflight Notification Area – Golden Hill

identified. As the proposed Golden Hill CPU and associated discretionary actions would be consistent with applicable environmental goals, objectives, or guidelines of a General Plan, no indirect or secondary environmental impact would result and impacts would be less than significant. No mitigation is required.

Issue 2 Conversion of Open Space or Farmland

As discussed in Section 7.1.3 above, under Issue 2, the implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in the conversion of open space or farmland, because ESL regulations would protect open space and there is no farmland in the CPU area. Goals of the proposed Golden Hill CPU Land Use and Mobility Elements promote community connectivity. In addition, the Golden Hill Conservation Element contains polices that preserve open space within the Community Plan area. Therefore, the implementation of the proposed Golden Hill CPU, and other associated discretionary actions would not lead to the development or conversion of identified open space and would not physically divide the community. Impacts related to conversion of open space or farmland and physical division of the community would be less than significant.

Issue 3 Conflicts with the MSCP Subarea Plan

The proposed Golden Hill CPU with other associated discretionary actions implementation would not have significant impacts on the MHPA and the project would be consistent with the MSCP. Impacts would be less than significant and no mitigation is required.

Issue 4 Conflicts with an Adopted ALUCP

Although the Golden Hill community is within the SDIA AIA, the proposed Golden Hill CPU and associated discretionary actions would not result in any conflicts with the adopted ALUCP. Future projects would be required to receive Airport Land Use Commission consistency determinations, as necessary, which would ensure future projects are consistent with the SDIA ALUCP. As a result, the proposed Golden Hill CPU and associated discretionary actions would not result in land uses that are incompatible with an adopted Airport Land Use Compatibility Plan. Impacts would be less than significant and no mitigation is required.

7.1.5 Mitigation Measures

Land use impacts related to build out of the proposed Golden Hill CPU and associated discretionary actions would be less than significant. Thus, no mitigation is required.

7.2 Visual Effects and Neighborhood Character

This section addresses visual effects of the proposed Golden Hill CPU and associated discretionary actions, including potential for impacts on public views, neighborhood character, trees, landform alteration, and light and glare.

7.2.1 Existing Conditions

The existing regulatory framework is summarized in Chapter 5.0 and existing conditions for the Golden Hill CPU area are discussed below.

7.2.1.1 Existing Context and Urban Form

The composition of the natural environmental features, the grid street pattern, the distinctive architectural character, and connections to adjacent communities and resources defines the community's urban form and provides the design framework for the proposed Golden Hill CPU. Two qualities which make the community unique are the variety of older, traditional architectural styles and the sensitivity of the earlier site planning to the rolling terrain and canyon landforms. Many of the community's neighborhoods have a pedestrian orientation with a grid pattern of streets, low traffic volumes and mature trees. Growth has followed a traditional neighborhood development pattern, characterized by compact blocks, small lots and fine-grained, pedestrian-scaled and oriented buildings. Exceptions include more recent post-war apartment construction that introduced multiple lot consolidations, front facades that lack transparency, and driveways/parking oriented to the street and often featured prominently. However, many historically significant residential buildings and architectural styles still exist in the community and their character and scale are valued.

7.2.1.2 Built Form and Development

The community's built form consists mainly of residential development with several neighborhood-oriented commercial districts. In general, the southern and western ends of the planning area are characterized by a more diverse built environment of multi-family apartments and condominiums interspersed with single-family homes that represent traditional or historic architectural character. The northeastern section – which encompasses the South Park neighborhood – has retained a cohesive collection of the community's early single-family housing. Most single-family neighborhoods have retained their traditional architecture and human scale. The portion of the community south of A Street, largely planned and zoned for multi-family housing, contains a mix of single-family homes and multi-family developments of various sizes.

a. Traditional Block Patterns

A defining characteristic of Golden Hill is its diversity of block patterns and types (Figure 7.2-1) which contribute to a clear definition of neighborhoods and a highly walkable and connected street network. Generally, blocks are compact and follow a clear grid pattern, except where blocks meet the edges of canyons and freeways. The traditional block patterns within the Golden Hill CPU area are described below.

Downtown Blocks

Downtown Blocks are an extension of the block pattern of downtown that existed prior to the construction of the I-5 freeway. They are predominantly located in the South Park neighborhood and in the western-most section of Golden Hill west of 24th Street. They are typically 200 feet by 300 feet with 50-foot wide by 100-foot deep lots that can face in both the long and short directions of the block. This block type typically does not have an alley, although a slightly wider variation with an alley does appear in select locations. This block design is compact and affords a variety of lot configurations, which has enabled a diversity of building types to be built over the years. It allows a good amount of density, with an average of 12 lots per block and up to 17 lots in some locations. At the same time, the scale and character of development is mostly single- family. The combination of these development patterns makes the neighborhoods around them highly walkable and pedestrian-oriented.

Long Alley Blocks

Long Alley blocks are largely located south of A Street from 24th to 31st Streets, with some blocks clustered around the northeast section of the community. They measure a standard 300-foot wide by 600 feet, with some blocks as long as 700 feet and some half-blocks facing the park. The typical lot size is 50-foot wide by 140 feet deep. A rich diversity of lot configurations and dimensions exists with lots as small as 1,400 square feet. Many of the larger apartment complexes in the community are developed within this block type, as the length allows large lot consolidations, easy alley access, and a greater amount of diversity of building types and sizes. In the eastern neighborhoods, single-family lots dominate this block type. While the pattern of development is fine grained in many locations, the length of this block type provides a challenge to walking. This is coupled with the fact that many of these blocks are located in the most hilly areas of the community.

Canyon Blocks

Canyon Blocks are irregular blocks that have developed along canyons and respond to the variation in topography created by the canyons. They are located mostly in the eastern neighborhoods of the community and they are characterized by dead-end streets, irregular lot sizes and lot lines, and cul-de-sacs. An average block width of 300 feet persists, but the depth varies according to the location of the canyons. Lot depths may extend beyond 100-foot in some locations to accommodate the canyon lands. Block access is through winding streets and private driveways. The irregular shape and hidden nature of the lots in this block type make walking and general way-finding a challenge. At the same time, the unique arrangement and shape of lots allows development to be well-suited for canyon interface.

Map Source: Golden Hill Community Plan Draft 2015

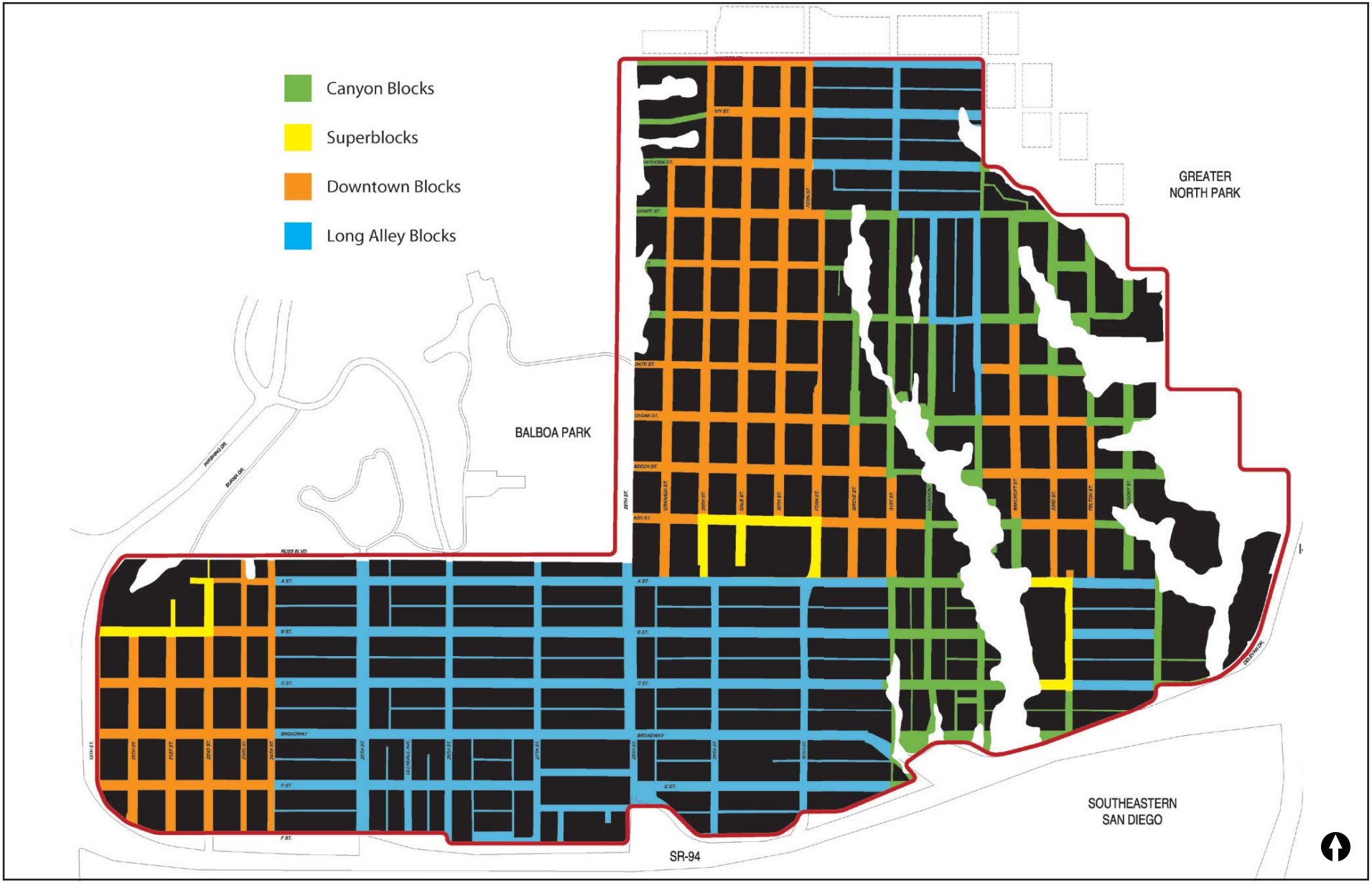


FIGURE 7.2-1
Block Patterns – Golden Hill

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Superblocks

Superblocks are unique blocks in the community where two or three standard blocks are combined to accommodate special uses, such as schools, planned communities, industrial or other non-residential uses. Typically, superblocks are discouraged in existing communities because they disrupt the street network, encourage incompatible and inward-focused development, and they tend to degrade the pedestrian environment. However, exceptions can be made for special community-serving uses, such as schools, where the larger block size allows the flexibility needed to make exceptional types of development feasible.

b. Diversity of Building Types

A defining characteristic of Golden Hill is the rich diversity of building types and architectural styles that exist in the community. Buildings allow for a mix of unit types, sizes, and styles, while their scale, massing and height is consistent across the community. The following are some of the most prevalent building types in the community.

Single-Family or Duplex

Single-family homes are arranged as stand-alone detached dwelling units, or sometimes attached as duplexes. Some lots accommodate accessory dwelling units or "granny flats". Densities for single-family and duplex development typically range from five to 14 units per acre. Parking is integrated into the ground floor of the dwellings or separated in individually-secured garages, with stand-alone garages located toward the rear of the lot.

Bungalow Court

Bungalow courts are dwelling units organized around a central courtyard. The courtyard may contain individual or collective garden plots or patios for building residents to use, or communal open space. Bungalow courts typically range in density from 29 to 44 units per acre. Traditionally, bungalow courts provided smaller unit sizes with little off-street parking. Parking arrangements include a mixture of garages and surface spaces, as well as tandem spaces and tandem lift parking, accessed from an alley.

Rowhome and Townhome

Rowhomes and townhomes are dwelling units attached in a series by use of shared side walls. Although the two terms are sometimes used interchangeably, rowhomes are typically single-ownership attached dwellings arranged in a single row facing a block face, often on separate lots, and townhomes are attached units that are arranged in various denser configurations within a common lot. Rowhomes are not a traditional building form in the community, while townhomes are more common in newer developments. Building heights typically range from two to three levels and densities from 15 to 29 units per acre. Parking for rowhomes and townhomes is typically integrated into the ground floor of the units in individually-secured garages and accessed from the rear of the lot.

Apartment

Apartments are attached dwelling units, most often with common central access. Apartment densities range between 15 and 44 units per acre and accommodate a variety of unit sizes and configurations. Parking is typically located in a below-grade structure that is integrated within the building and privately secured for access by residents only. When parking is partially below-grade or at-grade, the ground floor of apartment buildings typically include active uses to screen the parking behind. Active uses include residences, building amenities, or storefronts with retail or other neighborhood-serving uses where allowed.

Canyons and Views

Due to the community's location adjacent to downtown and Balboa Park and sloping topography, public and private views (both near and far) are common. Views have a strong association with the character of the community. Views are particularly associated with the community's natural scenic amenities of San Diego Bay, Balboa Park, Switzer Canyon, and the 32nd Street and 34th Street canyons. View opportunities where streets terminate at canyons and Balboa Park are also important.

7.2.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to visual effects and neighborhood character are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed Golden Hill CPU. A significant visual effect and neighborhood character impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary actions would:

1) A substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan;
2) Result in a substantial adverse alteration (e.g. bulk, scale, materials or style) to the existing or planned (adopted) character of the area;
3) The loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan
4) Result in a substantial change in the existing landform; or
5) Create substantial light or glare which would adversely affect daytime and nighttime views in the area.

7.2.3 Impact Analysis

Potential impacts resulting from implementation of the proposed Golden Hill CPU and associated discretionary actions were evaluated based on information from existing conditions assessments of urban design, recreation, and conservation in the Golden Hill CPU area. The assessment was made using data from observation, spatial analysis, and a photographic inventory.

Issue 1 Scenic Vistas or Views

Would the project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?

Golden Hill's sloping topography repetitive, linear pattern of streets and blocks and proximity to open spaces within canyons and close proximity to Balboa Park provides a number of view opportunities. While implementation of the Golden Hill CPU and the associated discretionary actions would result in intensification of land uses, the community is largely built out and development integrate into the existing urban framework, keeping within existing developed areas and not resulting in new obstructions to view corridors.

The proposed Golden Hill CPU includes a number of policies that would protect public views. The CPU identifies prominent views to be protected including the natural scenic amenities of San Diego Bay, Balboa Park, Switzer Canyon, the 32nd Street and 34th Street canyons, and locations where streets terminate at canyons and Balboa Park. The proposed Golden Hill CPU Urban Design Concept Map (Figure 7.2-2) identifies gateways and focal elements within the CPU area including the intersections of Grape Street and Fern Street, Beech Street and 30th Street, at the north and south ends of 25th Street, and at the southern end of the CPU area near 28th Street, 30th Street and Broadway. Additionally, the canyons and interface areas between residential areas and Balboa Park are important visual resources.

Policies within the proposed Golden Hill CPU Urban Design Element section on Public Views are intended to preserve public views and view corridors. Proposed policies address setbacks, corner lots, and development scale in relation to protection of public views. The Canyons, Hillsides and Open Space section of the proposed Golden Hill CPU Urban Design Element addresses maintenance and enhancement of, and access to public vistas into canyons. Streetscape policies address the siting of trees to avoid impacts to public views. Thus, with the adherence to existing General Plan and proposed Golden Hill CPU policies, impacts to vistas and scenic views would be less than significant.

Map Source: Golden Hill Community Plan Draft 2015

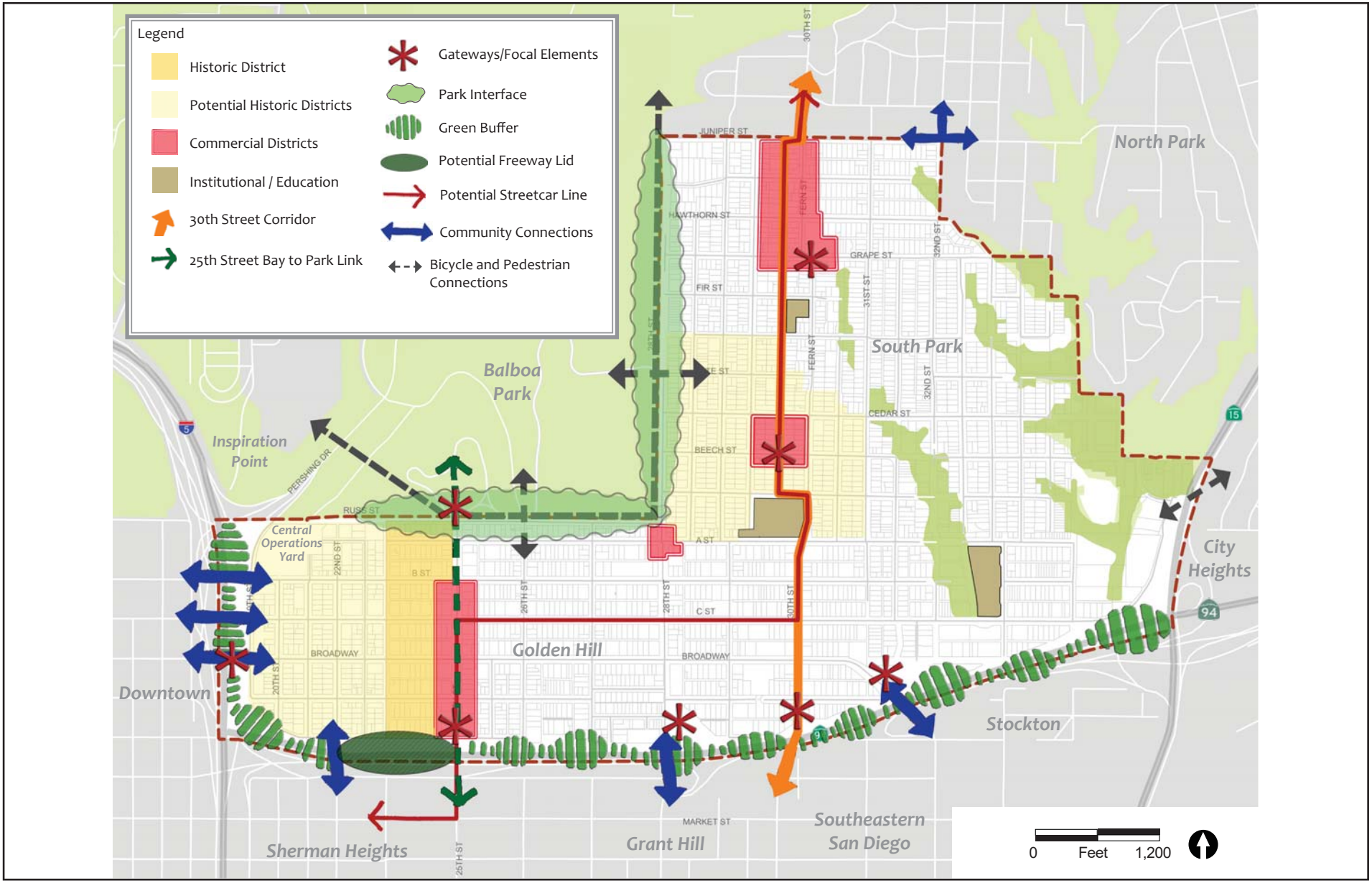


FIGURE 7.2-2
Urban Design Concept – Golden Hill

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Issue 2 Neighborhood Character

Would the project result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area?

Golden Hill is a developed, urbanized community although not all lot or building sites are built to their allowable capacity under the adopted community plan and zone. Thus, build-out of the proposed Golden Hill CPU would result in intensification of existing land uses. The Golden Hill community contains a variety of topographical forms, lot, and building patterns. Common characteristics include a traditional grid pattern of streets, a 50-foot wide lot pattern and generally lower-scale buildings often exhibiting traditional and historic architecture. Building heights allowed under the current Citywide single-family and Golden Hill Planned District zones range between 30, 40 and 50 feet.

The project would repeal the Golden Hill Planned District Ordinance and rezone parcels using existing Citywide zoning. Implementation of proposed Citywide zones would apply similar development controls to those currently in place under the Golden Hill Planned District Ordinance. These include land use typologies (e.g. neighborhood commercial, multi-family residential etc.), residential density and major components of the building envelope such as floor area ratios, heights, and setbacks. Additionally, the proposed Golden Hill CPU provides design guidelines in the Urban Design Element that would guide development during discretionary review to ensure neighborhood character is maintained and enhanced.

The project would also reduce multi-family residential land use densities within portions of the community generally east of 26th Street and south of B Street and would apply zones commensurate with density decreases that also slightly reduce allowable floor area ratios and other zone metrics. These zone reductions would apply to blocks and neighborhoods that have a mixed-character and would likely result in lower scale components of building form within these blocks or neighborhoods.

Proposed Golden Hill CPU urban design policies provide guidance on how new development in Golden Hill should be designed to be compatible with the older established scale and architectural styles of the community. The proposed Golden Hill CPU includes a series of Urban Design Element policies that would be applied during discretionary review of development projects. These policies are intended to direct future development in a manner that ensures that the physical attributes that make the Golden Hill community unique would be retained and enhanced by design that responds to the community's particular context—its physical setting, market strengths, cultural and social amenities, and historical assets—while acknowledging the potential for growth and change. The Community and Neighborhood Design section of the proposed Golden Hill CPU Urban Design Element contains policies relative to community and neighborhood design, streetscape and the public realm, and urban forests and street trees.

The Community and Neighborhood Design section of the proposed Golden Hill CPU Urban Design Element addresses community character and contains a number of policies that would enhance community character. Policies are included to maintain the traditional lot and block patterns of the community, guide the preservation and reuse of traditional and historic buildings, create gateways

to highlight community identity and enhance wayfinding, and address the incorporation of plazas and pockets parks. Other proposed policies address enhanced community access to Balboa Park, an improved interface with SR-94, the creation of 25th Street as the community's bay-to-park link, and the redevelopment of the City's Central Operations Yard site. Implementation of these policies would strengthen and develop the character of the Golden Hill CPU area and result in an overall enhancement of visual character.

Other policies of the proposed Golden Hill CPU Urban Design Element address the network, pattern, and design details for streets, sidewalks, and abutting public spaces including guidance for street trees. Specific development design policies would require context-sensitive design and provides specific policies applicable to renovation of apartment buildings; building frontage detail such as materials and signage; parking; residential design; commercial and mixed use building design; commercial-residential use compatibility; mechanical equipment and utilities; and on-site open space and landscaping. Proposed Urban Design Element policies addressing incorporation of green building practices and sustainability into new buildings and retrofitting of existing buildings would support development of distinctive, context-sensitive architecture that would further enhance the character of the community.

With implementation of the proposed Golden Hill CPU policies, the proposed Golden Hill CPU and associated discretionary actions would not result in a substantial alteration to the existing or planned visual character of the Golden Hill CPU area. Further, proposed policies would serve to enhance the character of the community as future development and redevelopment occurs. Additionally, as much of the Golden Hill CPU area is already developed, build-out of the CPU area would not result in a significant change in the existing urban character of the area since new development or redevelopment would be expected to take place on infill sites. Thus, impacts to community character would be less than significant, and no mitigation would be required.

Issue 3 Distinctive or Landmark Trees

Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant.)

There are no distinctive or landmark tree(s) or stand of mature trees identified in the adopted Community Plan or the proposed Golden Hill CPU. However, there are street trees present within the CPU area that would be subject to City Council Policy 900-19 which provides protection of street trees. The Urban Design Element, Section 4.2 includes Urban Forestry polices which augment the Council Policy and includes polices that protect existing trees, promote the planting of new trees, and provide guidance as to the types of trees that should be planted. While there are no distinctive or landmark trees, the implementation of the proposed Golden Hill CPU and associated discretionary actions would prevent the loss of existing mature trees, except as required because of tree health or public safety. The implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in the loss of any distinctive or landmark trees or any stand of mature trees; therefore no impacts would result.

Issue 4 Landform Alteration

Would the project result in a substantial change in the existing landform?

While implementation of the proposed Golden Hill CPU and associated discretionary actions would intensify land uses as the plan is built out, the proposed Golden Hill CPU contains policies to ensure development takes into account the existing landform. Proposed Golden Hill CPU policies address grading and site design to ensure future development conforms to natural topography, disturbance of steep landforms and vegetation are minimized, and provides guidelines to ensure building form responds to the community's unique canyon environment. Policies within the Land Use, Conservation and Urban Design Elements are intended to preserve existing landforms by limiting the location, size and scope of development. The Land Use Map designates steep slope and canyon landforms as Open Space which would prevent landform alteration in these areas by restricting development within environmentally sensitive areas. Policies within the Canyons, Hillsides and Open Space section of the proposed Golden Hill CPU Urban Design Element would apply in areas with a slope greater than 25 percent that are associated with canyon landforms. Policies in this section are intended to ensure grading and building form is sensitive to topography and natural resources within these areas. Additionally, the Environmentally Sensitive Lands Regulations of the LDC would apply within areas of steep natural landforms. These regulations restrict development in order to preserve steep slope landforms.

Because the proposed Golden Hill CPU is an adoption of a plan, development would occur in the future over an extended time period and specific grading quantities associated with future development are presently unknown. However, implementation of the proposed Golden Hill CPU and associated discretionary actions would not involve mass grading since the Golden Hill CPU area is already nearly fully developed with urban uses. Future development within the Plan area would occur as infill or redevelopment of existing developed areas due to the built out nature of the existing setting. As the proposed Golden Hill CPU is implemented, future projects would be required to demonstrate compliance with the City's grading requirements outlined in the LDC. Therefore, with implementation of existing regulations and policies of the proposed Golden Hill CPU, impacts related to landform alteration would be less than significant.

Issue 5 Light and Glare

Would the project create substantial light or glare which would adversely affect daytime or nighttime views in the area?

The Golden Hill community is a built-out urban community. Sources of light currently include those typical of an urban community, such as building lighting for residential and commercial and intuitional land uses, roadway infrastructure lighting, and signage. Future development implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions would necessitate the use of additional light fixtures and may contribute to existing conditions of light and glare. New light sources may include residential and non-residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas.

The proposed Golden Hill CPU includes policies that support providing lighting to enhance community gateways, to illuminate buildings, and to provide visibility, security and pedestrian safety. Within MHPA areas, primarily located within canyon areas of the Golden Hill CPU area, MSCP Adjacency Guidelines would require lighting adjacent to the MHPA to be directed away from the MHPA.

Outdoor lighting is regulated by Section 142.0740 of the LDC. The purpose of the City's outdoor lighting regulations is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building Regulations where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. No direct-beam illumination is permitted to leave the premises. The City's lighting regulations require that most outdoor lighting be turned off between 11:00 P.M. and 6:00 A.M. with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 P.M., adequate lighting for public safety). Any future development would be required to comply with the applicable outdoor lighting regulations of the City of San Diego Municipal Code.

With respect to glare, Section 142.0730 of the City's LDC limits a maximum of 50 percent of the exterior of a building to be comprised of reflective material that has a light reflectivity factor greater than 30 percent. Additionally, per Section 142.0730(b), reflective building materials are not permitted where the it is determined that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space.

With requisite implementation of the proposed Golden Hill CPU, the General Plan, and LDC regulations, as well as requirements of the MHPA Adjacency Guidelines, lighting and glare impacts would be less than significant.

Cumulative Impact Analysis

Future growth within the Golden Hill CPU area in combination with development within surrounding areas including the proposed North Park and Uptown CPU areas has the potential to cumulatively impact the visual environment through the design and location of future buildings. However, the cumulative visual impact of build-out of the three communities would not result in a cumulatively significant impact since the CPU areas are already urbanized and include existing development of the type that would be further developed under the CPUs.

Future development in accordance with the CPUs is likely to take place on infill sites in previously developed locations. Each proposed CPU (Golden Hill, North Park, Uptown) contains policies to ensure that future development is consistent with the neighborhood character and protects public views. Proposed policies address consistency in setbacks, height and bulk, landscaping, design, historic character, and natural features such as canyons and hillsides. The CPUs also contain policies to preserve, protect, and restore existing landforms. Compliance with the Municipal Code would ensure cumulative light and glare impacts are avoided. Based on the existing urbanized character of

the CPU areas and implementation of existing regulations and proposed CPU policies, cumulative impacts would be less than significant.

7.2.4 Significance of Impacts

Issue 1 Scenic Vistas or Views

The implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in substantial obstruction of public views from view corridors, designated open space areas, public roads, or public parks. New development within the community would take place within the constraints of the existing urban framework and development pattern, thereby not impacting view corridors along transportation corridors. The policies of the proposed Golden Hill CPU and associated discretionary actions would enhance public view corridors through use of setbacks and design improvements along major roadways within the plan area. Therefore, public view impacts would be less than significant, and no mitigation would be required.

Issue 2 Neighborhood Character

The proposed Golden Hill CPU Urban Design Element policies would encourage residential and mixed-use development and would be consistent with existing neighborhood character. Impacts would be less than significant and no mitigation would be required.

Issue 3 Distinctive or Landmark Trees

The implementation of the proposed Golden Hill CPU would not result in the loss of any distinctive or landmark trees or any stand of mature trees; therefore no impacts would result. No mitigation measures would be required.

Issue 4 Landform Alteration

Implementation of the proposed Golden Hill CPU and associated discretionary actions would result in less than significant impacts related to landform alteration based on implementation of proposed Golden Hill CPU polices that require building form to be sensitive to topography and slopes and existing protections for steep slopes (environmentally sensitive lands) and grading regulations within the LDC. Thus, impacts related to landform alteration would be less than significant and no mitigation would be required.

Issue 5 Light and Glare

Impacts relative to lighting and glare would be less than significant. No mitigation would be required.

7.2.5 Mitigation Measures

Impacts of build out of the Golden Hill CPU and associated discretionary actions would be less than significant with the application of applicable City General Plan, proposed Golden Hill CPU policies, and LDC requirements. Thus, no mitigation is required.

7.3 Transportation and Circulation

Kimley-Horn and Associates. Inc. conducted the *Uptown, North Park, and Golden Hill CPU Traffic Impact Study* (June 2015). The report is included in Appendix B to this draft Program Environmental Impact Report (EIR). The results of the report pertinent to the Golden Hill community are presented in this section. Additionally, Kimley-Horn and Associates, Inc. prepared the *Uptown, North Park, and Golden Hill Community Plan Update Mobility Study for Future Year Conditions*. That report is included in Appendix C to this EIR and discussed in this section, as applicable.

7.3.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2 and 5, respectively. This section summarizes the existing roadway circulation network, daily and peak-hour traffic volumes, and operations at the study intersections and roadway and freeway segments pertinent to the Golden Hill CPU area.

7.3.1.1 Roadway Network

The following section provides a description of the existing study area streets within the Golden Hill community. Ultimate roadway classifications are taken from the currently adopted Golden Hill Community Plan, last updated June 1990. The portions of the roadways described are intended to reflect the areas within the community and may not reflect the entirety of the roadway. Functional classifications are based on field observations performed during preparation of the *Traffic Impact Study*. Figure 7.3-1 illustrates the existing roadway classifications for Golden Hill. The City of San Diego Bicycle Master Plan (City BMP) identifies several bicycle facilities in the community, as noted in the roadway descriptions below.

25th Street functions as a north-south 4-lane collector with a curb to curb width of 60 feet between State Route 94 (SR-94) and B Street, and a 2-lane collector with a center turn lane and a curb to curb width of 60 feet between B Street and Russ Boulevard. It is currently functioning at its adopted plan ultimate classification. 25th Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. 25th Street provides access to SR-94 eastbound and also connects with Balboa Park to the north. The City BMP proposes 25th Street as a Class III (Bike Route) facility between Balboa Park and downtown with the option of a Class II (Bike Lanes) facility between Broadway and Market Street.

26th Street functions as a north-south 2-lane collector with a curb to curb width of 40 feet between F Street and Russ Boulevard. It is currently functioning at its adopted plan ultimate classification. 26th Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

Map Source: SanGIS

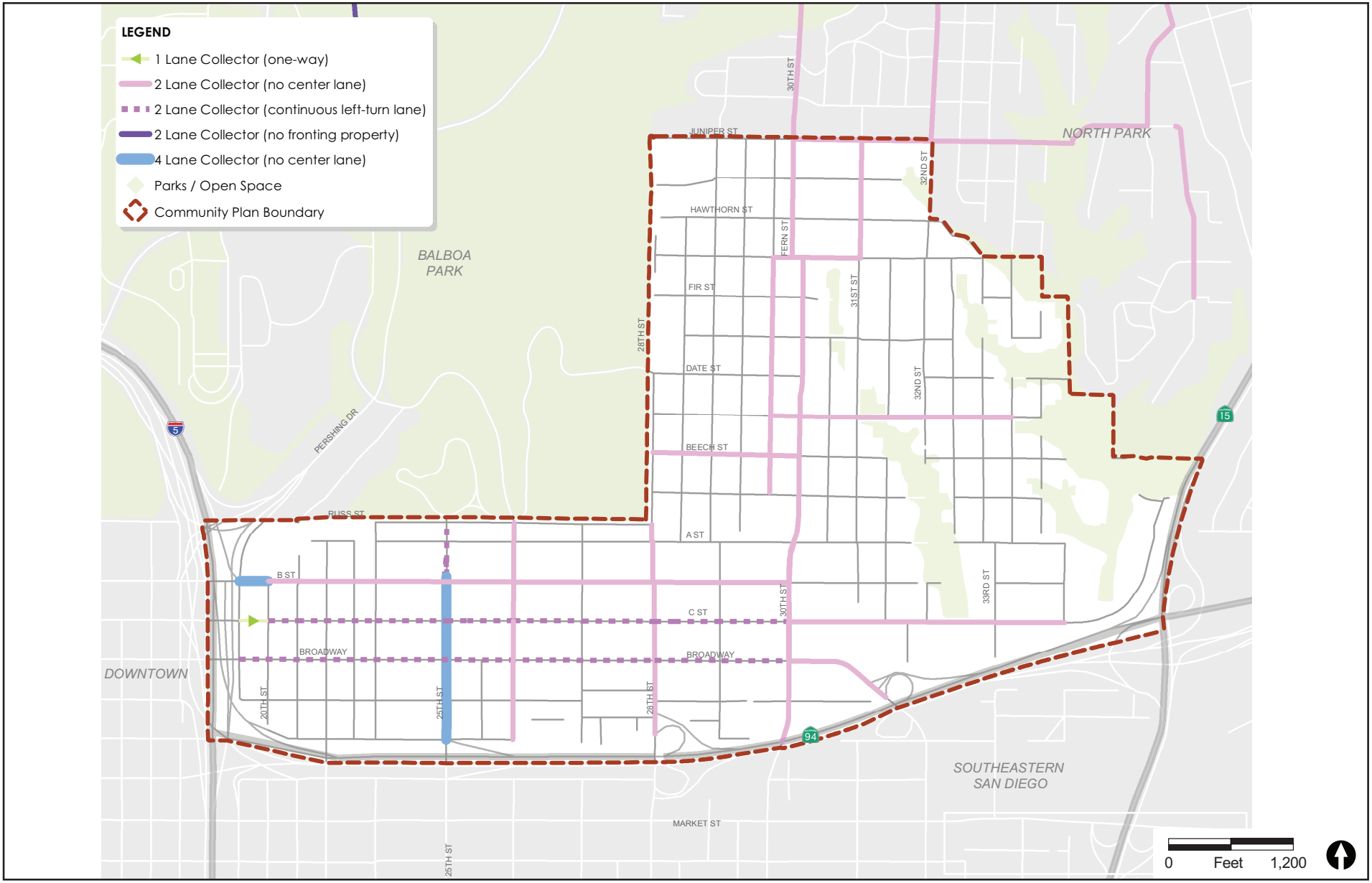


FIGURE 7.3-1

Existing Functional Street Classifications – Golden Hill

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28th Street functions as a north-south 2-lane collector with a curb to curb width of 50 feet between SR-94 and Russ Boulevard. Its adopted plan ultimate classification is a 3-lane collector between SR-94 and B Street. 28th Street is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the east side of the street between A Street and B Street and on the west side of the street between C Street and Broadway. Parallel parking is available along other sections. The posted speed limit is 30 mph. 28th Street provides access to SR-94 eastbound and westbound. North of A Street, 28th Street serves as the eastern boundary of Balboa Park. 28th Street is classified as a Class III (Bike Route) facility south of Broadway. The City BMP proposes Class II (Bike Lane) between Broadway and SR-94, extending the 28th Street Class III (Bike Route) facility from Broadway north to Beech Street, and Class I (Bike Path) north of Beech Street.

30th Street functions as a north-south 2-lane collector with a curb to curb width of 40 feet between SR-94 and A Street where it changes name to Fern Street. 30th street picks up again offset one block to the west as a 2-lane collector with a curb to curb width of 50 feet. Its adopted plan ultimate classification has 30th Street as a 3-lane collector between SR-94 and C Street. It is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the west side of the street between Newton Avenue and National Avenue, between Greely Avenue and Ocean View Boulevard, between Juniper Street and Ivy Street, and between ~~Grape Street and~~ Hawthorn Street and Grape Street. Parallel parking is available along other sections. The posted speed limit is 30 mph. 30th Street is classified as a Class III bicycle facility. The City BMP proposes 30th Street as either a Class II (Bike Lanes) or Class III (Bike Route) facility north of Upas Street and a Class III (Bike Route) south of Upas Street. 30th Street and Fern Street is the main roadway connecting the Golden Hill community with the North Park community.

31st Street functions as a north-south 2-lane collector with a curb to curb width of 40 feet between B Street and Cedar Street and between Grape Street and Juniper Street, and as a one-way southbound 1-lane collector with a curb to curb width of 25 feet between Grape Street and Cedar Street. It is currently functioning at its adopted plan ultimate classification. 31st Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph.

B Street functions as an east-west 4-lane collector with no center lane and a curb to curb width of 50 feet between Interstate 5 (I-5) and 20th Street, and as a 2-lane collector with a curb to curb width of 50 feet between 20th Street and 32nd Street. It is currently functioning at its adopted plan ultimate classification. B Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 30 mph. The City BMP proposes B Street as a Class III (Bike Route) facility between 19th Street and Fern Street and as a Class II (Bike Lanes) facility west of 19th Street. B Street provides access to I-5 and downtown San Diego.

Beech Street functions as an east-west 2-lane collector with a curb to curb width of 50 feet between 28th Street and Fern Street. It is currently functioning at its adopted plan ultimate classification. Beech Street is lined with sidewalks and curbs with parking available on both sides of the street. Angle parking is available on the south side of the street between Dale Street and 30th Street. Parallel parking is available along other sections. The posted speed limit is 30 mph. The City BMP proposes Beech Street as a Class III (Bike Route) facility between 28th Street and Edgemont Street.

Broadway functions as an east-west 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between 19th Street and 29th Street, and as a 2-lane collector with a curb to curb width of 50 feet east of 29th Street with widening by the SR-94 ramps. Its adopted plan ultimate classification would be a 4-lane major for the portion east of 30th Street. Broadway is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. Broadway provides access to SR-94 and downtown San Diego. Broadway is classified as a Class III bicycle facility. The City BMP proposes Broadway Street as potentially being a Class II (Bike Lanes) facility between 19th Street and 22nd Street and between 28th Street and SR-94.

C Street functions as an east-west 2-lane collector with a two-way left-turn lane and a curb to curb width of 50 feet between I-5 and 29th Street, and as a 2-lane collector with a curb to curb width of 50 feet between 29th Street and Delevan Drive. Its adopted plan ultimate classification is a 2-lane collector. C Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 30 mph. The City BMP proposes C Street as a Class III (Bike Route) facility between 19th Street and Delevan Drive.

Cedar Street functions as an east-west 2-lane collector between Fern Street and Gregory Street. Cedar Street has a curb to curb width of 40 feet between Fern Street and Edgemont Street and 40 feet between Edgemont Street and Gregory Street. It is currently functioning at its adopted plan ultimate classification. The segment between 32nd Street and Gregory Street is not identified in the future classifications. Cedar Street is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 30 mph.

Fern Street functions as a north-south 2-lane collector with a curb to curb width of 40 feet between C Street and Juniper Street. Its adopted plan ultimate classification has Fern Street as a 3-lane collector between C Street and A Street. It is lined with sidewalks and curbs with parallel parking available on both sides of the street. The posted speed limit is 25 mph. The City BMP proposes Fern Street as a Class III (Bike Route) north of B Street, a Class II (Bike Lanes) between B Street and SR-94 with the option of a Class III (Bike Route) facility between Broadway and SR-94.

Grape Street functions as an east-west 2-lane collector between 28th Street and Marlton Drive. Grape Street has a curb to curb width of 50 feet between 28th Street and 31st Street and 40 feet between 31st Street and Marlton Drive. It is currently functioning at its adopted plan ultimate classification. Grape Street is lined with sidewalks and curbs with parking available on both sides of the street. The posted speed limit is 25 mph.

7.3.1.2 Roadway Segment Conditions

In order to determine the impacts on the study area roadway segments, Table 7.3-1 has been developed by the City of San Diego and is used as a reference. The segment traffic volumes under LOS E as shown in this table are considered at capacity because at LOS E the v/c ratio is equal to 1.0.

Table 7.3-1
City of San Diego Roadway Segment Capacity and Level of Service

Road Class	Lanes	A	B	C	D	E
Freeway	8	60,000	84,000	120,000	140,000	150,000
Freeway	6	45,000	63,000	90,000	110,000	120,000
Freeway	4	30,000	42,000	60,000	70,000	80,000
Expressway	6	30,000	42,000	60,000	70,000	80,000
Prime Arterial (two-way)	6	25,000	35,000	50,000	55,000	60,000
Major Arterial (two-way)	6	20,000	28,000	40,000	45,000	50,000
Major Arterial (two-way)	4	15,000	21,000	30,000	35,000	40,000
Major Arterial (two-way)	3	11,250	15,750	22,500	26,250	30,000
Major Arterial (one-way)	3	12,500	16,500	22,500	25,000	27,500
Major Arterial (one-way)	2	10,000	13,000	17,500	20,000	22,500
Collector (two-way)	4	10,000	14,000	20,000	25,000	30,000
Collector (No center lane) (Continuous left-turn lane)	4 2	5,000	7,000	10,000	13,000	15,000
Collector (No fronting property)	2	4,000	5,500	7,500	9,000	10,000
Collector (two-way)	3	7,500	10,500	15,000	17,500	20,000
Collector (no center turn lane)	3	4,000	5,500	7,500	10,000	11,500
Collector (Commercial/Industrial fronting)	2	2,500	3,500	5,000	6,500	8,000
Collector (Multi-family)	2	2,500	3,500	5,000	6,500	8,000
Collector (one-way)	3	11,000	14,000	19,000	22,500	26,000
Collector (one-way with one lane dedicated for bike facility)	3	7,500	9,500	12,500	15,000	17,500
Collector (one-way)	2	7,500	9,500	12,500	15,000	17,500
Collector (one-way)	1	2,500	3,500	5,000	6,250	7,500
Sub-Collector (Single family)	2	–	–	2,200	–	–

Notes:
The volumes and the average daily level of service listed above are only intended as a general planning guideline.
Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.
Capacities for any classification not identified in the sources noted below were developed based on interpolation from similar classifications.

Sources: City of San Diego Traffic Impact Study Manual, Table 2, Page 8, July 1998.
City of San Diego Planning Department Mobility Section

Based on planning-level analysis using ADT volumes, it is estimated that all roadway segments within the Golden Hill community function at an acceptable LOS D or better, except for the following segments. The segments listed below have volumes near or above their existing capacity, resulting in periods of congestion.

- 26th Street between Russ Boulevard and B Street (LOS F)
- 28th Street between C Street and Broadway (LOS F)
- 28th Street between Broadway and SR-94 (LOS F)
- 30th Street between A Street and Broadway (LOS F)
- Broadway between 30th Street and SR-94 (LOS F)
- Fern Street between Juniper Street and Grape Street (LOS F)
- Fern Street between Grape Street and A Street (LOS F)

Figure 7.3-2 displays the existing roadway segment ADT volumes for the Golden Hill CPU area.

Map Source: SanGIS

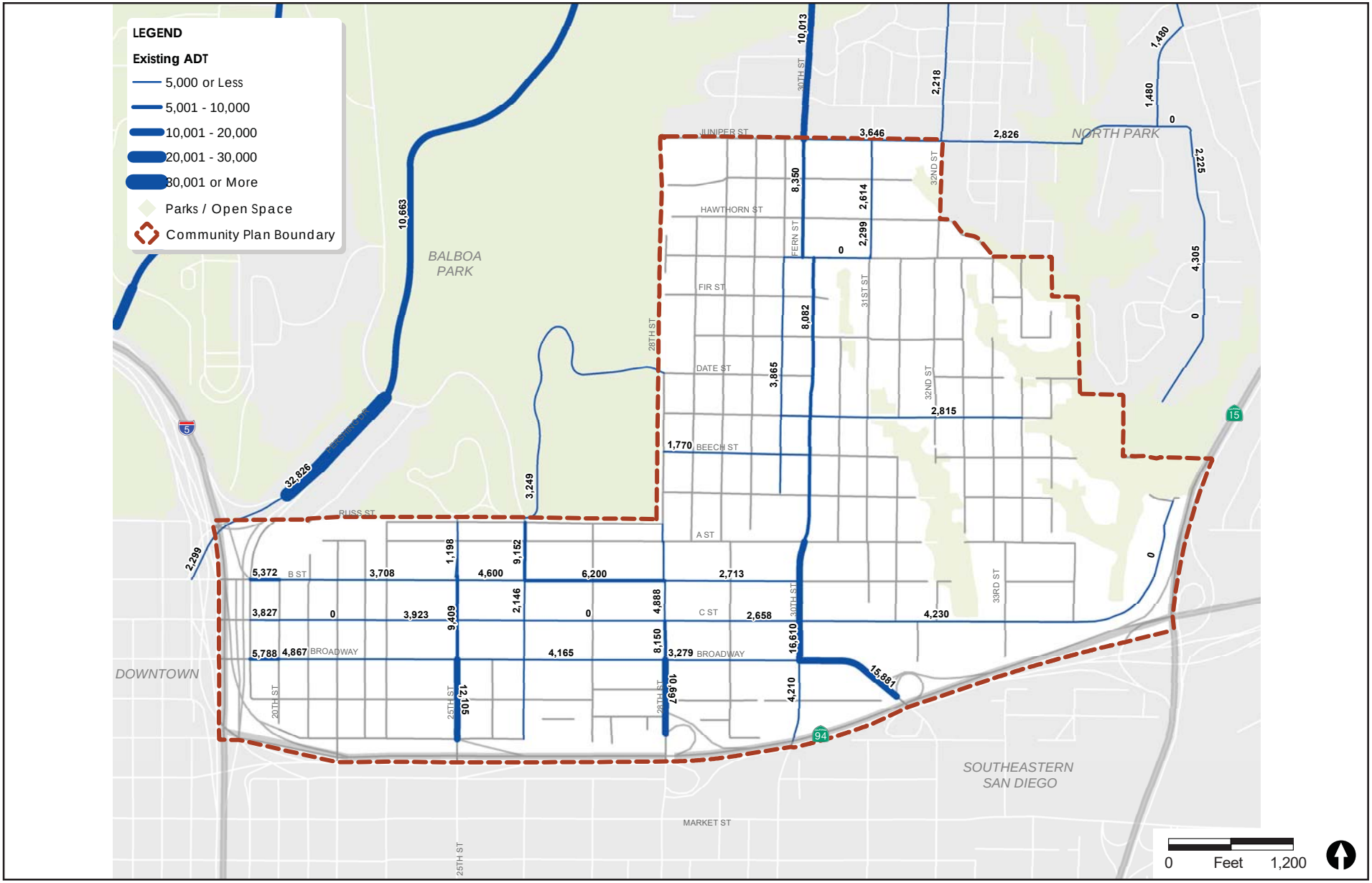


FIGURE 7.3-2

Existing Roadway Segment ADT Volumes – Golden Hill

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7.3.1.3 Intersection Conditions

The TIS (Appendix B-1) includes a LOS analysis for the study intersections within the Golden Hill community under Existing Conditions. Level of service (LOS) for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in additional to the stop delay. The level of service for unsignalized intersections is determined by the computed or measured control delay and is defined for each minor movement. The criteria for the various levels of service designations for signalized and unsignalized intersections are given in Table 7.3-2.

Table 7.3-2
Level of Service Criteria for Intersections

LOS	Signalized (Control Delay) (sec/veh)[a]	Unsignalized (Control Delay) (sec/veh)[b]	Description
A	≤10.0	≤10.0	Operations with very low delay and most vehicles do not stop.
B	>10.0 and ≤20.0	>10.0 and ≤15.0	Operations with good progression but with some restricted movement.
C	>20.0 and ≤35.0	>15.0 and ≤25.0	Operations where a significant number of vehicles are stopping with some backup and light congestion
D	>35.0 and ≤55.0	>25.0 and ≤35.0	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines.
E	>55.0 and ≤80.0	>35.0 and ≤50.0	Operations where these is significant delay, extensive queuing, and poor progression.
F	>80.0	>50.0	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

Source:
[a]2000 Highway Capacity Manual, Chapter 16, Page 2, Exhibit 16-2
[b]2000 Highway Capacity Manual, Chapter 17, Page 2, Exhibit 17-2

Within the City of San Diego, all signalized and unsignalized intersections are considered deficient if they operate at LOS E or F. All intersections currently operate at LOS D or better during both peak periods, except for the following intersections:

- B Street & 17th St/I-5 SB Off-Ramp (LOS F – AM peak)
- SR-94 WB Ramps & Broadway (LOS F – both peaks)
- SR-94 WB Ramps & 28th Street (LOS E – AM peak, LOS F – PM peak)
- SR-94 EB Ramps & 28th Street (LOS F – PM peak)

At the intersection of B Street and I-5 Southbound Off-Ramp, vehicles looking to go through the intersection in the southbound direction have trouble finding gaps in traffic. During the AM peak, there are 1,159 vehicles in the westbound direction that the southbound through movement has to cross. Gaps are created briefly when the upstream traffic signal changes phases, but it does not provide enough gaps for all the vehicles to cross. At the intersection of SR-94 Westbound Ramps and Broadway, the westbound left-turn movement from the off-ramp is stop-controlled while Broadway has free movements. These left turning vehicles have to wait for gaps in traffic along Broadway. Due to the volumes on Broadway, gaps are not provided often enough to operate at an adequate LOS during either peak-hour. At the intersections of SR-94 Westbound Ramps and 28th Street and SR-94 Eastbound Ramps and 28th Street, the westbound left-turn movements from the off-ramps are stop-controlled while 28th Street has free movements. These left turning vehicles have to wait for gaps in traffic along 28th Street. Due to the volume on 28th Street, gaps are not provided often enough to operate at an adequate LOS during either peak-hour.

7.3.1.4 Freeway Segments

Table 7.3-3 identifies Caltrans criteria used to rate freeway segment operations based on a LOS scale from A to F. Freeway volumes were obtained from Caltrans. Table 7.3-4 displays the LOS analysis results for the study freeway segments under existing conditions. As shown in the table, the freeway segments surrounding the Golden Hill CPU area have volumes that exceed the capacity during peak hours. In general, the failing segments are those that move traffic away from the cluster communities in the morning and towards the cluster communities in the afternoon.

Interstate 5 shows LOS E or F in the northbound direction at each of the segments except between Washington Street and Pacific Highway during the AM peak. In the PM peak, LOS E or F occurs from First Avenue to Sixth Avenue and from State Route 163 (SR-163) to SR-94, both in the southbound direction.

Interstate 8 shows LOS E or F at each of the study segments in both peak periods. The failing LOS shows up in the westbound direction during the AM peak and in the eastbound direction during the PM peak.

State Route 15 shows LOS E in the southbound direction during both the AM and PM peaks between Interstate 805 (I-805) and SR-94.

Interstate 805 shows LOS E or F in one direction each of the segments in the AM peak. From Interstate 8 (I-8) to Adams Avenue, the deficient direction is northbound, and for segments from El Cajon Boulevard to State Route 15 (SR-15), the deficient direction is southbound. During the PM peak, the deficient segments are southbound from I-8 to Adams Avenue and northbound from El Cajon Boulevard to University Avenue.

State Route 94 shows LOS E or F in the westbound direction during the AM peak and in the eastbound direction in the PM peak.

State Route 163 shows LOS E or F in the southbound direction from Washington Street to I-5 during the AM peak and in the northbound direction from I-5 to Washington Street during the PM peak. In

addition, the segment of SR-163 from Quince Drive to I-5 in the southbound direction is LOS F in the PM peak.

Table 7.3-3
Level of Service Criteria for Freeway Segment Analysis

LOS	v/c Ratio	Congestion/Delay	Traffic Description
A	<0.41	None	Free Flow
B	0.41 – 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, and very limited freedom to maneuver
E	0.93 – 1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor
F_0	1.01 – 1.25	Considerable 0-1 hour delay	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection
F_1	1.26 – 1.35	Severe 1-2 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go
F_2	1.36 – 1.45	Very severe 2-3 hour delay	Extremely heavy congestion, very long queues
F_3	>1.46	Extremely severe 3+ hour delay	Gridlock

Notes:
Source: Caltrans Guidelines, 1992

Table 7.3-4 Existing Freeway Segment Level of Service									
Freeway Segment	Direction	# of Lanes	Capacity[a]	ADT[b]	2-way Peak Hour Volume[c]	D (Directional Split)	Peak-Hour Volume[c]	V/C Ratio	LOS
AM PEAK									
I-5									
Old Town Ave to Washington St	NB	4 M + 1 A	9,200	196,000	15,600	0.560	8,736	0.95	**E**
	SB	4 M + 1 A	9,200			0.440	6,864	0.75	C
Washington St to Pacific Highway	NB	4 M	8,000	148,000	12,000	0.560	6,720	0.84	D
	SB	4 M	8,000			0.440	5,280	0.66	C
First Ave to Sixth Ave	NB	4 M + 1 A	9,200	201,000	15,500	0.750	11,625	1.26	**F_1**
	SB	5 M + 1 A	11,200			0.250	3,875	0.35	A
SR-163 to SR-94	NB	5 M + 1 A	11,200	210,000	16,200	0.750	12,150	1.08	**F_0**
	SB	5 M + 1 A	11,200			0.250	4,050	0.36	A
SR-94 to Imperial Ave	NB	4 M + 1 A	9,200	164,000	12,700	0.750	9,525	1.04	**F_0**
	SB	4 M + 1 A	9,200			0.250	3,175	0.35	A
I-8									
Hotel Circle (W) to Hotel Circle (E)	WB	4 M + 1 A	9,200	208,000	16,500	0.570	9,405	1.02	**F_0**
	EB	4 M	8,000			0.430	7,095	0.89	D
Mission Center Rd to Qualcomm Wy	WB	4 M + 1 A	9,200	224,000	17,900	0.570	10,203	1.11	**F_0**
	EB	4 M + 1 A	9,200			0.430	7,697	0.84	D
I-805 to SR-15	WB	4 M + 1 A	9,200	242,000	19,100	0.650	12,415	1.35	**F_1**
	EB	4 M + 1 A	9,200			0.350	6,685	0.73	C
SR-15									
I-805 to SR-94	NB	3 M + 1 A	7,200	96,000	8,900	0.430	3,827	0.53	B
	SB	2 M + 1 A	5,200			0.570	5,073	0.98	**E**
I-805									
I-8 to Adams Ave	NB	4 M + 1 A	9,200	192,000	15,900	0.730	11,607	1.26	**F_1**
	SB	5 M + 1 A	11,200			0.270	4,293	0.38	A
El Cajon Blvd to University Ave	NB	4 M	8,000	171,000	14,600	0.330	4,818	0.60	B
	SB	4 M + 1 A	9,200			0.670	9,782	1.06	**F_0**
University Ave to SR-15	NB	4 M + 1 A	9,200	169,000	13,000	0.330	4,290	0.47	B
	SB	4 M + 1 A	9,200			0.670	8,710	0.95	**E**

Table 7.3-4 Existing Freeway Segment Level of Service									
Freeway Segment	Direction	# of Lanes	Capacity[a]	ADT[b]	2-way Peak Hour Volume[c]	D (Directional Split)	Peak-Hour Volume[c]	V/C Ratio	LOS
SR-94									
25th St to 28th St	WB	4 M	8,000	123,000	10,700	0.730	7,811	0.98	**E**
	EB	4 M	8,000			0.270	2,889	0.36	A
28th St to 30th St	WB	4 M	8,000	130,000	12,000	0.730	8,760	1.10	**F_0**
	EB	4 M	8,000			0.270	3,240	0.41	A
Broadway to SR-15	WB	4 M	8,000	144,000	13,300	0.730	9,709	1.21	**F_0**
	EB	4 M + 1 A	9,200			0.270	3,591	0.39	A
SR-163									
I-8 to Washington St	NB	3 M + 1 A	7,200	126,000	10,100	0.410	4,141	0.58	B
	SB	3 M + 1 A	7,200			0.590	5,959	0.83	D
Washington St to Robinson Ave	NB	2 M	4,000	96,000	7,800	0.410	3,198	0.80	C
	SB	2 M	4,000			0.590	4,602	1.15	**F_0**
Quince Dr to I-5	NB	2 M	4,000	108,000	10,100	0.350	3,535	0.88	D
	SB	2 M	4,000			0.650	6,565	1.64	**F_2**
PM PEAK									
I-5									
Old Town Ave to Washington St	NB	4 M + 1 A	9200	196,000	15,600	0.460	7,176	0.78	C
	SB	4 M + 1 A	9200			0.540	8,424	0.92	D
Washington St to Pacific Highway	NB	4 M	8000	148,000	12,000	0.460	5,520	0.69	C
	SB	4 M	8000			0.540	6,480	0.81	D
First Ave to Sixth Ave	NB	4 M + 1 A	9200	201,000	15,500	0.640	9,920	1.08	**F_0**
	SB	5 M + 1 A	11200			0.360	5,580	0.50	B
SR-163 to SR-94	NB	5 M + 1 A	11200	210,000	16,200	0.640	10,368	0.93	**E**
	SB	5 M + 1 A	11200			0.360	5,832	0.52	B
SR-94 to Imperial Ave	NB	4 M + 1 A	9200	164,000	12,700	0.640	8,128	0.88	D
	SB	4 M + 1 A	9200			0.360	4,572	0.50	B
I-8									
Hotel Circle (W) to Hotel Circle (E)	WB	4 M + 1 A	9200	208,000	16,500	0.450	7,425	0.81	D
	EB	4 M	8000			0.550	9,075	1.13	**F_0**
Mission Center Rd to Qualcomm Wy	WB	4 M + 1 A	9200	224,000	17,900	0.450	8,055	0.88	D
	EB	4 M + 1 A	9200			0.550	9,845	1.07	**F_0**
I-805 to SR-15	WB	4 M + 1 A	9200	242,000	19,100	0.430	8,213	0.89	D
	EB	4 M + 1 A	9200			0.570	10,887	1.18	**F_0**

Table 7.3-4 Existing Freeway Segment Level of Service									
Freeway Segment	Direction	# of Lanes	Capacity[a]	ADT[b]	2-way Peak Hour Volume[c]	D (Directional Split)	Peak-Hour Volume[c]	V/C Ratio	LOS
SR-15									
I-805 to SR-94	NB	3 M + 1 A	7200	96,000	8,900	0.430	3,827	0.53	B
	SB	2 M + 1 A	5200			0.570	5,073	0.98	**E**
I-805									
I-8 to Adams Ave	NB	4 M + 1 A	9200	192,000	15,900	0.340	5,406	0.59	B
	SB	5 M + 1 A	11200			0.660	10,494	0.94	**E**
El Cajon Blvd to University Ave	NB	4 M	8000	171,000	14,600	0.600	8,760	1.10	**F_0**
	SB	4 M + 1 A	9200			0.400	5,840	0.63	C
University Ave to SR-15	NB	4 M + 1 A	9200	169,000	13,000	0.600	7,800	0.85	D
	SB	4 M + 1 A	9200			0.400	5,200	0.57	B
SR-94									
25th St to 28th St	WB	4 M	8000	123,000	10,700	0.300	3,210	0.40	A
	EB	4 M	8000			0.700	7,490	0.94	**E**
28th St to 30th St	WB	4 M	8000	130,000	12,000	0.300	3,600	0.45	B
	EB	4 M	8000			0.700	8,400	1.05	**F_0**
Broadway to SR-15	WB	4 M	8000	144,000	13,300	0.300	3,990	0.50	B
	EB	4 M + 1 A	9200			0.700	9,310	1.01	**F_0**
SR-163									
I-8 to Washington St	NB	3 M + 1 A	7200	126,000	10,100	0.620	6,262	0.87	D
	SB	3 M + 1 A	7200			0.380	3,838	0.53	B
Washington St to Robinson Ave	NB	2 M	4000	96,000	7,800	0.620	4,836	1.21	**F_0**
	SB	2 M	4000			0.380	2,964	0.74	C
Quince Dr to I-5	NB	2 M	4000	108,000	10,100	0.540	5,454	1.36	**F_2**
	SB	2 M	4000			0.460	4,646	1.16	**F_0**

Notes:
Bold values indicate freeway segments operating at LOS E or F.
M=Main Lane; A= Auxiliary Lane.
[a]The capacity is calculated as 2,000 ADT per main lane and 1,200 ADT per auxiliary lane
[b]Traffic volumes provided by Caltrans (2008)
[c]Peak-hour volume calculated by: (2-way Peak-Hour Volume)*(D)

7.3.1.5 Freeway Ramp Metering

Ramp volumes were obtained from intersection turning movement data when applicable, or from Caltrans volumes. Table 7.3-5 displays the queuing analysis results for the ramps in the study area that are currently metered. The table compares the peak hour demand at the on-ramp with the current meter rate. As shown in the table, the meter rate adequately controls the expected demand without excess queuing for all ramp meters in the Golden Hill CPU area.

Table 7.3-5
Existing Freeway Ramp Metering

On-Ramp	Peak Period	Meter Rate[1] (Veh/Hr)	Demand[2] (Veh/Hr)	Excess Demand (Veh/Hr)	Average Delay (Min)
Interstate 5					
Washington St to I-5 NB	AM	996	1020	24	1.4
	PM	996	1034	38	2.3
India St to I-5 NB	AM	996	915	0	0.0
	PM	996	1066	70	4.2
Hawthorn St to I-5 NB	AM	996	454	0	0.0
	PM	996	842	0	0.0
Hancock St to I-5 SB	AM	Ramp not metered in the AM peak			
	PM	1140	1287	147	7.7
Kettner Blvd to I-5 SB	AM	Ramp not metered in the AM peak			
	PM	498	269	0	0.0
Fifth Ave to I-5 SB	AM	Ramp not metered in the AM peak			
	PM	996	1087	91	5.5
Interstate 8					
NB Texas St to I-8 EB	AM	Ramp not metered in the AM peak			
	PM	498	465	0	0.0
SB Texas St to I-8 EB	AM	Ramp not metered in the AM peak			
	PM	1140	866	0	0.0
Interstate 805					
El Cajon Blvd to I-805 NB	AM	1140	860	0	0.0
	PM	Ramp not metered in the PM peak			
University Ave to I-805 NB	AM	1140	998	0	0.0
	PM	Ramp not metered in the PM peak			
State Route 94					
28th St to SR-94 WB	AM	534	100	0	0.0
	PM	Ramp not metered in the PM peak			
32nd St/Broadway to SR-94 WB	AM	570	99	0	0.0
	PM	Ramp not metered in the PM peak			
25th St to SR-94 EB	AM	Ramp not metered in the AM peak			
	PM	960	785	0	0.0
28th St to SR-94 EB	AM	Ramp not metered in the AM peak			
	PM	960	732	0	0.0
32nd St/Broadway to SR-94 EB	AM	Ramp not metered in the AM peak			
	PM	570	464	0	0.0

Table 7.3-5
Existing Freeway Ramp Metering

On-Ramp	Peak Period	Meter Rate[1] (Veh/Hr)	Demand[2] (Veh/Hr)	Excess Demand (Veh/Hr)	Average Delay (Min)
State Route 163					
Washington St to SR-163 SB	AM	498	373	0	0.0
	PM	Ramp not metered in the PM peak			

Notes:
[1] Meter rate is the assumed peak hour capacity expected to be processed through the ramp meter (using Caltrans fast rate)
[2] Demand is the peak hour demand using the on-ramp

7.3.1.6 Alternative Transportation Facilities

a. Transit

Transit routes are minimal in Golden Hill but are adequate to serve the needs of the community. The routes currently travel through the commercial areas of Golden Hill and are able to serve many of the residential areas. Canyons and topography do limit the walking distance from some of the transit stops. The roadways with bus routes are primarily two lane streets. The buses share space with vehicles and bicyclists, but speeds and volumes are fairly low. Figure 7.3-3 identifies planned transit facilities in the Golden Hill CPU area identified in the SANDAG San Diego Forward: The Regional Plan (RP)~~2050 RTP~~.

b. Bicycle Facilities

The City of San Diego BMP established guidance on achieving an ideal bicycle environment throughout the City. Similarly, a key focus of the San Diego Regional Bicycle Plan (RBP) prepared by SANDAG is to develop an interconnected network of bicycle corridors to improve the connectivity and quality of bicycle facilities and their supporting facilities. While these documents look at citywide and regional goals, the same focuses to develop quality facilities are applied to the local street networks in the community of Golden Hill.

Golden Hill has transformed into a community that is very supportive of bicycle travel. The South Park merchants hosted the first Ciclovia event in San Diego in 2013 to promote and celebrate biking. Merchants generously provide bike racks as they see the benefits of attracting customers who travel on bicycle. Golden Hill has already begun improving bicycle facilities within the community with implementation of a road diet on 25th Street planned for completion in 2015. That project will reduce the number of vehicle lanes from two to one in each direction, making room for Class II bicycle lanes and reverse angle parking.

Transportation corridors in Golden Hill are limited due to canyons and topography. As a result, bicyclists and vehicles often share the same space, either with bicycle lanes or shared lanes. This is particularly the case on north-south routes between Golden Hill and North Park. Fortunately, roadways are narrow and bicyclist travel at speeds comparable to vehicles.

Map Source: SanGIS

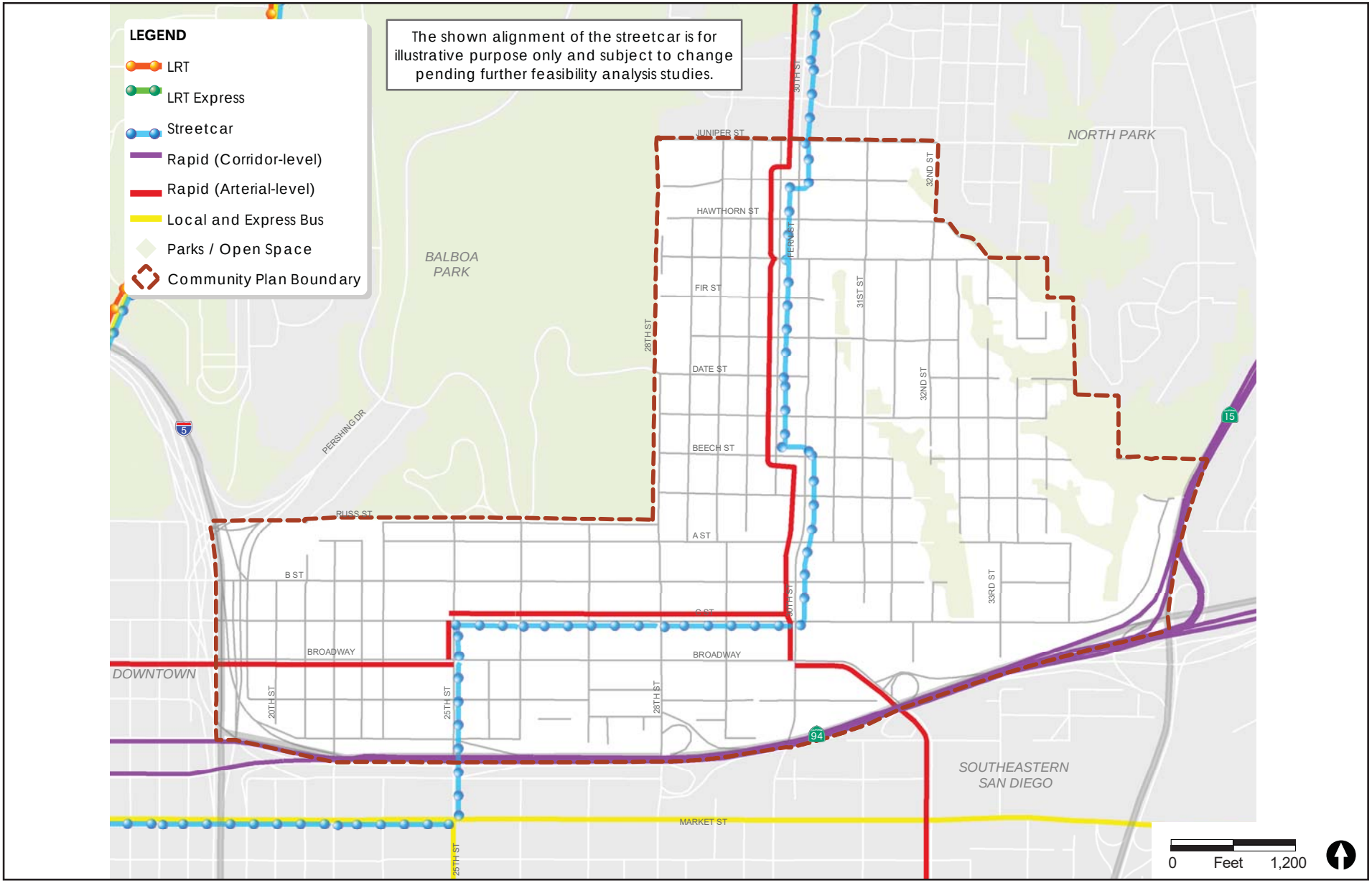


FIGURE 7.3-3

Planned Transit Facilities – Golden Hill

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Golden Hill sits adjacent to and on a hill above downtown San Diego. Broadway is the least steep of the streets that connect to downtown and currently has Class II bicycle lanes. I-15 forms a boundary to the east of the community with no vehicle, bike or pedestrian connections. To the south, SR-94 has several roadways connecting into the Sherman Heights community.

SANDAG's regional bicycle facilities planned for the Golden Hill community are shown on Figure 7.3-4. The recommended bicycle facility network for the Golden Hill community that interfaces with the regional bicycle network is shown on Figure 7.3-5.

c. Pedestrian Facilities

Golden Hill is an active pedestrian community. Despite its challenges with steep grades that can make it difficult for long pedestrian trips, the grid-like street network and variety of land uses makes it attractive for pedestrians.

25th Street is designated as a combination of District and Corridor Sidewalk, while several other roadways in that area were designated as Connector Sidewalks. 28th Street runs adjacent to Balboa Park and connects with trails and provides an excellent pedestrian environment on the west side of the street. It is designated as a combination of Connector and Corridor Sidewalk.

30th Street and Fern Street create a core commercial area in the community that draws a lot of pedestrian activity. They are both designated as Corridor Sidewalk north of Broadway. People like to park and walk around these neighborhoods to shop and dine. There are many events hosted in this area that encourage pedestrian involvement, such as the quarterly South Park Walkabouts. On the east side of the community pedestrian activity is much lower as it is separated by canyons and more removed from retail and recreation attractions.

There are several locations where curb ramps are not provided, which creates accessibility issues. Some of these locations are along steep terrains where accessibility requirements cannot be met due to the grade of the adjacent roadway. A landscape buffer is provided along most of the roadways in the community to separate pedestrians from the travel lanes. This provides an area for pedestrians to access their cars without impeding on the sidewalk, as well as provide opportunities for shade, protection, and aesthetics.

Map Source: KTU+A

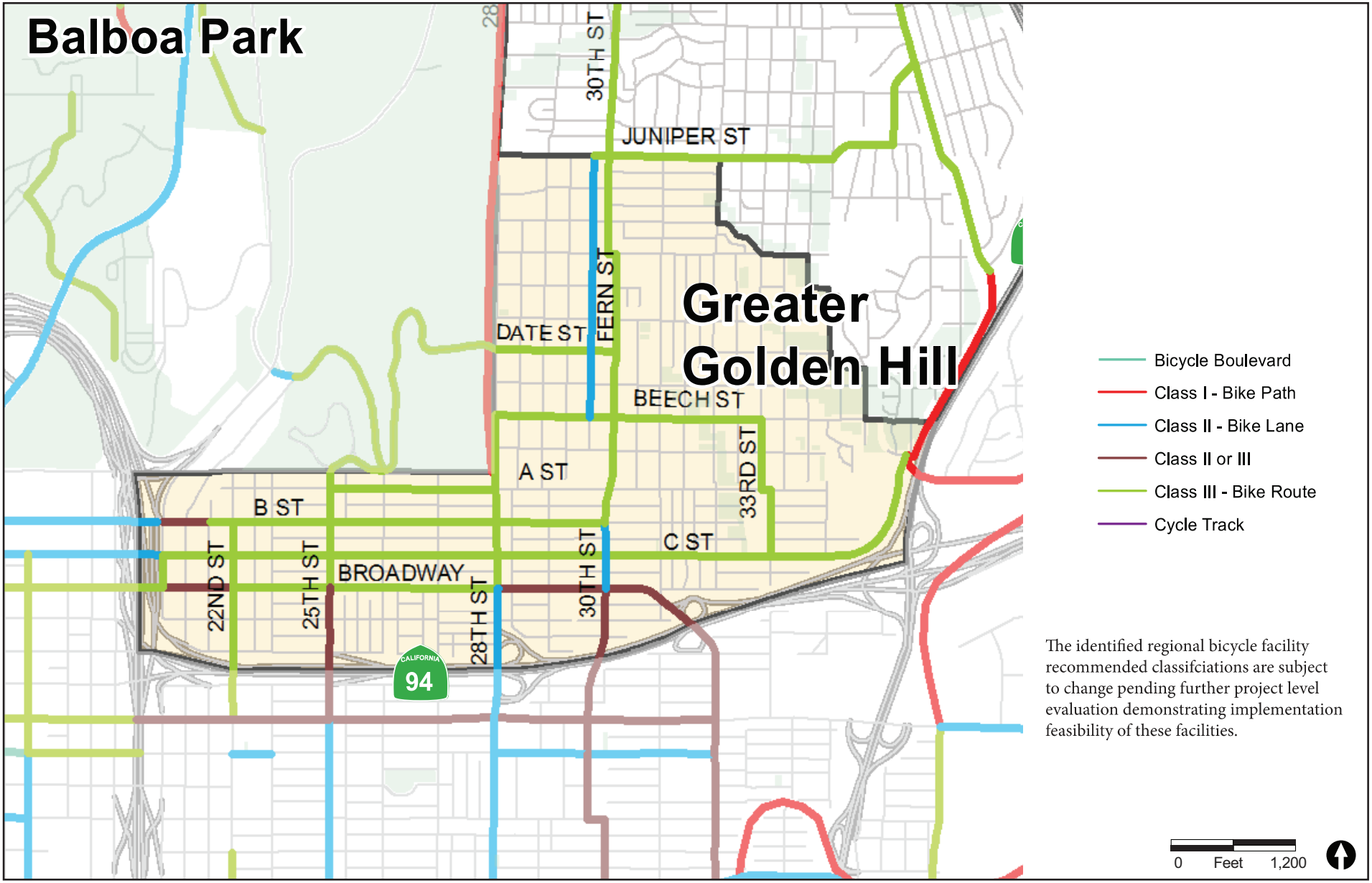


FIGURE 7.3-4
Regional Bicycle Plan – Golden Hill

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Map Source: SanGIS

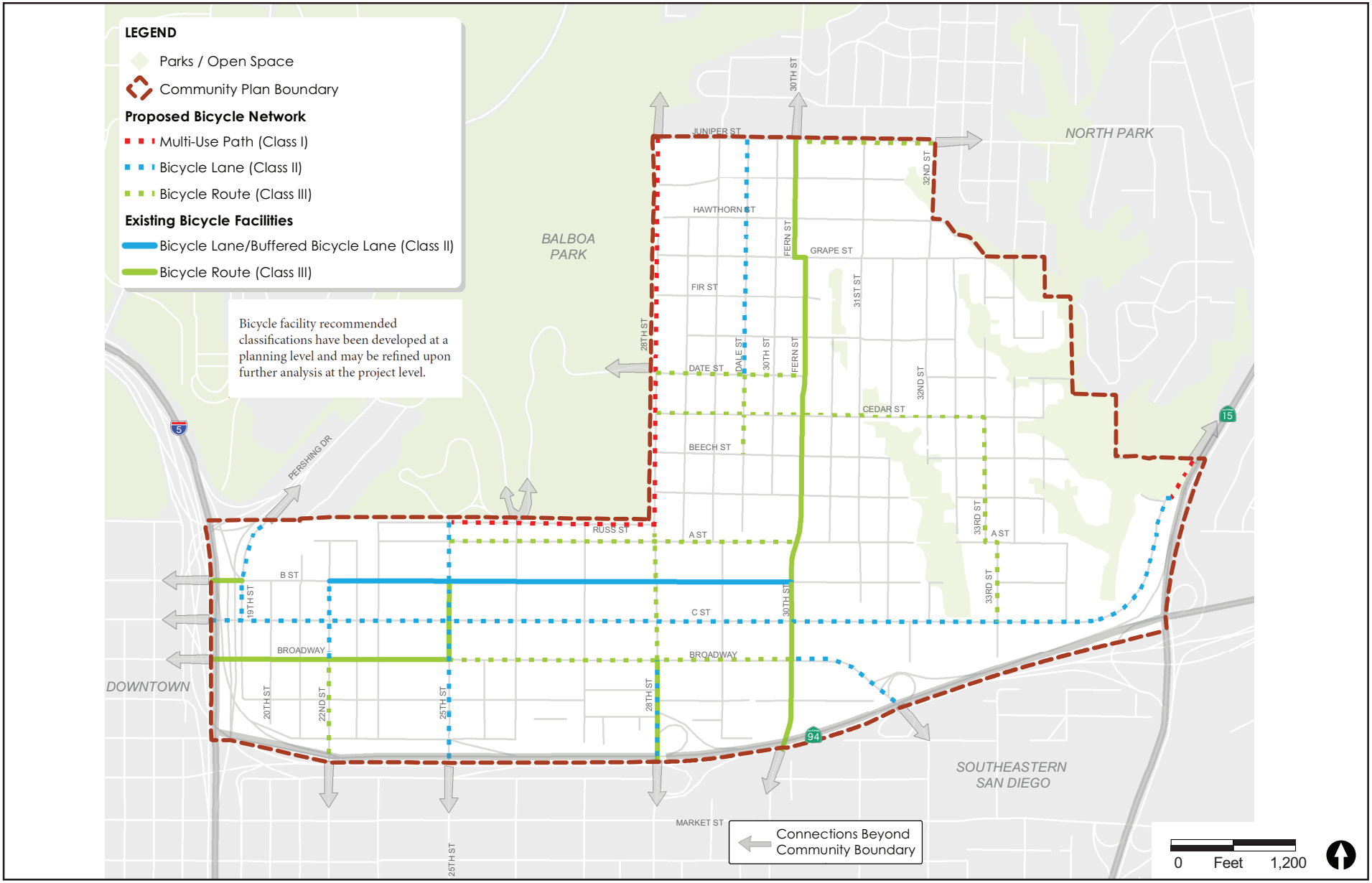


FIGURE 7.3-5

Existing and Planned Bicycle Networks – Golden Hill

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7.3.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to Transportation and Traffic are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed Golden Hill CPU. A significant impact could occur if implementation of a proposed CPU would:

1) Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps;

2) Conflict with adopted policies, plans, or programs supporting alternative transportation.

The City of San Diego and Caltrans have developed acceptable threshold standards to determine the significance of project impacts to intersections, roadway segments, freeway segments, and freeway ramp metering. At intersections, the measurement of effectiveness (MOE) is based on allowable increases in delay. Along roadway segments and freeway segments, the MOE is based on allowable increases in the volume-to-capacity (v/c) ratio. At a freeway ramp meter, the MOE is based on allowable increases in delay, measured in minutes. These thresholds, applicable to the analysis of transportation facilities (Issue 1) are summarized in Table 7.3-6 and further detailed below.

Table 7.3-6
Significance Criteria for Facilities in Study Area

Facility	Measures of Effectiveness (MOE)	Significance Threshold[1]
Intersection	Seconds of Delay	> 2.0 seconds at LOS E or > 1.0 second at LOS F
Roadway Segment	ADT, v/c ratio	> 0.02 at LOS E or > 0.01 at LOS F
Freeway Segment	v/c ratio	> 0.01 at LOS E or > 0.005 at LOS F
Freeway Ramp Meter	Minutes of delay per vehicle	> 2.0 minutes for freeway segments operating at LOS E, and >1.0 minutes for freeway segments operating at LOS F. The criteria only apply for ramp meters where the delay without project is 15 minutes or higher.

v/c = volume to capacity ratio
LOS = Level of Service
[1]Applies only when the facilities operates at LOS E or F
Source: City of San Diego Significance Determination Thresholds, 2011; Kimley Horn Traffic Impact Study, Appendix C

a. Signalized and Unsignalized Intersections

LOS F is not acceptable for any approach leg except for side streets on an interconnected arterial system. If vehicle trips from a project cause an intersection approach leg to operate at LOS F, except

in the cases of side streets on an interconnected arterial system, this would be considered a significant project traffic impact. At intersections that are expected to operate at LOS E or F without the project, the allowable increase in delay is two seconds at LOS E and one second at LOS F with the addition of the project. If vehicle trips from a project cause the delay at an intersection to increase by more than the allowable threshold, this would be considered a significant project impact. Also, if the project causes an intersection that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant project impact.

b. Roadway Segments

For roadway segments that are forecasted to operate at LOS E or F with the project, the allowable increase in v/c ratio is 0.02 at LOS E and 0.01 at LOS F. If vehicle trips from a project cause the v/c ratio to increase by more than the allowable threshold, this would be considered a significant project traffic impact. Also, if the project causes a street segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

Where the roadway segment operates at LOS E or F, if the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the project; and a peak hour HCM arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the project; then the project impacts would be less than significant. If analysis shows either the intersections or segment under the peak hour HCM analysis do not operate acceptably, the project impacts would be significant.

In certain instances, mitigation may not be required even if a roadway segment operates at LOS E or LOS F. In such cases the following three conditions must all be met:

1. The roadway is built to its ultimate classification per the adopted community plan;
2. The intersections on both ends of the failing segment operate at an acceptable LOS; and
3. An HCM arterial analysis indicates an acceptable LOS on the segment.

c. Freeway Segments

For freeway segments that are forecasted to operate at LOS E or F with the project, the allowable increase in v/c ratio is 0.01 at LOS E and 0.005 at LOS F. If vehicle trips from a project cause the v/c ratio to increase by more than the allowable threshold, this would be considered a significant project traffic impact. Also, if the project causes a freeway segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

d. Freeway Ramp Metering

Ramp metering is a means of controlling the volume of traffic entering the freeway with the goal of improving the traffic operations and flow on the freeway main lanes. Freeway ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at the given location. The excess demand, if any, forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Substantial queues and delays can form where demand significantly exceeds the meter rate. This approach assumes a static meter

rate throughout the course of the peak hour. However, Caltrans has indicated that the meter rates are continually adjusted based on the level of traffic using the on-ramp. To the extent possible, the meter rate is set such that the queue length does not exceed the available storage, smooth flows on the freeway mainline is maintained, and there is no interference to arterial traffic.

If vehicle trips from a project cause a metered ramp with a delay of 15 minutes per vehicle or higher to increase its delay by more than two minutes per vehicle, this would be considered a significant project traffic impact if the freeway segment operates at LOS E or F.

7.3.3 Impact Analysis

Issue 1 Traffic Circulation

Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?

a. Traffic Volumes

The future community build-out conditions were developed based on proposed North Park CPU build-out land use and network assumptions within the North Park Community Plan area and superimposed on SANDAG 2035 regional model. Model adjustments were incorporated to provide consistency with vehicular traffic counts collected for the proposed North Park CPU and expected traffic patterns within the North Park, Golden Hill and Uptown CPU areas. These adjustments included the following:

- For roadway segments where the difference between the calibrated existing 2008 model and the actual count exceeded ten percent or 2,000 daily vehicles, the difference was subtracted or added to the Year 2035 forecast model to adjust the future volume based on the discrepancy noted between base year model volumes and count data. For roadway segments that have existing daily volumes less than 5,000, no adjustments were applied to the future model volumes.

The resulting daily traffic volumes for the Golden Hill community for Future Year are presented in Figure 7.3-6.

Map Source: Kimley Horn

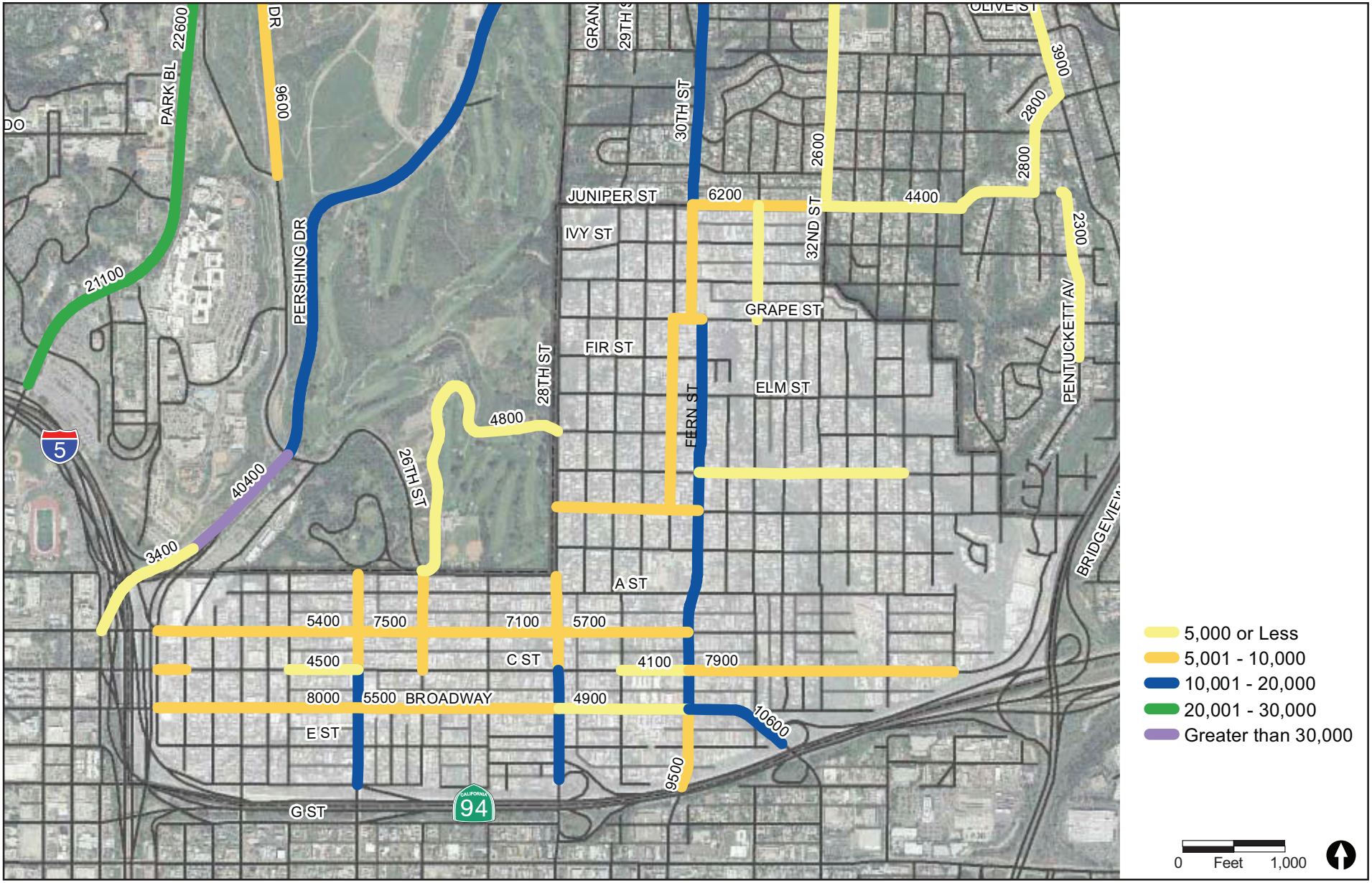


FIGURE 7.3-6

Build-out Proposed Land Use

Roadway Segment ADT Volumes – Golden Hill

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b. Intersection Analysis

Table 7.3-7 displays the LOS analysis results for the study intersections using existing lane configuration and the future peak-hour traffic volumes. As shown in Table 7.3-7, the proposed Golden Hill CPU would have a cumulative traffic related impact at six of the 12 study intersections.

Impact 7.3-1 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of B Street and 17th Street/I-5 SB Off-Ramp in the AM peak hour.

Impact 7.3-2 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of SR-94 WB Ramps and Broadway in the AM and PM peak hours.

Impact 7.3-3 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of SR-94 WB Ramps and 28th Street in the AM and PM peak hours.

Impact 7.3-4 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of SR-94 EB Ramps and 28th Street in the AM and PM peak hours.

Impact 7.3-5 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of F Street and 25th Street in the AM and PM peak hours.

Impact 7.3-6 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the intersection of G Street and 25th Street in the AM and PM peak hours.

Table 7.3-7
Build-out Summary of Intersection Analysis - Golden Hill

Intersection		Traffic Control	Peak Hour	Existing		Build-out			
				Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ(c)	Significant?
1	B St & 17th St/I-5 SB Off-Ramp	One-Way Stop	AM	130.7	F (SB TR)	ECL	F (SB TR)	--	YES
			PM	29.3	D (SB TR)	20.4	C (SB TR)	-7.9	NO
2	B St & I-5 NB Off-Ramp	No Conflicting Movements	AM	N/A	N/A	N/A	N/A	N/A	N/A
			PM	N/A	N/A	N/A	N/A	N/A	N/A
3	B St & 19th St/I-5 NB On-Ramp	Signal	AM	9.4	A	11.2	B	1.8	NO
			PM	6.8	A	7.1	A	0.3	NO
4	C St & 17th St	One-Way Stop	AM	13.7	B (SB TR)	14.3	B (SB TR)	0.6	NO
			PM	23.3	C (SB TR)	32.6	D (SB TR)	9.3	NO
5	Broadway & 30th St	Signal	AM	14.2	B	14.6	B	0.4	NO
			PM	11.9	B	14.3	B	2.4	NO
6	SR-94 WB Ramps & Broadway	One-Way Stop	AM	63.0	F (WB L)	187.5	F (WB L)	124.5	YES
			PM	55.3	F (WB L)	185.9	F (WB L)	130.6	YES
7	SR-94 WB Ramps & 28th St	Two-Way Stop	AM	46.6	E (WB LT)	ECL	F (WB LT)	--	YES
			PM	370.9	F (WB LT)	883.9	F (WB LT)	513.0	YES
8	SR-94 EB Ramps & 28th St	One-Way Stop	AM	26.7	D (WB L)	245.3	F (WB L)	217.6	YES
			PM	507.0	F (WB L)	ECL	F (WB L)	--	YES
9	F St & 22nd St	All-Way Stop	AM	13.6	B	17.4	C	3.8	NO
			PM	7.6	A	7.7	A	0.1	NO
10	F St & 25th St	All-Way Stop	AM	20.8	C	82.3	F	61.5	YES
			PM	16.2	C	39.4	E	23.2	YES
11	G St & 22nd St	All-Way Stop	AM	9.6	A	10.4	B	0.8	NO
			PM	9.4	A	10.1	B	0.7	NO
12	G St & 25th St	All-Way Stop	AM	12.4	B	55.2	F	42.8	YES
			PM	16.0	C	67.0	F	52.0	YES

Notes:
Bold values indicate intersections operating at LOS E or F.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 180 seconds.
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a one-way or two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the 2000 Highway Capacity Manual and performed using Synchro 8
(c) Δ = change in delay. Delay in Build-out – Existing Delay

c. Roadway Segment Analysis

Table 7.3-8 displays the LOS analysis results for roadway segments within the Golden Hill community using existing roadway classifications and the future peak-hour traffic volumes for those roadways. As shown in Table 7.3-8, the proposed Golden Hill CPU would have a cumulative traffic related impact on 13 of the 32 roadway segments within the study area. Where impacts occur on consecutive segments of a roadway, these impacts have been combined for clarity.

Impact 7.3-7 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to 25th Street from Broadway to F Street.

Impact 7.3-8 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive street segments of 28th Street from Russ Boulevard to SR-94.

Impact 7.3-9 The proposed CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive segments of 30th Street from Grape Street to SR-94.

Table 7.3-8 Build-out Summary of Roadway Segment Analysis – Golden Hill											
			Existing			Buildout					
Roadway Segment	Roadway Functional Classification	LOS E Capacity	ADT	V/C Ratio (a)	LOS	ADT	V/C Ratio (a)	LOS	Δ in ADT	Δ in V/C	Sig?
25th Street											
Russ Blvd to B St	2 Lane Collector (continuous left-turn lane)	15,000	7,550	0.503	C	7,800	0.520	C	250	0.017	NO
B St to Broadway	4 Lane Collector (no center lane)	15,000	9,409	0.627	C				1,491	0.100	NO
	2 Lane Collector (continuous left-turn lane)	15,000				10,900	0.727	D			
Broadway to F St	4 Lane Collector (no center lane)	15,000	12,105	0.807	D				5,295	0.353	**YES**
	2 Lane Collector (continuous left-turn lane)	15,000				17,400	1.160	F			
26th Street											
Russ Blvd to B St	2 Lane Collector (no center lane)	8,000	9,152	1.144	F	9,152	1.144	F	0	0.000	NO
B St to C St	2 Lane Collector (no center lane)	8,000	2,146	0.268	A	5,100	0.638	D	2,954	0.370	NO
28th Street											
Russ Blvd to C St	2 Lane Collector (no center lane)	8,000	4,888	0.611	C	8,800	1.100	F	3,912	0.489	**YES**
C St to Broadway	2 Lane Collector (no center lane)	8,000	8,150	1.019	F	10,500	1.313	F	2,350	0.294	**YES**
Broadway to SR-94	2 Lane Collector (no center lane)	8,000	10,697	1.337	F	19,100	2.388	F	8,403	1.051	**YES**
30th Street											
Grape St to Ash St	2 Lane Collector (no center lane)	8,000	3,865	0.483	C	6,900	0.863	E	3,035	0.380	**YES**
A St to Broadway	2 Lane Collector (no center lane)	8,000	16,610	2.076	F	19,800	2.475	F	3,190	0.399	**YES**
Broadway to SR-94	2 Lane Collector (no center lane)	8,000	4,210	0.526	C	9,500	1.188	F	5,290	0.662	**YES**
31st Street											
Juniper St to Grape St	2 Lane Collector (no center lane)	8,000	2,299	0.287	A	4,700	0.588	C	2,401	0.301	NO
B Street											
19th St to 20th St	4 Lane Collector (no center lane)	15,000	5,372	0.358	B	6,500	0.433	B	1,128	0.075	NO
20th St to 25th St	2 Lane Collector (no center lane)	8,000	3,708	0.464	C	5,400	0.675	D	1,692	0.211	NO
25th St to 26th St	2 Lane Collector (no center lane)	8,000	4,600	0.575	C	7,500	0.938	E	2,900	0.363	**YES**
26th St to 28th St	2 Lane Collector (no center lane)	8,000	6,200	0.775	D	7,100	0.888	E	900	0.113	**YES**
28th St to 30th St	2 Lane Collector (no center lane)	8,000	2,713	0.339	B	5,700	0.713	D	2,987	0.374	NO
Beech Street											
28th St to Fern St	2 Lane Collector (no center lane)	8,000	1,770	0.221	A	6,200	0.775	D	4,430	0.554	NO
Broadway Street											
19th St to 20th St	2 Lane Collector (continuous left-turn lane)	15,000	5,788	0.386	B	6,000	0.400	B	212	0.014	NO
20th St to 25th St	2 Lane Collector (continuous left-turn lane)	15,000	4,867	0.324	A	8,000	0.533	C	3,133	0.209	NO
25th St to 28th St	2 Lane Collector (continuous left-turn lane)	15,000	4,165	0.278	A	5,500	0.367	B	1,335	0.089	NO
28th St to 30th St	2 Lane Collector (continuous left-turn lane)	15,000	3,279	0.219	A	4,900	0.327	A	1,621	0.108	NO
30th St to SR-94	2 Lane Collector (no center lane)	8,000	15,881	1.985	F	15,811	1.976	F	-70	-0.009	NO

Table 7.3-8
Build-out Summary of Roadway Segment Analysis – Golden Hill

Roadway Segment	Roadway Functional Classification	LOS E Capacity	Existing			Buildout			Δ in ADT	Δ in V/C	Sig?
			ADT	V/C Ratio (a)	LOS	ADT	V/C Ratio (a)	LOS			
C Street											
19th St to 20th St	1 Lane Collector (one-way)	7,5000	3,827	0.510	C	6,100	0.813	D	2,273	0.303	NO
20th St to 25th St	2 Lane Collector (continuous left-turn lane)	15,000	3,923	0.260	A	4,500	0.300	A	577	0.038	NO
25th St to 28th St	2 Lane Collector (continuous left-turn lane)	15,000	--	--	--	5,500	0.367	B	--	--	--
28th St to 30th St	2 Lane Collector (continuous left-turn lane)	15,000	2,658	0.177	A	4,100	0.273	A	1,442	0.096	NO
30th St to 34th St	2 Lane Collector (no center lane)	8,000	4,230	0.530	C	7,900	0.988	E	3,670	0.459	**YES**
Cedar Street											
Fern St to Felton St	2 Lane Collector (no center lane)	8,000	2,815	0.352	B	3,400	0.425	B	585	0.073	NO
Fern Street											
Juniper St to Grape St	2 Lane Collector (no center lane)	8,000	8,350	1.044	F	8,900	1.113	F	550	0.069	**YES**
Grape St to A St	2 Lane Collector (no center lane)	8,000	8,082	1.010	F	15,000	1.875	F	6,918	0.865	**YES**
Grape Street											
30th St to 31st St	2 Lane Collector (no center lane)	8,000	2,614	0.327	B	9,000	1.125	F	6,386	0.798	**YES**

Notes:
Bold values indicate roadway segments operating at LOS E or F.
Capacity for non-standard roadway classifications were provided by City of San Diego staff.
(a) The v/c ratio is calculated by dividing the ADT volume by each respective roadway segment's capacity.
Sig? = Significant?

Impact 7.3-10 The proposed CPU and associated discretionary actions would have a cumulative traffic impact to two consecutive segments of B Street from 25th Street to 28th Street.

Impact 7.3-11 The proposed CPU and associated discretionary actions would have a cumulative traffic impact to C Street from 30th Street to 34th Street.

Impact 7.3-12 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to two consecutive segments of Fern Street from Juniper Street to A Street.

Impact 7.3-13 The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to Grape Street from 30th Street to 31st Street.

d. Freeway Segments and Ramp Meters

Impacts of the Golden Hill CPU to freeway segments and ramp meters are cumulative in nature and would be the same as those identified in Section 6.3.3.d. and e. of this PEIR. The impacts are discussed in more detail in those sections and are summarized below:

Impact 7.3-14: The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to five segments of I-5 from Old Town Avenue to Imperial Avenue.

Impact 7.3-15: The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to three consecutive segments of I-8 between I-5 and SR 125.

Impact 7.3-16: The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to the segment of SR-15 from I-805 to SR-94.

Impact 7.3-17: The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to three segments of I-805 from I-8 to SR-15.

Impact 7.3-18: The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to three segments of SR-94 from 25th Street to SR-15.

Impact 7.3-19: The proposed Golden Hill CPU and associated discretionary actions would have a cumulative traffic impact to three segments of SR-163 from I-8 to I-5.

Impact 7.3-20 Hancock Street to I-5 southbound on-ramp in the PM peak period.

Impact 7.3-21 Kettner Boulevard to I-5 southbound on-ramp in the PM peak period.

Impact 7.3-22 Fifth Avenue to I-5 southbound on-ramp in the PM peak period.

Issue 2 Alternative Transportation

Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?

a. Transit

Planned transit services within the Golden Hill community identified in the ~~2050 RTP~~SANDAG RP and discussed in the Uptown, North Park, and Golden Hill Community Plan Update Mobility Study for Future Year Conditions (Appendix C, Kimley-Horn and Associates, 2015), include streetcar and ~~BRT~~Rapid transit improvements as shown on Figure 7.3-3. Definitions of each of these types of service are provided in Chapter 2.0 of this PEIR. Planned transit routes within the Golden Hill community include ~~BRT~~Rapid transit and streetcar improvements and the changes from existing services are described below:

- Route 2 will convert to ~~be~~ a Rapid bus route along its current route. Route 2 currently provides high frequency local bus service from Downtown San Diego to North Park. Route 2 travels along Broadway, C Street, and 30th Street in the Golden Hill community. The expected year for completion of this improvement is 2030.

- A new bus route, currently designated as route 637, will provide Rapid service from North Park to 32nd Street Trolley station in Barrio Logan. The expected year for completion of this improvement is 2035.

- A new streetcar route, currently designated as route 555, will provide streetcar service from 30th Street to Downtown San Diego. The planned route through Golden Hill defined in the R~~T~~P is along 30th Street north of C Street, along C Street between 25th Street and 30th Street, and along 25th Street between Market Street and C Street. The expected year for completion of this improvement is 2035.

These planned transit changes would not reduce the number of lanes available to personal vehicles. The changes would be schedule and stop modifications for existing buses, and new bus and streetcar service that would share the roadway with personal vehicles.

The proposed Golden Hill CPU and associated discretionary actions would support implementation of the transit improvements identified in the ~~2050~~ R~~T~~P by providing policies that support prioritizing the transit system and improving efficiency of transit services. For example, a number of transit focused Mobility Element Policies are included in the proposed Golden Hill CPU that would support efforts to develop planned transit facilities including working with the Metropolitan Transit System (MTS) and SANDAG to implement transit improvements and provide incentives to promote the use of transit. Thus, implementation of the project would not interfere with implementation of planned transit improvements and would provide policy support to support their implementation. Thus, impacts related to conflicts with existing or planned transit facilities would be less than significant.

b. Bicycle Facilities

The proposed Golden Hill CPU and associated discretionary actions would support existing plans and policies relative to the bicycle network. The build out of the proposed bicycle network would expand the bicycle routes through the community and provide two new multi-use paths. Many of the other planned facilities are upgraded facilities to existing routes. The ultimate plan for the community provides numerous intra-community connections, with several options to go east-west or north- south.

The proposed Golden Hill CPU would be consistent with adopted policies, plans, or programs supporting alternative transportation models. Additionally, the proposed Golden Hill CPU would provide for or accommodate future provision of improvements to alternative transportation models. No impact would result and no mitigation measures are required.

c. Pedestrian Facilities

There are no major planned and funded pedestrian facility improvement projects for the Golden Hill community. However, the proposed Golden Hill CPU Mobility Element includes a number of policies that support enhancements to pedestrian travel routes within the CPU area. Implementation of the proposed Golden Hill CPU and associated discretionary actions would not restrict or impede pedestrian connectivity and would not conflict with any adopted policies or plans addressing pedestrian facilities. Thus, impacts would be less than significant.

7.3.4 Significance of Impacts

The following cumulative impacts to intersections, roadway segments, freeway segments, and ramp meters were determined to be significant:

Issue 1 Traffic Circulation

a. Intersections

- B Street & 17th Street/ I-5 SB Off-Ramp (Impact 7.3-1)
- SR-94 WB Ramps & Broadway (Impact 7.3-2)
- SR-94 WB Ramp & 28th Street (Impact 7.3-3)
- SR-94 EB Ramp & 28th Street (Impact 7.3-4)
- F Street & 25th Street (Impact 7.3-5)
- G Street & 25th Street (Impact 7.3-6)

b. Roadway Segments

- 25th Street: Broadway to F Street (Impact 7.3-7)
- 28th Street: Russ Boulevard to SR-94 (Impact 7.3-8)
- 30th Street: Grape Street to SR-94 (Impact 7.3-9)
- B Street: 25th Street to 28th Street (Impact 7.3-10)
- C Street: 30th Street to 34th Street (Impact 7.3-11)

- Fern Street: Juniper Street to A Street (Impact 7.3-12)
- Grape Street: 30th Street to 31st Street (Impact 7.3-13)

c. Freeway Segments

- I-5 from Old Town Avenue to Imperial Avenue (Impact 7.3-14)
- I-8 from Hotel Circle West to SR-15 (Impact 7.3-15)
- SR-15 from I-805 to SR-94 (Impact 7.3-16)
- I-805 from I-8 to SR-15 (Impact 7.3-17)
- SR-94 from 25th Street to SR-15 (Impact 7.3-18)
- SR-163 from I-8 to I-5 (Impact 7.3-19)

d. Ramp Meters

- Hancock Street to I-5 southbound on-ramp in the PM peak period (7.3-20)
- Kettner Boulevard to I-5 southbound on-ramp in the PM peak period (7.3-21)
- Fifth Ave to I-5 southbound on-ramp in the PM peak period (7.3-22)

Issue 2 Alternative Transportation

The proposed Golden Hill CPU and associated discretionary actions would be consistent with adopted policies, plans, or programs supporting alternative transportation. Additionally, the proposed CPU and associated discretionary actions would provide policies that support improvements to pedestrian, bicycle, and transit facilities. Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans or programs supporting alternative transportation and no mitigation is required.

7.3.5 Mitigation Framework

The TIS identified improvements that would mitigate or reduce roadway segment and intersection impacts. The improvements that are ultimately recommended as part of the Golden Hill CPU are included in the IFS. However, in most cases, the improvements that would mitigate or reduce vehicular impacts were not recommended as part of the Golden Hill CPU in order to maintain consistency with the overall mobility vision and other policies of the Golden Hill CPU. Of the measures listed below, five are included in the proposed IFS: measures TRANS 7.3-1 through TRANS 7.3-6, TRANS 7.3-8b, TRANS 7.3-9b and TRANS 7.3-9c~~–~~.

7.3.5.1 Intersections

~~While the~~The following ~~roadway segment~~improvements that ~~mitigation measures~~ would reduce potentially significant intersection impacts~~, only measures TRANS 7.3-1 through TRANS 7.3-6~~ are proposed as part of the Golden Hill CPU and associated discretionary actions and ~~are~~ included within the proposed IFS.

TRANS 7.3-1 B Street & 17th Street/I-5 SB Off-Ramp (Impact 7.3-1): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS.

TRANS 7.3-2 SR-94 WB Ramps & Broadway (Impact 7.3-2): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS.

TRANS 7.3-3 SR-94 WB Ramps & 28th Street (Impact 7.3-3): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS.

TRANS 7.3-4 SR-94 EB Ramps & 28th Street (Impact 7.3-4): Install traffic signal control at the intersection. Restripe the southbound approach to have an exclusive left-turn lane and a through lane. This improvement project is identified in the Golden Hill IFS.

TRANS 7.3-5 F Street & 25th Street (Impact 7.3-5): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS.

TRANS 7.3-6 G Street & 25th Street (Impact 7.3-6): Install traffic signal control at the intersection. This improvement project is identified in the Golden Hill IFS.

7.3.5.2 Roadway Segments

While the following roadway segment mitigation measures would reduce potentially significant impacts, only measures TRANS 7.3-8b, TRANS 7.3-9b, and TRANS7.3-9c are ~~proposed as part of the Golden Hill CPU and associated discretionary actions and are~~ included within the proposed IFS.

TRANS 7.3-7 25th Street from Broadway to F Street (Impact 7.3-7): Widen the roadway to a 4 lane collector.

TRANS 7.3-8 28th Street (Impact 7.3-8)

a. Russ Boulevard to Broadway: Restripe the roadway to have a continuous left-turn lane.
b. Broadway to SR-94: Widen the roadway to a 4-lane collector. However, partial mitigation is proposed at this location with the widening of the roadway to a two-lane collector with continuous left-turn lane. This improvement project is identified on the Golden Hill IFS.

TRANS 7.3-9 30th Street from Grape Street to SR-94 (Impact 7.3-9)

a. Grape Street to Ash Street: Restripe the roadway to have a continuous left- turn lane.
b. A Street to Broadway: Widen the roadway to a 4 lane collector. However, partial mitigation is proposed at this location with the widening of the roadway to a two lane collector with continuous left-turn lane. This improvement project is identified on the Golden Hill IFS.
c. The proposed Broadway to SR-94: Widen roadway to a 2 lane collector with continuous left-turn lane. This improvement project is identified on the Golden Hill IFS.

TRANS 7.3-10 B Street from 25th Street to 28th Street (Impact 7.3-10): Restripe the roadway to have a continuous left-turn lane.

TRANS 7.3-11 C Street from 30th Street to 34th Street (Impact 7.3-11): Restripe the roadway to have a continuous left-turn lane.

TRANS 7.3-12 Fern Street from Juniper to A Street (Impact 7.3-12)

a. Juniper to Grape Street: Restripe the roadway to have a continuous left-turn lane.
b. Grape Street to A Street: Widen the roadway to a 4-lane collector.

TRANS 7.3-13 Grape Street from 30th Street to 31st Street (Impact 7.3-13): Restripe the roadway to have a continuous left-turn lane.

7.3.5.3 Freeway Segments

~~No mitigation measures are identified for impacts to freeways because freeway improvements are not within the authority of the City.~~ The improvements identified in SANDAG's RP~~RTP~~ would improve operations along the freeway segments and ramps; however, to what extent is still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. However, the City will continue to coordinate with Caltrans and SANGAG, as future project-level developments proceed, to develop potential "fair share" multi-modal mitigation strategies for freeway impacts, as appropriate. The following are the freeway mainline improvements identified in SANDAG's R~~T~~P:

TRANS 7.3-14 I-5 northbound and southbound from Old Town Avenue to Imperial Avenue (Impact 7.3-14: ~~SANDAG's 2050 Revenue Constrained RTP includes operational improvements along I-5 between Old Town Avenue and Imperial Avenue. This project is expected to be constructed by year 2050. This measure provides partial mitigation, since it improves freeway operation in the vicinity of the project.~~ No improvements are identified for this segment in SANDAG's RP.

TRANS 7.3-15 I-8 eastbound and westbound from Hotel Circle (W) to SR-15 (Impact 7.3-15): SANDAG's ~~2050 Revenue Constrained~~ R~~T~~P includes operational improvements along

I-8 between I-15 and SR-125 (expected to be constructed by 2040) and between I-5 and I-15 (expected to be constructed by 2050)~~Hotel Circle (W) and SR-15~~. This project is expected to be constructed by year 2050. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project.

TRANS 7.3-16 SR-15 northbound and southbound from I-805 to SR-94 (Impact 7.3-16): SANDAG's ~~2050 Revenue Constrained~~ RT~~T~~P proposes the construction of managed lanes along SR-15 from I-5 to I-805 and from I-8 to SR-163.~~between I-805 and SR-94. This project is expected to be constructed by year 2035.~~ This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane.

TRANS 7.3-17 I-805 northbound and southbound from I-8 to SR-15 (Impact 7.3-17): SANDAG's ~~2050 Revenue Constrained~~ RT~~T~~P proposes the construction of managed lanes along I-805 between ~~I-8 and~~ SR-15 ~~to~~and SR-52. This project is expected to be constructed by year 2030. This measure provides partial mitigation, since it reduces the traffic demand on the freeway general purpose lane.

TRANS 7.3-18 SR-94 eastbound and westbound from 25th Street to SR-15 (Impact 7.3-18): SANDAG's ~~2050 Revenue Constrained~~ RT~~T~~P proposes the construction of managed lanes along SR-94 between I-5 ~~to~~and SR-125.~~25th Street and SR-15. This project is expected to be constructed by year 2020~~ Caltrans is evaluating alternatives to this measure as part of the environmental analysis for the SR-94 Express Lanes Project, including bus on shoulders and other multi-modal projects outlined in the Community Based Alternatives of the SR-94 Express Lanes Project. This measure (or an alternative measure) would~~. This measure~~ provide~~s~~ partial mitigation, since it would reduce~~s~~ the traffic demand on the freeway general purpose lanes.

TRANS 7.3-19 SR-163 northbound from I-8 to Robinson Avenue and SR-163 southbound from I-8 to I-5 (Impact 7.3-19): No improvements are identified for this state route segment in SANDAG's ~~2050~~ RT~~T~~P.

At the project-level, significant impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of transportation demand management (TDM) measures that encourage carpooling and other alternative means of transportation consistent with proposed CPU policies. Fair-share contributions could also be provided toward the construction of the following projects that are included in SANDAG's RP:

- Operational improvements along I-8 between I-5 to SR-15 (TRANS 7.3-15)
- Construction of managed lanes along SR-15 between I-805 and SR-94 (TRANS 7.3-16)
- Construction of managed lanes along I-805 between SR-8 to SR-163 (TRANS 7.3-17)
- Construction of managed lanes along SR-94 between I-5 to I-805 (TRANS 7.3-18)

7.3.5.4 Ramp Meters

TRANS 7.3-20 The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations (Impacts 7.3-20 through 7.3-22). Improvements could

include additional lanes, interchange reconfiguration, etc.; however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. At the project-level, significant impacts at locations outside of the jurisdiction of the City could be partially mitigated in the form of fair-share contribution or TDM measures that encourage carpooling and other alternative means of transportation consistent with proposed CPU policies. Fair-share contributions may be provided at the project-level for impacted ramps where the impacted facility is included in SANDAG's RP; however, at this time none of the impacted ramps are included in SANDAG's RP.

7.3.6 Significance after Mitigation

While implementation of the mitigation measures identified above would reduce impacts to less than significant at many of the intersections and roadway segments, only mitigation measures TRANS 7.3-1 through TRANS 7.3-6, TRANS 7.3-8b, TRANS 7.3-9b and TRANS 7.3-9c are included within the proposed Golden Hill CPU and IFS. It is not likely that mitigation measures not included in the IFS would be implemented based on the lack of a funding mechanism and in some cases due to inconsistency of the recommended measure with the mobility goals of the proposed Golden Hill CPU.

TRANS 7.3-1 through TRANS 7.3-6, TRANS 7.3-8b, TRANS 7.3-9b, and TRANS 7.3-9c would be included in the IFS; however, full implementation of these measures cannot be guaranteed because the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring. Thus, impacts 7.3-1through 7.3-4, 7.3-8b, TRANS 7.3-9b, and 7.3-9c would remain significant and unavoidable.

Likewise, impacts to Caltrans facilities (freeway segments and ramps, Impacts 7.3-14 through 7.3-22) would remain significant and unmitigated because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur.

7.4 Air Quality

An Air Quality Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates (CPUs) was prepared by RECON (May 16, 2016). This report addresses air quality impacts associated with the proposed Golden Hill CPU and associated discretionary actions. The report is included as Appendix D to this draft Program Environmental Impact Report and forms the basis for the discussion in this section.

7.4.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

7.4.2 Significance Determination Thresholds

CEQA Guidelines

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G, the City of San Diego Significance Determination Thresholds (2011), and applicable air district standards described below. Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed Golden Hill CPU. A significant impact could occur if implementation of a proposed CPU would:

1) Conflict or obstruct implementation of the applicable air quality plan;

2) Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;

3) Expose sensitive receptors to substantial pollutant concentrations, including toxins; or

4) Create objectionable odors affecting a substantial number of people.

San Diego Air Pollution Control District

a. Air Quality Standards

Regarding question 2 above, the San Diego Air Pollution Control District (APCD) has established trigger levels that determine when a new or modified stationary source would require an air quality analysis. These trigger levels are utilized by the City of San Diego in their Significance Determination

Thresholds (City of San Diego 2011) as one of the considerations when determining the potential significance of air quality impacts for projects within the City. These thresholds would be applicable to future individual development projects implemented within the proposed Golden Hill CPU area. The air quality impact screening levels applicable to future development within the proposed Golden Hill CPU area are shown in Table 7.4-1.

Table 7.4-1
Air Quality Impact Screening Levels

Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
NO_X	25	250	40
SO_X	25	250	40
CO	100	550	100
PM_{10}	--	100	15
Lead	--	3.2	0.6
VOC, ROG	--	137*	15
$PM_{2.5}$	--	100†	--

SOURCE: San Diego APCD, Rule 20.2 (12/17/1998); City of San Diego 2011.
*Volatile organic compound (VOC) threshold based on levels per the South Coast Air Quality Management District (SCAQMD) and Monterey Bay Air Pollution Control District, which have similar federal and state attainment status as San Diego.
†$PM_{2.5}$ threshold developed from the SCAQMD *Final Methodology to Calculate $PM_{2.5}$ and $PM_{2.5}$ Significance Thresholds* (SCAQMD 2006) and the PM_{10} standard of the San Diego APCD.

The above thresholds are applicable to individual development projects and not a program-level analysis such as the proposed Golden Hill CPU and associated discretionary actions. The project-level thresholds are intended to ensure that many individual projects would not obstruct the timely attainment of the national and state ambient air quality standards (AAQS). Generally, discretionary, program-level planning activities, such as general plans, community plans, specific plans, are evaluated for consistency with the local air quality plans as a measure of significance.

b. Air Toxic Emissions

Regarding toxic air emissions (Issue 3), for San Diego APCD permitted projects in general, the APCD does not identify a significant impact if the potential health risks from the proposed project would not exceed the health risk public notification thresholds specified by San Diego APCD Rule 1210. The public notification thresholds are:

- Maximum incremental cancer risks equal to or greater than ten in one million, or
- Cancer burden equal to or greater than 1.0, or
- Total acute non-cancer health hazard index equal to or greater than 1.0, or
- Total chronic non-cancer health hazard index equal to or greater than 1.0.

Therefore, for the purposes of evaluating the potential health risks associated with air toxics, a significant impact would occur if the worst-case incremental cancer risk is greater than or equal to ten in one million, or if the worst-case total acute or chronic health hazard index is greater than or equal to one.

7.4.3 Impact Analysis

Issue 1 Conflicts with Air Quality Plans

Would the project conflict with or obstruct implementation of the applicable air quality plan?

As described in Chapter 5.0, Regulatory Framework, the California Clean Air Act requires that air basins that are designated nonattainment of state AAQS for criteria pollutants prepare and implement plans to attain the standards by the earliest practicable date. The two pollutants addressed in the San Diego Regional Air Quality Strategy (RAQS) are volatile organic compounds (VOC) and oxides of nitrogen (NOx), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the Transportation Control Measures, were most recently adopted in 2009 as the air quality plan for the San Diego Air Basin (SDAB).

The basis for the RAQS is the distribution of population in the region as projected by San Diego Association of Governments (SANDAG). The San Diego APCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that propose development at an intensity equal to or less than population growth projections and land use intensity are inherently consistent. Amending the adopted Community Plan to change development potential would not necessarily result in an inconsistency between the current air quality plans (that are based on the adopted Community Plan) and the proposed Golden Hill CPU. The focus of the RAQS is on emissions from the sources, not the actual land use, projects that propose development that is greater than anticipated in the growth projections warrant further analysis to determine consistency with RAQS and the State Implementation Plan (SIP). The consistency with the RAQS is further evaluated by comparing emissions that would occur under build-out of the adopted Community Plan to the emissions that would occur under build-out of the proposed Golden Hill CPU.

The proposed Golden Hill CPU would change the planned land use mix as follows:

- Increase the projected number of residential units by less than one percent; and
- Decrease the amount of land designated for commercial development by approximately nine percent.

As presented below, future operational emissions under the proposed Golden Hill CPU would be less than future operational emissions under the adopted Community Plan. Thus, because the land use changes associated with the proposed Golden Hill CPU would not result in an effective increase

in operational emissions, the proposed Golden Hill CPU would be consistent with assumptions contained in the RAQS, and impacts would be less than significant.

Issue 2 Air Quality Standards

Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Air quality impacts can result from the construction and operation of a project. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development or local effects stemming from sensitive receivers being placed close to roadways or stationary sources. In the case of the proposed Golden Hill CPU and associated discretionary actions, operational impacts are primarily due to emissions from mobile sources associated with the vehicular travel along the roadways. Construction and operational impacts of the proposed Golden Hill CPU and associated discretionary actions are discussed below.

a. Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

To illustrate the range of potential construction-related air quality impacts from projects that could occur, three hypothetical projects were evaluated in the Air Quality Analysis: a 1.8-acre multi-family residential project, a 25,000-square-foot commercial project, and a 65,000-square-foot light industrial project. The 1.8-acre multi-family development is assumed to consist of the demolition of an existing 5,000-square-foot structure and the construction of a 29-unit multi-family structure. The commercial development is assumed to consist of the demolition of an existing 5,000-square-foot structure and the construction of 25,000 square feet of commercial use. The light industrial development is assumed to consist of the demolition of an existing 5,000-square-foot structure and the construction of 65,000 square feet of industrial use. Although there are no proposed industrial land use designations in the CPU area, the size and scope of these hypothetical projects was selected to reflect typical projects in heavily developed areas such as the Golden Hill area and represents a conservative analysis.

Air emissions were calculated using California Emissions Estimator Model 2013.2.2 (CalEEMod). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. The model estimates mass emissions from two basics sources: construction sources and operational sources (i.e., area and mobile sources). CalEEMod can estimate the required construction equipment when project specific information is unavailable. The estimates are based on surveys performed by the South Coast Air Quality

Management District and the Sacramento Metropolitan Air Quality Management District of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

CalEEMod estimates were used to develop construction scenarios based on typical construction that would occur with build-out of the proposed Golden Hill CPU area. The analysis assumed that standard dust and emission control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with San Diego APCD Rule 55.0, Fugitive Dust Control. An architectural coating VOC limit of 150 grams per liter was used for all interior and exterior coatings to reflect the requirements of San Diego APCD Rule 67.

A summary of the modeling results is shown in Table 7.4-2.

Table 7.4-2
Sample Daily Construction Emissions
(pounds/day)

Pollutant	Residential Project	Commercial Project	Industrial Project	Project-level Threshold
ROG	55	70	91	137
NO_X	29	14	29	250
CO	22	10	22	550
SO_2	0	0	0	250
PM_{10}	4	1	4	100
$PM_{2.5}$	3	1	3	100

NOTE: Due to rounding, the total PM emissions indicated in the CalEEMod output files do not equal the sum of the individual source emissions.

Emissions summarized in Table 7.4-2 are the maximum emissions for each pollutant and that they may occur during different phases of construction. They would not necessarily occur simultaneously. These are, therefore, the worst-case emissions. For assessing the significance of the air quality emissions resulting from construction of the hypothetical projects, the construction emissions were compared to the thresholds shown in the last column of Table 7.4-2. As shown, the hypothetical individual projects would not result in air emissions that would exceed the applicable thresholds. Potential cumulative construction emissions are addressed below.

Typical daily construction emissions are presented to illustrate the potential scope of air impacts for projects that could be constructed under the proposed Golden Hill CPU. Based on this analysis, individual projects constructed as part of build-out of the proposed Golden Hill CPU area would not exceed air quality significance thresholds for construction. Additionally, the regulations at the federal, state, and local level provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. Based on the hypothetical worst case construction emission analysis, emissions associated with

build-out of the proposed Golden Hill CPU and associated discretionary actions at the project level would be less than significant. Ministerial projects would not require a formal environmental review. Generally, ministerial permits require a public official to determine only that the project conforms to applicable zoning and building code requirements and that applicable fees have been paid. These projects are generally smaller in size than those requiring discretionary review and would be smaller than the hypothetical projects evaluated in this analysis. As such, construction-related air quality impacts associated with ministerial projects would be less than significant.

b. Operation

Operation emissions are long term and include mobile and area sources. Sources of operational emissions associated with future projects developed under the proposed Golden Hill CPU and associated discretionary actions include:

- Traffic generated by the project.
- Area source emissions from the use of natural gas, fireplaces, and consumer products.

Air pollutants generated by all land uses within the proposed Golden Hill CPU area were modeled based on average emissions from land use types. For the purposes of this analysis, it was assumed that the land use changes contained in the proposed Golden Hill CPU and associated discretionary actions would be fully constructed in 2035. Actual emissions would vary depending on future projects and regulations within the Golden Hill CPU area.

Program-level air emissions would exceed the City's project-level thresholds; however, project-level standards are not appropriate for a program-level analysis, as the thresholds are conservative and intended to ensure that multiple simultaneous individual projects would not obstruct the timely attainment of the national and state ambient air quality standards. Generally, discretionary, program-level planning activities (such as general plans, community plans, specific plans, etc.) are evaluated for consistency with the local air quality plan. In contrast, project-level thresholds are applied to individual project-specific approvals, such as a proposed development project. Therefore, the analysis of the proposed Golden Hill CPU is based on the future emissions estimates and related to attainment strategies derived from the adopted Community Plan.

At the program level, the analysis looks at the emissions of the proposed Golden Hill CPU in relation to the adopted Community Plan to determine if the emissions would exceed the emissions estimates included in the RAQS to determine whether the proposed Golden Hill CPU would obstruct attainment or result in an exceedance of AAQS that would result in the temporary or permanent exposure of persons to unhealthy concentrations of pollutants. As such, the analysis evaluates the potential for future development within the Golden Hill CPU area to result in, or contribute to, a violation of any air quality standard based on the change in pollutant emissions that would result from build-out of the adopted Community Plan in the year 2035 compared to the emissions resulting from proposed Golden Hill CPU in the year 2035. Table 7.4-3, summarizes the estimated maximum emissions for the proposed Golden Hill CPU by source. As shown in Table 7.4-3, operational emissions associated with the proposed Golden Hill CPU would be lower for all pollutants when compared to the adopted Community Plan.

Table 7.4-3 Total Operational Emissions for the Golden Hill CPU Area							
Condition	Source	Pollutant (pounds per day)					
		ROG	NOX	CO	SO2	PM10	PM2.5
Adopted Community Plan	Area	381	9	755	0	15	15
	Energy	4	34	15	0	3	3
	Mobile	197	328	1,886	7	511	142
	Total	581	370	2,626	7	529	160
Proposed CPU and Discretionary Actions	Area	382	9	759	0	15	15
	Energy	4	34	15	0	3	3
	Mobile	195	325	1,870	7	508	141
	Total	580	368	2,644	7	526	159
Change		*-1*	*-2*	*-12*	*0*	*-3*	*-1*

Further, while emissions associated with build-out of the entire CPU area would exceed the City's project-level thresholds, the Golden Hill CPU would emit fewer pollutants than would occur under the adopted Community Plan. Therefore, the air emissions from build-out of the proposed Golden Hill CPU would not increase air pollutants in the region, would not further increase the frequency of existing violations of federal or state AAQS, or result in new exceedances. Air quality impacts associated with the adoption of the proposed Golden Hill CPU would result in less than significant impacts.

Issue 3 Sensitive Receptors

Would the project expose sensitive receptors to substantial pollutant concentrations, including toxins?

a. Localized Carbon Monoxide Hot Spots Impacts

The traffic study concluded that six intersections in the proposed Golden Hill CPU area would operate at Level of Service (LOS) E or worse. All six of these intersections are unsignalized. Based on the CO Protocol, the three worst signalized intersections in the Golden Hill CPU area should be selected for a detailed carbon monoxide (CO) hot spot analysis. As no signalized intersection within the Golden Hill CPU area would operate at LOS E or worse, a CO hot spot assessment was not warranted. Based on the projected LOS for signalized intersections within the CPU area, there would be no harmful concentrations of CO within the Golden Hill CPU area. Localized air quality emissions would be less than significant.

b. Toxic Air Emissions

An assessment was completed to evaluate the potential effects associated with placing sensitive land uses in the vicinity of existing sources of air pollution. In the case of the proposed Golden Hill CPU and associated discretionary actions, this source of air pollution is vehicle traffic on freeways Therefore, this assessment discloses the maximum potential health risks (residential and worker) within the Golden Hill CPU area due to these existing external sources.

Stationary Sources

The proposed Golden Hill CPU and associated discretionary actions include land uses that may generate air pollutants affecting adjacent sensitive land uses. In air quality terms, individual land uses that emit air pollutants in sufficient quantities are known as stationary sources. The primary concern with stationary sources is local; however, they also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources are regulated by the local air pollution control or management district through the issuance of permits; in this case, the agency is the San Diego APCD.

The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In accordance with Assembly Bill 2588, if adverse health impacts exceeding public notification levels are identified, the facility would provide public notice, and if the facility poses a potentially significant public health risk, the facility must submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Thus, with this regulatory framework, at the program level, impacts associated with stationary sources in the Golden Hill CPU area would be less than significant.

Mobile Sources

Unlike stationary sources, local agencies, such as the San Diego APCD, do not regulate roadways as emission sources. While the California Air Resources Board (CARB) regulates vehicle emissions and fuel formulations, the source of the majority of diesel particulate matter (DPM) is regulated nationwide by the U.S. Environmental Protection Agency. To determine the exposure of sensitive receptors to DPM within the Golden Hill CPU area, a single AERMOD run was created for all freeway sources in the Golden Hill CPU area. The results provide the total average annual DPM concentrations at each modeled grid receiver. The resulting total average annual DPM concentrations were then used to calculate the incremental cancer risk and chronic health hazard index at each receiver. AERMOD input and output data results are discussed below.

Carcinogenic Risk

There is no adopted standard for evaluating the DPM emission impacts due to vehicles traveling on local roadway and freeways. Therefore, the significance threshold of ten in one million was used in evaluating the potential impacts from vehicular sources. DMP concentrations can be equated to carcinogenic risk to determine significance of an impact. Carcinogenic health risk is determined by calculating lifetime average daily exposure based on a variety of factors such as respiration rate, body weight and pollutant concentration. Specific methodology for determining carcinogenic risk is described in the Air Quality Analysis, Section 5.0 (Appendix D).

The average annual concentration of diesel particulates at each modeled receiver was calculated using air dispersion models as detailed in Section 5.3.2.2 of the Air Quality Analysis (Appendix D). Contours of the particulate matter less than 10 microns in diameter (PM_{10}) annual maximum annual concentrations for the Golden Hill CPU are shown in Figure 7.4-1.

Image source: SanGIS (flown May 2012)

Golden Hill Community Plan Boundary

PM10 Annual Concentration
Maximum Level

- 0.00003
- 0.00004
- 0.00005
- 0.00007
- 0.00009
- 0.0001
- 0.0002

Maximum Exposed Individual Worker

Maximum Exposed Individual Resident

0 Feet 800

FIGURE 7.4-1

2035 Annual PM Concentrations
from Freeway Operations – Golden Hill

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The results of the assessment indicate that the worst-case residential incremental increase in cancer risk due to DPM emissions associated with increased traffic on local freeways in the Golden Hill CPU area is 0.29 in one million and occurs in proximity to the Interstate 15 and State Route 94 interchange. The location of the Golden Hill maximally exposed individual resident and maximally exposed individual worker are shown in Figure 7.4-1. The locations of maximum concentrations higher than the maximally exposed individual resident and maximally exposed individual worker occur within the Interstate 5 right-of-way. This high-end residential incremental cancer risk is less than the significance threshold of ten in one million. Exposure associated with the 65th percentile, 80th percentile, and worker incremental cancer risks at this location would be less than the 95th percentile value. Therefore, incremental increase in cancer risks to sensitive receivers would be less than significant.

Chronic Risk

Chronic risk is a long-term, non-carcinogenic health risk. Characterization of these risks is performed by comparing the estimated annual air concentrations of the substance (pollutant) to a reference exposure level. A chronic hazard quotient is obtained by dividing the average annual concentration by the reference exposure level. The hazard index provides a measure of total potential chronic non-carcinogenic health effects and is calculated for each receiver by summing the hazard quotients for all individual substances that impact the same toxicological endpoint. The analysis conducted for the proposed Golden Hill CPU and associated discretionary actions considered inhalation diesel particulate matter. When an individual hazard quotient is less than or equal to one, no adverse chronic non-carcinogenic health effects are expected from that substance. Similarly, if the hazard index is greater than one, chronic non-carcinogenic effects resulting from exposure to the substances emitted may be possible.

An assessment of the potential chronic risk due to DPM was made at the same receivers throughout the Golden Hill CPU area as discussed above for the carcinogenic risk. The results of the analysis indicate that the worst-case chronic health hazard index due to DPM from the freeways would be approximately 0.1 or less in 2035. The 2035 chronic health hazard index would be less than one at all locations within the Golden Hill CPU area. Therefore, this represents a less than significant chronic health impact.

Based on the preceding analysis the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact related to exposure of sensitive receptors to carbon monoxide hot spots and toxic air emissions.

Issue 4 Odors

Would the project create objectionable odors affecting a substantial number of people?

A potential odor impact can occur from two different situations: 1) the proposed Golden Hill CPU and discretionary actions would introduce receptors in a location where they would be affected by an existing or future planned odor source or 2) proposed uses within the Golden Hill CPU area would generate odors that could adversely affect a substantial number of persons.

The proposed Golden Hill CPU and associated discretionary actions would allow for development of single-family residential, multi-family residential, commercial, institutional, hotel, and park and open space land uses within the Golden Hill CPU area. While specific future land uses within the Golden Hill CPU are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation. The proposed Golden Hill CPU applies land uses based on the developed nature of the Golden Hill CPU area that includes residential uses in close proximity to commercial areas. A typical use in the Golden Hill CPU area that would generate odors would be restaurants. Restaurants can create odors from cooking activities, but would not generally be considered adverse. Odors associated with restaurants or other commercial uses would be similar to existing residential and commercial/food service uses throughout the Golden Hill CPU area. Odor generation is generally confined to the immediate vicinity of the source. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would not create operation-related objectionable odors affecting a substantial number of people within the City.

Cumulative Impacts

Issue 1 Air Quality Plans

For purposes of Issue 1, the cumulative study area would be considered the SDAB. Since the analysis provided under Issue 1 is a discussion of consistency with the air quality plan for the SDAB (i.e. the RAQS), the analysis provided a cumulative analysis by nature since it considers consistency of the project with a regional air quality plan that relies on the land use plans of jurisdictions within the basin. As discussed above, the proposed Golden Hill CPU and associated discretionary actions would generate less air emissions than the air emissions associated with build-out of the adopted Community Plan. Thus, the proposed Golden Hill CPU and associated discretionary actions would result in emissions less than what were anticipated when the RAQS were developed and the proposed Golden Hill CPU and associated discretionary actions would not conflict with implementation of the air quality plan. Thus, cumulative impacts related to conflicts with air quality plans would be less than significant.

Issue 2 Air Quality Standards

Construction

As shown in Table 7.4-2, the hypothetical worst case individual projects analyzed for purposes of a program-level construction emission analysis would not result in air emissions that exceed applicable thresholds. However, if several of these worst case hypothetical projects were to occur simultaneously, there is the potential to exceed significance thresholds. However, in order for exceedance of construction emissions thresholds to occur, more than one large scale project would have to be occurring within close proximity to one another with overlapping construction schedules. While unlikely to occur based on the fact that the Golden Hill CPU area is largely built out, future environmental review for these larger projects would allow for a site-specific analysis of construction-level air quality emissions to ensure projects are appropriately phased and timed to avoid such cumulative construction emissions. Thus, with implementation of the existing regulatory framework, cumulative construction emissions would be less than significant.

Operation

Regarding operational emissions, for purposes of this program-level analysis, consistency with the RAQS was considered the applicable threshold since the City's project-specific air quality impact screening levels shown in Table 7.4-1 would not be applicable to a communitywide plan update. As discussed, build-out of the Golden Hill CPU area would result in emissions below what was used in the assumptions used to develop the RAQS; thus, overall build-out of the Golden Hill CPU area would not result in operational emission impacts. Since the RAQS are established for the SDAB, which is the cumulative study area for air quality emissions, build-out of the land uses within the Golden Hill CPU area would not have the potential to result in a significant cumulative impact. Thus, cumulative operational emissions associated with build-out of the proposed Golden Hill CPU and associated discretionary actions would be less than significant.

Issue 3 Sensitive Receptors

CO Hot Spots

The CO hot spot analysis evaluated three intersections in the Golden Hill CPU area. The hot spot analysis indicated that the increases of CO due to the implementation of the CPU would be below the federal and state 1-hour and 8-hour standards. Since CO hot spots are a localized phenomenon, development within other community plans would not contribute to a cumulative CO hot spot impact.

Toxic Air Emissions

As discussed under Issue 2 above, the San Diego APCD would require an emissions inventory and health risk assessment in accordance with Assembly Bill 2588 prior to issuance of any permits to construct or operate a stationary emission source. These requirements would extend to land uses within the Golden Hill CPU area in addition to land uses within the SDAB as a whole. Thus, existing laws are in place that require evaluation and reduction of risks for individual projects developed in accordance with applicable land use plans. Site-specific evaluation of health risks associated with stationary sources cannot be conducted at this level of review, as the project does not include specific development proposals. Nevertheless, existing regulations would ensure that cumulative impacts associated with stationary sources of toxic air emissions would be less than significant as build-out of the plan occurs.

As discussed above under Issue 3, the carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than ten in a million within the Golden Hill CPU area and the non-carcinogenic risks from PM_{10} are measured to have a maximum chronic hazard index below the significance threshold of one. Development of cumulative projects within the SDAB would not exacerbate health effects since the evaluation is location-specific considering exposure to contaminants at a specific location. Therefore, the cumulative carcinogenic and non-carcinogenic toxic air emissions from exposure of residents to diesel particulate matter emissions would be less than significant.

Issue 4 Odors

For purposes of odor impacts, build-out of the three Community Plans including North Park, Golden Hill, and Uptown is considered within the cumulative analysis. Implementation of the CPUs would not result in a significant cumulative odor impact, because the CPUs and associated discretionary actions would result in single-family residential, multi-family residential, commercial, and park and open space land uses. These uses are not associated with generation of substantial odors. Additionally, odors are typically confined to the immediate area surrounding its source and thus, individual odor sources would not combine to produce a cumulative impact. Thus, objectionable odors affecting a substantial number of people within the City would not result, and cumulative odor impacts would be less than significant.

7.4.4 Significance of Impacts

Future operational emissions from the build-out of the proposed Golden Hill CPU would be less than anticipated for future operational emissions under the adopted Community Plans. Thus, emissions associated with the proposed Golden Hill CPU are already accounted for in the RAQS, and adoption of the proposed Golden Hill CPU would not conflict with the RAQS. Thus regarding Issue 1, impacts related to conflicts with applicable air quality plans would be less than significant.

Regarding construction emissions under Issue 2, based on the hypothetical worst case construction emission analysis discussed previously, air emissions associated with build-out of individual projects under the proposed Golden Hill CPU and associated discretionary actions would be less than significant. Additionally, based on the types and scale of projects that are ministerial, air emissions associated with ministerial projects would not be of a size that would have the possibility of exceeding project-level thresholds for air quality. Thus, construction emissions would be less than significant.

Regarding operational emissions under Issue 2, build-out of the CPU area would exceed the City's project-level thresholds for the proposed Golden Hill CPU; however, the Golden Hill CPU would emit fewer pollutants than would occur under the adopted Community Plan. Therefore, the air emissions from build-out of the proposed Golden Hill CPU would not increase air pollutants in the region, would not further increase the frequency of existing violations of federal or state AAQS, or would not result in new exceedances. Therefore, operational air quality impacts associated with the adoption of the proposed Golden Hill CPU would be less than significant.

Regarding Issue 4, odor impacts would be less than significant as the proposed Golden Hill CPU and associated discretionary actions do not propose land uses associated with generation of adverse odors. No mitigation is required

Regarding impacts to sensitive receptors (Issue 3), implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in any CO hot spots. Additionally, carcinogenic risks associated with diesel-fueled vehicles operating on local freeways would be less than the applicable threshold, and non-carcinogenic risks from diesel particulate matter would be below the maximum chronic hazard index. Thus, air quality impacts to sensitive receptors would be less than significant and no mitigation is required.

7.5 Greenhouse Gas Emissions

A Greenhouse Gas Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates (CPUs) was prepared by RECON (September 18, 2015). A Supplemental Analysis to the Greenhouse Gas Analysis for Uptown, North Park, and Golden Hill Community Plan Updates was prepared by RECON on May 16, 2016. These reports address greenhouse gas emissions and impacts associated with the proposed Golden Hill CPU. The reports are included as Appendix E-1 and E-2, respectively, to this draft Program Environmental Impact Report (PEIR) and form the basis for the discussion in this section.

7.5.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

7.5.1.1 Methodology and Assumptions

Annual greenhouse gas (GHG) emissions due to the operation of build-out of the Community Plan area under the adopted and proposed plans were calculated using California Emissions Estimator Model (CalEEMod; CAPCOA 2013). The emissions sources include construction (off-road vehicles), mobile (on-road vehicles), area (fireplaces, consumer products [cleansers, aerosols, and solvents], landscape maintenance equipment, and architectural coatings), water and wastewater, and solid waste sources. Where project-specific data were not available, model inputs were based on information provided in the CalEEMod User's Guide (CAPCOA 2013).

GHG emissions are estimated in terms of metric tons of carbon dioxide equivalent (MT CO_2E). CO_2E emissions are the preferred way to assess combined GHG emissions because they give weight to the global-warming potential (GWP) of different gases. The GWP is the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of carbon dioxide (CO_2). As example, CO_2 has a GWP of 1, methane (CH_4) has a GWP of 21, and nitrous oxide (N_2O) has a GWP of 310, which means CH_4 and N_2O have 21 and 310 times greater global warming effect than CO_2, respectively.

a. Estimating Construction Emissions

At a program level, it would be speculative to estimate the schedule and construction requirements of individual projects that could occur in the Golden Hill CPU area. Thus, this analysis relies on the methodology used in the San Diego County Updated Greenhouse Gas Inventory (San Diego County 2013), which forecasts that between 2015 and 2035 construction emissions would comprise roughly 2.1 percent of total GHG emissions within the county. Therefore, construction emissions are

estimated at 2.1 percent of the total operational GHG emissions associated with build-out of the proposed CPU.

b. Estimating Vehicle Emissions

Vehicle emissions are calculated based on the vehicle type, trip rate, and trip length for each land use. The vehicle emission factors and fleet mix used in CalEEMod are derived from California Air Resources Board's (CARB) Emission Factors 2011 model, which includes GHG reducing effects from the implementation of Pavley I (Clean Car Standards) and the Low Carbon Fuel Standard, and are thus considered in the calculation of emissions. Emission factors that include the effects of the Tire Pressure Program and the Low Emission Vehicles III regulations are not available. Therefore, to account for the effects of the Tire Pressure Program (0.6 percent) and the Low Emission Vehicles III (2.4 percent), a total 3 percent reduction was applied to the vehicle emissions calculated in CalEEMod (CARB 2011a).

The proposed Golden Hill CPU encourages increased development diversity by increasing commercial and multi-family land uses and decreasing the planned number of single-family residences. Locating different land use types near one another can decrease vehicle miles traveled (VMT), as trips between land use types are shorter and may be accommodated by alternative modes of transportation (CAPCOA 2010). This reduction was calculated using methodology from California Air Pollution Control Officers Association's (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010). By increasing density, especially within proximity of transit, people's travel distances are affected and greater options for the mode of travel are provided. This can result in a substantial reduction in VMT depending on the change in density compared to a typical urban residential density (CAPCOA 2010). By increasing the diversity of land use, a similar reduction in VMT can occur, because trips between land use types would be shorter and may be accommodated by non-auto modes of transport. By increasing transit accessibility (e.g., by locating a high-density project near transit), a shift in travel mode is facilitated along with reduced VMT. The effectiveness of these land-use strategies ranges from less than 1 percent up to a maximum 30 percent reduction in communitywide VMT and are not additive (CAPCOA 2010). For example, where high-density mixed use development is located within a 5- to 10-minute walk from a transit station with high-frequency transit or bus service and is combined with walkable neighborhood design, a total VMT reduction up to 24 percent can be achieved (CAPCOA 2010). The proposed Golden Hill CPU's focus on community walkability, diversity of land uses, and development of higher densities near job centers (downtown San Diego) was included in the CPU emission calculations. Based on a review of mapping, the average distance from areas with increased residential density to the nearest major job center, downtown San Diego, is approximately 1.7 miles for the Golden Hill planning area. The proposed Golden Hill CPU proposes an increase in multi-family residences. The VMT from residents of these new developments would be less due to the reduced trip lengths. Although this reduction was only counted for new development proposed under the proposed Golden Hill CPU, this would reduce overall mobile emissions by 3.1 percent in the Golden Hill CPU area.

c. Estimating Energy Use Emissions

CalEEMod estimates GHG emissions from energy use by multiplying average rates of residential and non-residential energy consumption by the quantities of residential units and non-residential square

footage to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider.

Building energy use is typically divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as plug-in appliances. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in energy use," can be further subdivided by specific end-use (refrigeration, cooking, office equipment, etc.).

Energy consumption values are based on the California Energy Commission (CEC) sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies, which identify energy use by building type and climate zone. Because these studies are based on older buildings, adjustments have been made in CalEEMod to account for changes to Title 24 Building Codes. CalEEMod is based on the 2008 Title 24 energy code (Part 6 of the Building Code).

As identified by the CEC, the Energy Code requires various improvements in the built environment that would achieve a 21.8 percent increase in electricity efficiency and a 16.8 percent increase in natural gas efficiency in non-residential buildings, a 36.4 percent increase in electricity efficiency and a 6.5 percent increase in natural gas efficiency in single-family uses, and a 23.3 percent increase in electricity efficiency and a 3.8 percent increase in natural gas efficiency in multi-family uses (CEC 2013).

The Golden Hill CPU area would be served by San Diego Gas & Electric (SDG&E). Therefore, SDG&E's specific energy intensity factors (i.e., the amount of CO2, CH4, and N2O per kilowatt-hour) are used in the calculations of GHG emissions. The state mandate for renewable energy is 33 percent by 2020 and 50 percent by 2035 (RECON 2015). However, the energy intensity factors included in CalEEMod by default only represent a 10.2 percent procurement of renewable energy (SDG&E 2011). SDG&E currently has procured 36.4 percent and would achieve 50 percent by 2035. To account for the continuing effects of Renewables Portfolio Standard (RPS) through 2020, the energy intensity factors included in CalEEMod were reduced based on the percentage of renewables reported by SDG&E. SDG&E energy intensity factors that include this reduction are shown in Table 7.5-1.

Table 7.5-1
San Diego Gas & Electric Intensity Factors

GHG	2009 (lbs/MWh)	2016 (lbs/MWh)	2020 (lbs/MWh)	2035 (lbs/MWh)
Carbon dioxide (CO2)	720.49	531.72	531.72	433.73
Methane (CH4)	0.029	0.021	0.021	0.017
Nitrous oxide (N2O)	0.006	0.004	0.004	0.004

SOURCE: SDG&E 2011.
lbs = pounds
MWh = megawatt hour

d. Estimating Area Source Emissions

Area sources include GHG emissions that would occur from the use of landscaping equipment. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. The landscaping equipment emission values were derived from the 2011 In-Use Off-Road Equipment Inventory Model (CARB 2011b).

e. Estimating Water and Wastewater Emissions

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH_4 and N_2O.

The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California* 2003 (as cited in CAPCOA 2013). Based on that report, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use (CAPCOA 2013).

Development would be subject to California Green Building Standards Code (CalGreen), which requires a 20 percent increase in indoor water use efficiency. Thus, in order to demonstrate compliance with CalGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations.

In addition to water reductions under CalGreen, the GHG emissions from the energy used to transport the water are affected by RPS. As discussed previously, to account for the effects of RPS through 2020 and 2030, the energy intensity factors included in CalEEMod were reduced by the values shown in Table 7.5-1.

f. Estimating Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. To calculate the GHG emissions generated by disposing of solid waste for the project, the total volume of solid waste was calculated using waste disposal rates identified by California Department of Resources Recycling and Recovery. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change (IPCC) method using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters. No solid waste reductions were modeled.

7.5.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to GHG emissions are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G. A significant impact could occur if implementation of a proposed CPU would:

1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

2) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs.

As stated in the Guidelines, these questions are "intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance" (Title 14, Division 6, Chapter 3 Guidelines for Implementation of the CEQA, Appendix G, VII Greenhouse Gas Emissions). The CEQA Guidelines require lead agencies to adopt GHG thresholds of significance. When adopting these thresholds, the Guidelines allow lead agencies to develop their own significance threshold and/or to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence.

Section 15064.4 of the CEQA Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

(a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

(1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or

(2) Rely on a qualitative analysis or performance-based standards.

While calculation of a project's contribution to greenhouse gas emissions is required, the CEQA Guidelines do not establish a standard by which to judge a significant effect or a means to establish such a standard. In order to determine significance of the impacts associated with implementation of the proposed Golden Hill CPU and associated discretionary actions, an inventory was developed based on the land use designations associated with the adopted Community Plan. Emissions from the proposed Golden Hill CPU and associated discretionary actions were then compared to the existing GHG emissions inventory and the GHG emissions inventory for the adopted Community Plan. If emissions from build-out of the Golden Hill CPU and associated discretionary actions are less than those that would be generated by build-out of the adopted Community Plan, impacts related to GHG emissions would be less than significant provided the proposed Golden Hill CPU and associated discretionary actions implement the land use-related strategies identified in the Climate Action Plan (CAP). If emissions from build-out of the proposed Golden Hill CPU are greater than those of the adopted Community Plan, impacts related to GHG emissions could still be less than significant if the increase in GHG emissions is a direct result of implementing CAP strategies and the General Plan's City of Villages Strategy.

As discussed in Section 5.5, Regulatory Setting of this PEIR, implementation of the City's CAP would result in Citywide GHG reductions consistent with its proportionate share of Statewide GHG emissions targets. The CAP assumes future population and economic growth based on the community plans that were in effect at the time the CAP was being developed. Therefore, community plan updates that would result in a reduction in GHG at build-out compared to GHG emissions at build-out under the adopted Community Plan would result in further GHG reductions. However, the CAP is a Citywide program and the General Plan City of Villages Strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to the regional transit system. Concentrating new growth in an area can result in greater GHG emissions than allowing the less intensive land uses to remain. Thus, consistency with the City of Villages Strategy can result in specific areas having an increase in GHG emissions, while Citywide a decrease of GHG emissions may occur. To address this phenomenon, this section takes a two-tiered approach in discussing GHG emissions: 1) a quantitative analysis of the existing conditions, build-out of the adopted Community Plan, and build-out of the proposed Golden Hill CPU and associated discretionary actions; and 2) a discussion of whether or not the proposed Golden Hill CPU and associated discretionary actions are consistent with the CAP.

7.5.3 Impact Analysis

7.5.3.1 Issue 1 Greenhouse Gas Emissions

Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As compared to the existing land uses, the proposed Golden Hill CPU would reduce industrial, institutional, recreational, and single-family residential land uses while increasing the development of commercial uses and multi-family dwelling units. This change represents an increase in land use types and density in the Golden Hill CPU area. Table 7.5-2 summarizes the land use distribution for existing conditions, the adopted Community Plan, and the proposed Golden Hill CPU.

Table 7.5-2 Land Use Distribution			
Land Use	Existing Land Use	Adopted Community Plan	Proposed Community Plan
Residential(dwelling units)			
Single-Family	3,100	2,070	2,095
Multi-Family[1]	4,160	7,100	7,120
SUBTOTAL[2]	7,260	9,170	9,215
Non-Residential (square feet)			
Commercial	268,810	431,160	393,960
Industrial	112,750	0	0
Institutional	264,130	213,040	213,040
Hotels	0	0	0
Recreation	2,250	0	0
SUBTOTAL[2]	**647,940**	**644,200**	**607,000**

[1]All dwelling units that are not single-family were counted as multi-family. This includes dwelling units on other land uses such as commercial and institutional.
[2]Total area may not match the sum of listed areas due to rounding.

Based on the methodology summarized above, GHG emissions were calculated for the existing (on the ground) land uses, the land uses at build-out of the adopted Community Plan (in 2035), and the land uses at build-out of the proposed Golden Hill CPU (in 2035). Table 7.5-3 summarizes the GHG emissions under each scenario.

Table 7.5-3 GHG Emissions for the Golden Hill Community Plan Area (MT CO_2E per Year)			
Emission Source	Existing	Adopted Community Plan	Proposed CPU
Vehicles	83,063	73,629	73,202
Energy Use	19,365	16,743	16,737
Area Sources	5,268	6,653	6,686
Solid Waste Disposal	3,407	3,348	3,348
Water Use	3,430	2,974	2,975
Construction	--	2,170	2,162
TOTAL	114,533	105,518	105,110

As shown in the above table, implementation of the proposed Golden Hill CPU would result in a decrease in GHG emissions of 9,423 MT CO_2E over the existing condition. For the purposes of determining significance, GHG emissions attributable to the proposed Golden Hill CPU at full build-out were compared to adopted Community Plan GHG emissions. As illustrated in Table 7.5-3, the total GHG emissions attributable to the adopted Community Plan equals 105,518 MT CO_2E per year. Total GHG emissions attributable to the proposed Golden Hill CPU equals 105,110 MT CO_2E per year. As such, the proposed Golden Hill CPU would result in a reduction of 408 MT CO_2E per year when compared to the adopted Community Plan. GHG emissions would be less than those that would

occur with build-out of land uses under the existing Community Plan that was the basis for preparation of the CAP's GHG Inventory.

As discussed in Section 7.5.2 above, impacts related to GHG emissions would be less than significant provided the proposed Golden Hill CPU and associated discretionary actions implement the land use-related strategies identified in the CAP. As further discussed below in Section 7.5.3.2, the proposed Golden Hill CPU and associated discretionary actions would be consistent with the City's CAP and would implement the General Plan's City of Villages Strategy. Thus, since the Golden Hill CPU would result in a reduction of GHG emissions when compared with land uses currently approved and would be consistent with the CAP, GHG emission impacts would be less than significant.

7.5.3.2 Issue 2 Conflicts with Plans or Policies

Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The regulatory plans and policies discussed in Section 5.5 aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are, thus, largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments.

For the energy sector, the reduction strategies aim to: reduce energy demand, impose emission caps on energy providers, establish minimum building energy and green building standards, transition to renewable non-fossil fuels, incentivize homeowners and builders, fully recover landfill gas for energy, and expand research and development.

a. Consistency with State Plans

Executive Order S-3-05 establishes GHG emission reduction targets for the state, and Assembly Bill 32 launched the Climate Change Scoping Plan that outlines the reduction measures needed to reach these targets. Out of the Recommended Actions contained in CARB's Scoping Plan, the actions that are most applicable to the proposed Golden Hill CPU would be Actions E-1 and GB-1. CARB Scoping Plan Action E-1, together with Action GB-1 (Green Building), aim to reduce electricity demand by increasing the efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The new construction associated with the proposed Golden Hill CPU and associated discretionary actions would be required to include all mandatory green building measures under the CalGreen Code. Therefore, the proposed Golden Hill CPU would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

b. Consistency with Regional Plans

San Diego Association of Governments' San Diego Forward: The Regional Plan

The proposed Golden Hill CPU would be consistent with the goals of the Regional Plan to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The Golden Hill CPU proposes to reinforce the 30th Street Transit Corridor and establish a pedestrian-oriented, urban, and mixed-use Neighborhood Village (the 25th Street Neighborhood Village) that would reduce reliance on the automobile, and promote walking and use of alternative transportation. Policies contained within the proposed Golden Hill CPU Land Use and Mobility elements would serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. These measures would be consistent with the Regional Plan's Sustainable Communities Strategy. Thus, no significant adverse environmental effects would result from the adoption of the proposed Golden Hill CPU in terms of consistency or conflicts with the Regional Plan.

c. Consistency with Local Plans

City of San Diego General Plan

Compared to the existing land uses, the proposed Golden Hill CPU envisions reducing industrial, institutional, recreational, and single-family residential land uses and increasing commercial space and multi-family dwelling units. This would increase the diversity of land uses within the CPU area by encouraging "village-like" development consistent with the San Diego General Plan. The proposed Golden Hill CPU also supports General Plan concepts including increased walkability, a higher level of alternative transportation use, and sustainable development and green building practices.

Policies within the Land Use Element of the proposed Golden Hill CPU promote mixed-use development along major transportation corridors, specifically calling out 25th Street and 30th Street for a diversity of uses. Policies within the Mobility Element of the Golden Hill CPU promote multi-modal development, enhanced pedestrian and bicycle facilities, and active storefronts to increase pedestrian engagement. Policies within the Conservation Element of the proposed Golden Hill CPU promote adaptive reuse or retrofits of existing buildings, use of solar panels on existing buildings and new development, and the preservation of street trees. All of these policies correspond with policies from the General Plan. Thus, the proposed Golden Hill CPU would be consistent with the San Diego General Plan.

City of San Diego Climate Action Plan

New land use designations and policies within the proposed Golden Hill CPU have been designed to reflect and implement the CAP and the GHG reduction recommendations of the General Plan. Specifically, the proposed Golden Hill CPU includes updated Land Use, Mobility, and Conservation elements that include multiple policies aimed at reducing GHG emissions from target emission sources and adapting to climate change. The proposed policies refine existing General Plan policies with site-specific recommendations applicable to the individual community. In several cases, these policies are also consistent with state key GHG reduction plans, regulations, and recommended mitigation measures.

The CAP establishes five primary strategies for achieving the goals of the plan. Strategy 1 (Energy & Water Efficient Buildings) includes goals, actions, and targets with the aim of reducing building energy consumption. Energy reduction can be achieved through the continued use or adaptive reuse of the existing building stock along with any needed energy efficiency upgrades. The proposed Golden Hill CPU includes narrative and policies in the Conservation Element that for creation of sustainable landscapes that are re-generative and increase energy efficiency, and retrofitting public right-of-way lighting with energy efficient lighting.

Another goal in Strategy 1 is to reduce daily per capita water consumption. The proposed Golden Hill CPU includes discussion and policies to address water usage through conservation, including design opportunities for both public facilities and private development. In the Conservation and Urban Design Elements, policies are included to encourage the retrofit of buildings to capture and utilize rain water for landscaping or through greywater reuse systems, utilize low water plant species, and utilize sustainable and green building practices, which would in turn reduce water usage at those properties. Another policy that speaks directly to publically-initiated development projects is to improve both energy and water conservation in the operation and design of existing and new public facilities. water recycling opportunities throughout the community.

Regarding Strategy 2 (Clean & Renewable Energy), the proposed Golden Hill CPU includes discussion and an overarching goal in the Conservation Element to encourage development to implement the sustainable building practices to reduce dependence on non-renewables. The proposed Golden Hill CPU encourages the use solar and other renewable energy systems to supplement r replace traditional building energy systems. Within the Urban Design Element, a policy is included to encourage the integration of practical energy generation such as solar power or other technologies into the overall building design for new development.

Strategy 3 (Bicycling, Walking, Transit & Land Use) has a number of goals that relate to land use and planning. The proposed Golden Hill CPU is consistent with the General Plan's Mobility Element and the City of Villages Strategy and is thus consistent with Action 3.1 of the CAP. Consistent with Action 3.2 of the CAP, the proposed Golden Hill CPU would promote pedestrian improvements in Transit Priority Areas to increase commuter walking opportunities. Consistent with Action 3.6 of the CAP, the Golden Hill CPU would implement transit-oriented development, particularly within and around the 25th Street Neighborhood Village and the 30th Street Transit Corridor.

The primary goal of Strategy 4 (Zero Waste – Gas & Waste Management) is to divert solid waste and capture landfill methane gas emissions. This strategy is Citywide in nature; however, the proposed Golden Hill CPU furthers this strategy by including discussion and policies in the Urban Design Element that support the incorporation of recycling bins into the streetscapes, and encourages the re-use or recycling of building materials for both public and private new development.

Strategy 5 (Climate Resiliency) calls for further analysis of the resiliency issues that face the various areas of the City. Resiliency is addressed throughout the proposed Golden Hill CPU in the Land Use, Mobility, Urban Design, and Conservation Elements with policies supporting and encouraging the increase in the tree canopy within the community. The Urban Design Element provides many policies related to the placement, species, and trees in the rights-of-way, public properties, and private development.

As mentioned in Section 5.5, the CAP's Monitoring and Reporting Program Measure 1.4 calls for City Staff to annually evaluate City policies, plans (including the CAP), and codes as needed to ensure the CAP reduction targets are met. Through monitoring the effectiveness of CAP actions at reducing GHG emissions, the City would be able to make adjustments to the CAP, which could include amending land use plans to reflect more aggressive strategies for GHG reduction. Therefore, the proposed Golden Hill CPU would be consistent with and would implement the CAP.

Cumulative Impacts

The impact analysis discussed under Issue 1 above is a cumulative analysis by its nature because GHG emissions are a cumulative issue caused by the global greenhouse gas emissions and not an individual project. Cumulatively, there exists a significant impact related to greenhouse gas emissions at the global level. However, as discussed under Issue 1 above, the project's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable. As discussed under Issue 2, City policies, plans, and codes will be evaluated as needed to ensure that CAP GHG emissions reduction targets are met. If implementation of the Golden Hill CPU cumulatively with other CPUs would be inconsistent with the CAP or other plans/policies for the reduction of GHG, the City could amend land use plans to reflect more aggressive strategies for GHG reduction. Thus, cumulative impacts related to conflicts with applicable GHG policies or plans would be less than significant.

7.5.4 Significance of Impacts

Potential impacts related to GHG emissions from implementation of the proposed Golden Hill CPU and associated discretionary actions would be less than significant as GHG emissions would be less than those that would occur with build-out of land uses under the existing Community Plan that was the basis for preparation of the CAP's GHG Inventory. Additionally, the proposed Golden Hill CPU policies would further implement policies in the CAP and would be consistent with the CAP.

The proposed Golden Hill CPU would implement the General Plan's City of Villages Strategy and include policies for the promotion of walkability and bicycle use, polices promoting transit-supportive development, and thus, is consistent with the CAP and the General Plan. Impacts related to conflicts with applicable plans and policies addressing GHG emissions would be less than significant and no mitigation is required.

7.5.5 Mitigation Measures

All impacts related to greenhouse gas emissions would be less than significant. Thus, no mitigation is required.

7.6 Noise

This section addresses the potential noise impacts that would result from implementation of the proposed Golden Hill Community Plan Update (CPU) and associated discretionary actions. It also discusses the regulations applicable to subsequent projects contemplated by the Golden Hill CPU. This section is based on the Noise Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates (Noise Report) prepared by RECON (2016) for the project (Appendix F).

7.6.1 Existing Conditions

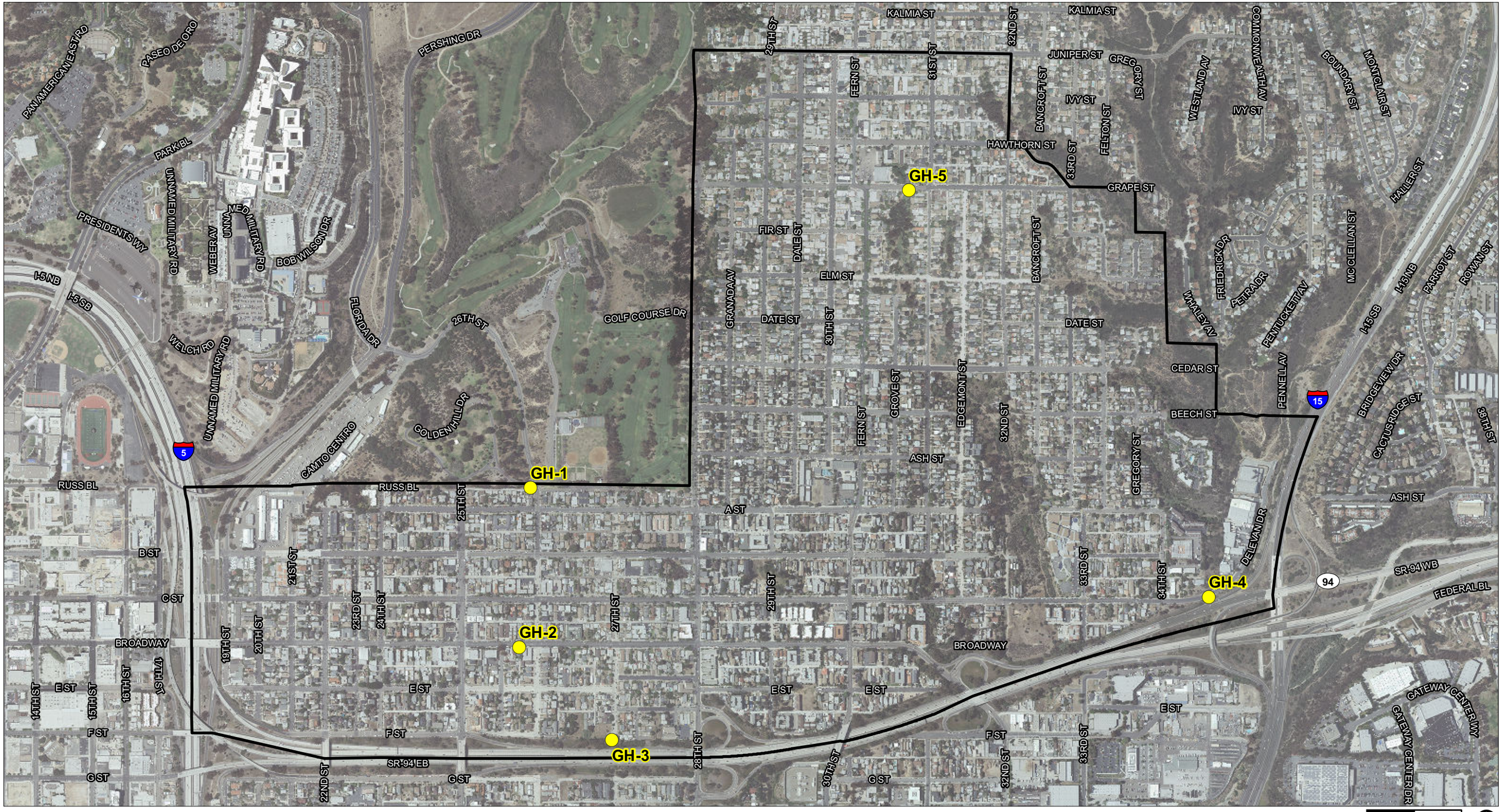
The existing regional environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. The specific noise conditions for the Golden Hill CPU area are discussed in the following sections.

Noise sensitive receptors are land uses for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common noise sensitive uses include: residences, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child-care facilities, and certain types of passive recreational parks and open space. Existing noise sources in the Golden Hill CPU area are transportation and stationary sources. Transportation noise sources include vehicle traffic, and overflight of aircraft approaching and departing the San Diego International Airport. Stationary noise sources include industrial and commercial operations. Noise from these sources conflicts with existing noise sensitive receptors throughout the community

7.6.1.1 Noise Measurements

As part of the noise assessment, ambient noise levels were measured in the planning area to provide a characterization of the variability of noise throughout the Golden Hill CPU area and to assist in determining constraints and opportunities for future development. Ambient noise levels were measured to characterize the variability of noise and to assist in determining constraints and opportunities to avoid noise conflicts. Five 15-minute, daytime noise level measurements were conducted throughout the study area. Noise measurements were taken with two Larson-Davis LxT Type 1 Integrating Sound Level Meters, serial numbers 3827 and 3827. Each measurement location is shown in Figure 7.6-1. A summary of the measurements is provided in Table 7.6-1.

Image source: SanGIS (flown May 2012)



Golden Hill Community Plan Boundary

Noise Measurements

FIGURE 7.6-1

Noise Measurement Locations – Golden Hill

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Table 7.6-1
Noise Measurements – Golden Hill

ID[1]	Location	Date	Time	L_{eq}
GH-1	26th Street	3/04/2015	10:57 A.M. – 11:12 A.M.	64.0
GH-2	Broadway	3/04/2015	11:30 A.M. – 11:45 A.M.	60.0
GH-3	SR-94	3/04/2015	12:02 P.M. – 12:17 P.M.	74.5
GH-4	SR-94/SR-15	3/04/2015	12:42 P.M. – 12:57 P.M.	73.2
GH-5	Grape Street	3/04/2015	1:20 P.M. – 1:35 P.M.	63.4

[1]Measurement locations are shown in Figure 7.6-1 and are represented by the ID.

Based on the measurement data shown in Table 7.6-1, daytime noise levels in the Golden Hill CPU area are typical of an urban environment. Each measurement location and noise source observed during the measurements is discussed below.

Measurement GH-1 was taken adjacent to 26th Street. The main source of noise at the measurement location was vehicle traffic on 26th Street, Russ Boulevard, and Gold Course Drive. The measured speed on this portion of 26th Street was 25 mph. The average measured noise level was 64.0 A-weighted decibels average sound level [dB(A) L_{eq}].

Measurement GH-2 was taken adjacent to Broadway. The main sources of noise at the measurement location were vehicle traffic on Broadway and 26th Street, and aircraft approaching the San Diego International Airport. The measured speed on this portion of Broadway was 25 miles per hour (mph). The average measured noise level was 60.0 dB(A) L_{eq}.

Measurement GH-3 was taken at the southern end of 27th Street overlooking State Route 94 (SR-94). The main source of noise at the measurement location was vehicle traffic on SR-94. The average measured noise level was 74.5 dB(A) L_{eq}.

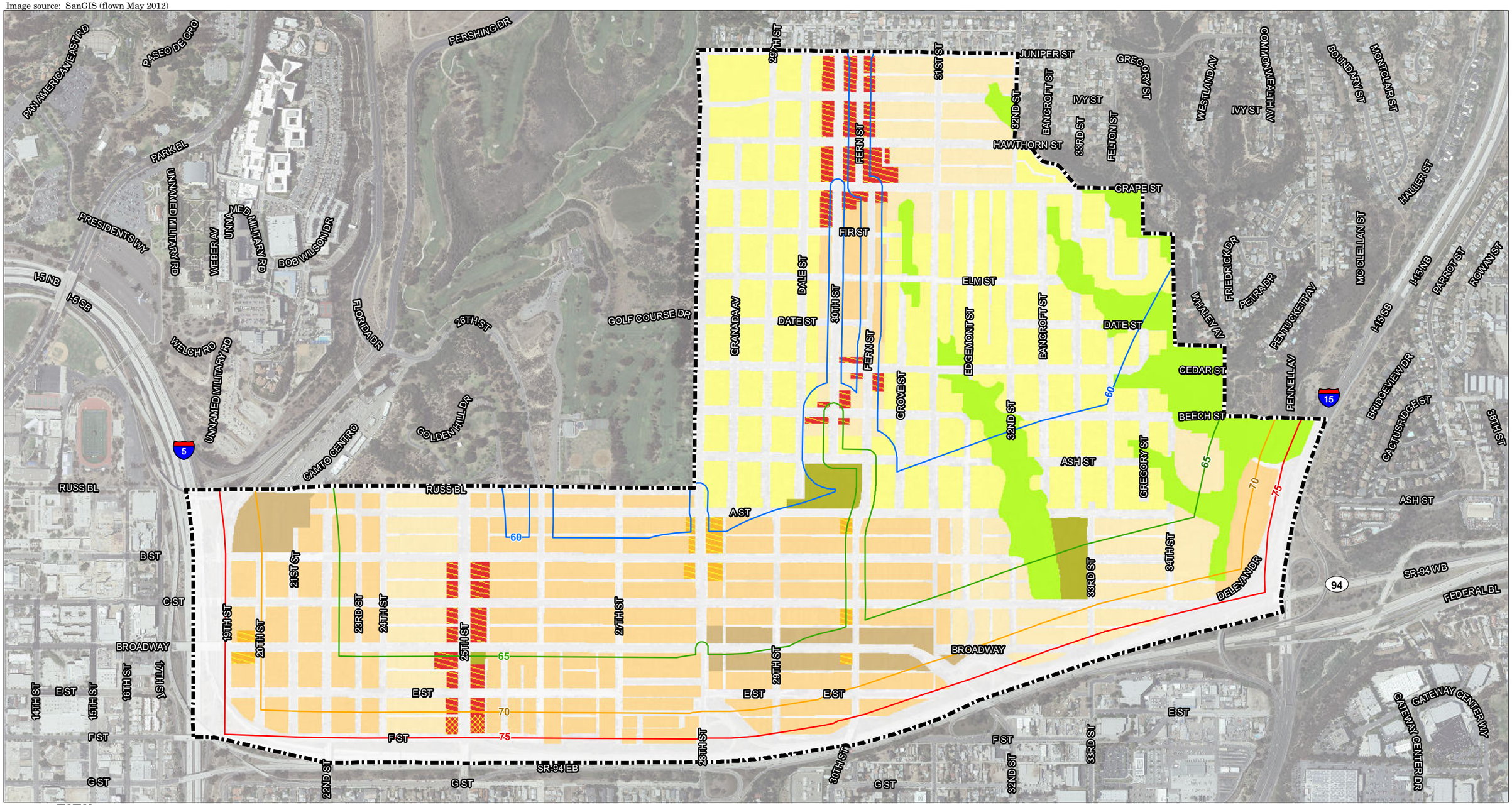
Measurement GH-4 was taken adjacent to C Street overlooking SR-94 and SR-15. The main sources of noise at the measurement location were vehicle traffic on SR-94 and SR-15, and aircraft approaching the San Diego International Airport. The average measured noise level was 73.2 dB(A) L_{eq}.

Measurement GH-5 was taken adjacent to Grape Street. The main sources of noise at the measurement location were vehicle traffic on Grape Street, and aircraft approaching the San Diego International Airport. The measured speed on this portion of 26th Street was 25 mph. The average measured noise level was 63.4 dB(A) L_{eq}.

7.6.1.2 Existing Vehicle Traffic Noise

The dominant noise source for the community plan area is vehicle traffic on roadways. Vehicle traffic noise is directly related to the traffic volume, speed, and mix of vehicles. Vehicles traveling on Interstate 5 (I-5) and SR-15 freeways are the dominant noise sources affecting the Golden Hill CPU area. The streets where the greatest noise level is generated in area are 25th Street, 28th Street, 30th Street, and Broadway. Figure 7.6-2 shows the existing vehicle traffic noise contours for the Golden Hill CPU area.

Image source: SanGIS (flown May 2012)



Golden Hill Community Plan Boundary

Existing Noise Contours

- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL

Proposed Land Use (Draft)

Residential

- Residential - Low : 5-9 Du/Ac
- Residential - Low Medium : 10-15 Du/Ac
- Residential - Medium : 16-29 Du/Ac
- Residential - Medium High : 30-44 Du/Ac

Commercial, Employment, Retail, and Services

- Community Commercial - Residential Permitted : 0-29 Du/Ac
- Community Commercial - Residential Permitted : 0-44 Du/Ac
- Neighborhood Commercial - Residential Permitted : 0-29 Du/Ac

Park, Open Space, and Recreation

- Open Space

Institutional, and Public/Semi-Public Facilities

- Institutional

0 Feet 800

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FIGURE 7.6-2

Existing Traffic Noise Contours – Golden Hill

As shown, existing noise levels in the community exceed 60 dB(A) CNEL. The noise contours represent the predicted noise level for each roadway without the attenuating effects of noise barriers, structures, topography, or dense vegetation. The noise contours should not be considered site-specific but rather guides to determine when detailed acoustic analysis should be undertaken.

The freeways are the dominant noise sources affecting the Golden Hill CPU area and encompass the noise contours from streets in the Golden Hill CPU area.

7.6.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed Golden Hill CPU. A significant impact related to noise would occur if the proposed CPU and associated discretionary actions would:

1) Result in or create a significant increase in the existing ambient noise levels;

2) Result in an exposure of people to current or future transportation noise levels which exceed guidelines established in the Noise Element of the General Plan;

3) Result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP);

4) Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code; or

5) Result in the exposure of people to significant temporary construction noise.

7.6.2.1 Noise

Thresholds used to determine the significance of noise impacts are based on standards in the City General Plan Noise Element and the Noise Abatement and Control Ordinance (Section 59.5.0101 et seq. of Municipal Code) as described in the Regulatory Framework chapter, sections 5.6.2.1 and 5.6.2.2, respectively.

7.6.2.2. Vibration

While, the City has not established specific groundborne noise and vibration standards, publications of the Federal Transit Administration (FTA) and California Department of Transportation (Caltrans) provide guidance for the analysis of environmental impacts due to groundborne noise and vibration relating to transportation and construction projects. Based on Caltrans recommended standards, a significant vibration impact would occur where residences would be exposed to an exceedance of 0.2 inch per second peak particle velocity.

7.6.3 Methodology and Assumptions

7.6.3.1 Vehicle Traffic Noise

Existing freeway volumes and traffic mixes were obtained from Caltrans and San Diego Association of Governments (SANDAG) traffic and truck counts for the SR-15, I-805, and I-8. These traffic mixes, which are detailed in the Noise Analysis (see Appendix F), were used for modeling existing and future freeway noise.

For streets in the Golden Hill CPU area, a traffic mix of 96 percent cars, three percent medium trucks, and one percent heavy trucks was modeled. This is consistent with traffic counts taken during the existing noise measurements, and the same as Caltrans truck counts for most area freeways.

The Federal Highway Administration (FHWA) Traffic Noise Model was used to calculate distances to noise contours for freeways and streets. The FHWA model takes into account traffic mix, speed, and volume; roadway gradient; relative distances between sources, barriers, and sensitive receptors; and shielding provided by intervening terrain or structures. The analysis of the noise environment considered that the topography was flat with no intervening terrain between sensitive land uses and roadways. Because no obstructions were assumed in the noise modeling, predicted noise levels used in the analysis are higher than would actually occur. In the actual environment, buildings and other obstructions along the roadways would shield distant receivers from the traffic noise. For example, SR-94 is at a lower elevation than the streets and buildings in the Golden Hill CPU area and it is likely that the slopes and retaining walls adjacent to the freeway reduce the actual noise levels.

7.6.3.2 Stationary Noise

Stationary sources of noise include activities associated with a given land use. Plan implementation would create many instances of residential land uses located adjacent to or sharing a boundary with commercial and mixed-use land uses as well as recreational and institutional uses. Proposed land uses would introduce on-site stationary noise sources, including rooftop HVAC equipment; mechanical equipment; emergency electrical generators; parking lot activities; loading dock operations; and parks, schools, and recreation activities. Stationary noise is considered a “point source” and attenuates over distance at a rate of 6 dBA for each doubling of distance.

7.6.4 Impact Analysis

Issue 1 Ambient Noise

Would the proposed project result in or create a significant increase in the existing ambient noise level?

As discussed in Section 7.6.1.1, Noise Measurements, existing noise levels were measured in the planning area to identify ambient noise conditions (refer to Table 7.6-1).

The freeways generating the greatest noise levels affecting the Golden Hill CPU area are I-5, SR-15, and SR-94. The streets generating the greatest noise level within the Golden Hill CPU are 25th Street, 28th Street, 30th Street, and Broadway. Increases in traffic noise gradually degrade the ambient noise environment, especially with respect to sensitive receptors. Vehicular traffic on streets in the Golden Hill CPU area would increase due to build-out of the proposed Golden Hill CPU. Table 7.6-2 summarizes the existing and build-out traffic noise levels along various roadway segments in the Golden Hill CPU area. The increase of vehicle traffic on freeways would occur regardless of the proposed Golden Hill CPU and associated discretionary actions due to regional growth. Roadway noise is measured in dB(A) CNEL at 50 feet from the roadway centerline.

Table 7.6-2
Increases in Ambient Noise – Golden Hill

Roadway	From	To	Existing Noise Level[1]	2035 Noise Level[1]	Change in dB(A)
25th Street	Russ Boulevard	C Street	54.2	62.3	8.1
	C Street	Broadway	63.1	63.8	0.7
	Broadway	F Street	64.2	65.8	1.6
26th Street	Russ Boulevard	B Street	63.0	62.5	-0.5
	B Street	C Street	56.7	60.5	3.8
28th Street	Russ Boulevard	C Street	61.8	64.4	2.6
	C Street	Broadway	64.1	65.2	1.1
	Broadway	SR-94	65.2	67.8	2.6
30th Street	Grape Street	Beech Street	60.8	63.3	2.5
	Beech Street	A Street	67.1	67.9	0.8
	A Street	Broadway	67.1	67.9	0.8
	Broadway	SR-94	61.2	64.7	3.5
31st Street	Juniper Street	Grape Street	57.0	60.1	3.1
B Street	19th Street	20th Street	62.2	63.1	0.9
	20th Street	25th Street	60.6	62.3	1.7
	25th Street	26th Street	61.6	63.7	2.1
	26th Street	28th Street	62.9	63.5	0.6
	28th Street	30th Street	59.3	62.5	3.2
Beech Street	28th Street	Fern Street	57.4	62.9	5.5
Broadway	19th Street	20th Street	61.0	61.2	0.2
	20th Street	25th Street	60.3	62.4	2.1
	25th Street	28th Street	59.6	60.8	1.2
	28th Street	30th Street	57.6	60.3	1.7
	30th Street	SR-94	65.4	63.6	-1.8
C Street	19th Street	20th Street	60.8	62.8	2.0
	20th Street	25th Street	60.9	61.5	0.6
	25th Street	28th Street	60.9	62.3	1.4
	28th Street	30th Street	59.2	61.1	1.9
	30th Street	34th Street	61.2	63.9	2.7
Cedar Street	Fern Street	Felton Street	59.4	60.3	0.9
Fern Street	Juniper Street	Grape Street	62.6	62.9	0.3
	Grape Street	A Street	62.5	65.2	2.7
Grape Street	30th Street	31st Street	57.6	62.9	5.3

Table 7.6-2
Increases in Ambient Noise – Golden Hill

Roadway	From	To	Existing Noise Level[1]	2035 Noise Level[1]	Change in dB(A)
Balboa Park					
Florida Drive	Morley Field Drive	Zoo Place	67.5	68.7.4	0.9
Golf Course Drive	26th Street	28th Street	58.7.5	60.2	1.7
Park Boulevard	Zoo Place	Space Theater Way	69.7	70.9	1.2
	Space Theater Way	Presidents Way	69.4	70.6	1.2
	Presidents Way	SR-163 NB On-Ramp	70.4	71.7	1.3
Pershing Drive	Redwood Street	Florida Drive	69.9	72.4	2.5
	Florida Drive	I-5 Ramps	74.8	75.7	0.9
	I-5 Ramps	B Street	63.3	65.0	1.7
Freeways					
I-5	SR-163	Pershing Drive	85.4	87.7	2.3
	Pershing Drive	SR-94	85.8	87.6	1.8
	SR-94	Imperial Avenue	84.7	86.5	1.8
SR-15	I-805	SR-94	83.1	84.0	0.9
SR-94	25th Street	28th Street	83.6	86.0	2.4
	28th Street	30th Street	83.8	86.5	2.7
	30th Street	SR-15	84.2	86.6	2.4

[1]Roadway noise is measured in dB(A) CNEL at 50 feet from the roadway centerline.
Bold = Increase in ambient noise levels would be potentially significant per the following criteria:

a) Where exterior noise levels currently exceed the compatibility guidelines, the increase in ambient noise would exceed 3 dB(A).
b) Where exterior noise levels are currently less than the compatibility guidelines and future noise levels would also be less than the compatibility guidelines, the increase in ambient noise would exceed 5 dB(A).
c) Where exterior noise levels that are currently at or very near the compatibility guidelines, the increase in ambient noise would exceed 5 dB(A) or would result in a future noise level that would be 3 dB(A) more than the compatibility guideline.

The following street segments in the Golden Hill CPU area currently generate noise levels lower than 65 dB(A) CNEL and would generate future noise levels lower than 65 dB(A) CNEL, but future noise levels would increase by more than 5 dB(A) over existing ambient noise levels:

- 25th Street from Russ Boulevard to C Street
- Beech Street from 28th Street to Fern Street
- Grape Street from 30th Street to 31st Street

a. Existing Noise Sensitive Land Uses

There are existing noise sensitive uses located adjacent to these streets segments and there could be additional future sensitive uses located adjacent to the street segments under the proposed Golden Hill CPU. The increase in ambient noise levels adjacent to these segments of 25th Street, Beech Street, and Grape Street would result in the exposure of existing sensitive receptors to a significant increase in ambient noise levels, and impacts would be significant. Possible noise-reduction measures would include retrofitting older residential structures with new window and

door components with higher Sound Transmission Class (STC) ratings, which is a measure of how well a building wall, windows, and door components attenuate exterior noise.

The Quieter Home Program administered by the San Diego County Regional Airport Authority is intended to attenuate interior noise levels of existing buildings from aircraft noise, the attenuation would also reduce interior noise levels from exterior motor vehicle noise. Some of the existing residences in the Golden Hill CPU area have already participated in this program and have undergone retrofits to reduce interior noise levels to 45 dB(A) CNEL. However, for existing uses that have not participated in or are not eligible for the Quieter Home Program, it cannot be determined at the program level whether the existing structures contain adequate attenuation to reduce interior noise to the 45 dB(A) CNEL standard, nor what measures would be required to retrofit these structures.

Additionally, existing noise sensitive land uses would be exposed to an increase in exterior noise levels. A possible measure addressing exterior noise levels at outdoor usable areas includes installation of noise barriers; however, there is no mechanism to require installation of noise barriers for existing noise sensitive land uses. At the program level, it cannot be determined whether existing structures contain adequate attenuation to reduce interior noise to the 45 dB(A) CNEL standard and exterior noise to the 65 dB(A) CNEL, nor what measures would be required to reduce noise to meet applicable standards.

Because the significant noise impacts are to existing homes in an already urbanized area, there is no feasible mitigation at the program-level. Thus, impacts to existing residential structures or other structures with sensitive land uses due to the increase in ambient noise levels associated with build-out of the proposed Golden Hill CPU and associated discretionary would remain significant and unavoidable.

Impact 7.6-1 The increase in ambient noise levels as a result of buildout of the Golden Hill CPU and associated discretionary actions would be 3 dB or more along the road segments listed below, and would result in the exposure of existing sensitive receptors to noise levels in excess of the compatibility levels established in the General Plan Noise Element, resulting in a significant impact:

- 25th Street from Russ Boulevard to C Street
- Beech Street from 28th Street to Fern Street
- Grape Street from 30th Street to 31st Street

b. Future Noise Sensitive Land Uses

An existing regulatory ~~mitigation~~ framework and review process exists for new development in areas exposed to high levels of ambient noise. Policies in the proposed Golden Hill CPU and General Plan related to decibel levels, procedures in the Municipal Code, and regulations (Title 24) would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. Site-specific noise analyses that demonstrate that the project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility guidelines of the City's General Plan would be required as part of the review process for

discretionary, to the extent practicable projects. With implementation of these regulations and proceduresthis framework, noise impacts to new discretionary projects would be less than significant. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable. Interior noise impacts for all projects including ministerial projects would be less than significant because applicants must demonstrate compliance with the current interior noise standards (45 dB(A) CNEL) through submission and approval of a Title 24 Compliance Report.

While the proposed Golden Hill CPU and associated discretionary actions would not generate future noise levels greater than 65 dB(A) CNEL, future noise levels would increase by more than 5 dB(A) over existing ambient noise levels on segments of 25th Street, Beech Street and Grape Street. While future discretionary projects have a framework in place that would ensure exterior noise levels are appropriately attenuated to meet the General Plan Compatibility Standards, there is no similar mechanism in place for ministerial projects, resulting in a significant impact.

Impact 7.6-2 Due to an increase in ambient noise levels by more than 5 dB(A) over existing ambient noise levels resulting from build-out of the Golden Hill CPU and associated discretionary actions, a significant impact would occur for future projects located along the roadway segments listed below that only require the approval of a ministerial permit:

- 25th Street from Russ Boulevard to C Street
- Beech Street from 28th Street to Fern Street
- Grape Street from 30th Street to 31st Street

For all other street segments in the Golden Hill CPU area not included in the above list, the increase in ambient noise would be less than significant.

Issue 2 Vehicular Noise

Would the proposed project cause exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?

A significant impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary actions would result in an exposure of people to current or future motor vehicle traffic noise levels that exceed standards established in the Noise Element of the General Plan. The General Plan noise and land use compatibility guidelines are presented in Table 5-3, Typical Sound Levels in the Environment and Industry. The proposed Golden Hill CPU proposes single-family residential, multi-family residential, commercial, institutional, visitor accommodations, and park and open space land uses, which are compatible with the following noise levels.

- Single-family residential is compatible up to 60 dB(A) CNEL and conditionally compatible up to 65 dB(A) CNEL.

- Multi-family residential and mixed uses are compatible up to 60 CNEL and conditionally compatible up to 70 CNEL. Additionally, as stated in Section B of the City's Noise Element, although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected by motor vehicle traffic noise with existing residential uses. Any future residential use exposed to noise levels up to 75 dB(A) CNEL must include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses.
- Sales, commercial services, and office uses are compatible up to 65 dB(A) CNEL and conditionally compatible up to 75 dB(A) CNEL.
- Institutional uses are compatible up to 60 dB(A) CNEL and conditionally compatible up to 65 dB(A) CNEL.
- Visitor accommodations (hotel) uses are compatible up to 60 dB(A) CNEL and conditionally compatible up to 75 dB(A) CNEL.
- Neighborhood parks are compatible up to 70 dB(A) CNEL and conditionally compatible up to 75 dB(A) CNEL.

While the General Plan Noise Element has a compatibility level of 60 dB(A) CNEL or less for residential uses, noise levels up to 65 dB(A) CNEL for single-family residential and up to 70 dB(A) CNEL for multi-family residential are considered conditionally compatible, since interior noise levels can be reduced to 45 dB(A) CNEL through simple means, such as closing/sealing windows and providing mechanical ventilation. Additionally, as stated in Section B of the General Plan Noise Element, although not generally considered compatible, the General Plan conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected by motor vehicle traffic noise with existing residential uses.

Any future residential use exposed to noise levels up to 75 dB(A) CNEL must include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses. Passive mitigation such as noise walls can usually reduce exterior noise levels to comply with General Plan Noise Element guidelines. The majority of proposed Golden Hill CPU residential land uses would be located within the conditionally compatible range. Multi-family residential uses located where exterior noise levels range from 65 to 70 dB(A) CNEL are considered conditionally compatible and can generally provide the required structural attenuation to reduce noise levels at interior locations. Multi-family and mixed-use residential uses that meet the requirements of Section B of the General Plan Noise Element would be conditionally compatible up to 75 dB(A) CNEL and would also be required to provide structural attenuation to reduce noise levels at interior locations.

Additionally, due to the provision of common exterior use areas, multi-family residential land uses can generally provide greater shielding to these areas, thus providing exterior use areas that comply with the General Plan Noise Element guidelines. Likewise, backyards of single-family residential uses can be shielded from roadway noise by the residential structure, and providing exterior use areas that are compatible with the General Plan Noise Element guidelines.

As shown in Figure 7.6-3, traffic noise levels at existing and proposed residential use areas closest to the freeways and heavily traveled roadways would exceed the General Plan Noise Element compatibility thresholds for residential land uses [65 dB(A) CNEL for single-family and conditionally up to 75 dB(A) CNEL for multi-family and mixed-use developments that meet the requirements of Section B of the Noise Element]. Noise levels greater than 75 dB(A) CNEL are considered incompatible for all land use types. Uses located adjacent to I-5, SR-15, and I-805 in the Golden Hill CPU area have the potential to be exposed to noise levels greater than 75 dB(A) CNEL. Additionally, as noted previously, elevations of SR-94 are lower than the surrounding structures and streets, noise levels would be less than those shown in Table 7.6-3 and Figure 7.6-3. This analysis represents a worst-case scenario. However, the proposed Golden Hill CPU and associated discretionary actions would not locate new sensitive land uses in areas that are exposed to 75 dB(A) CNEL or greater.

Table 7.6-3
Future Vehicle Traffic Contour Distances – Golden Hill

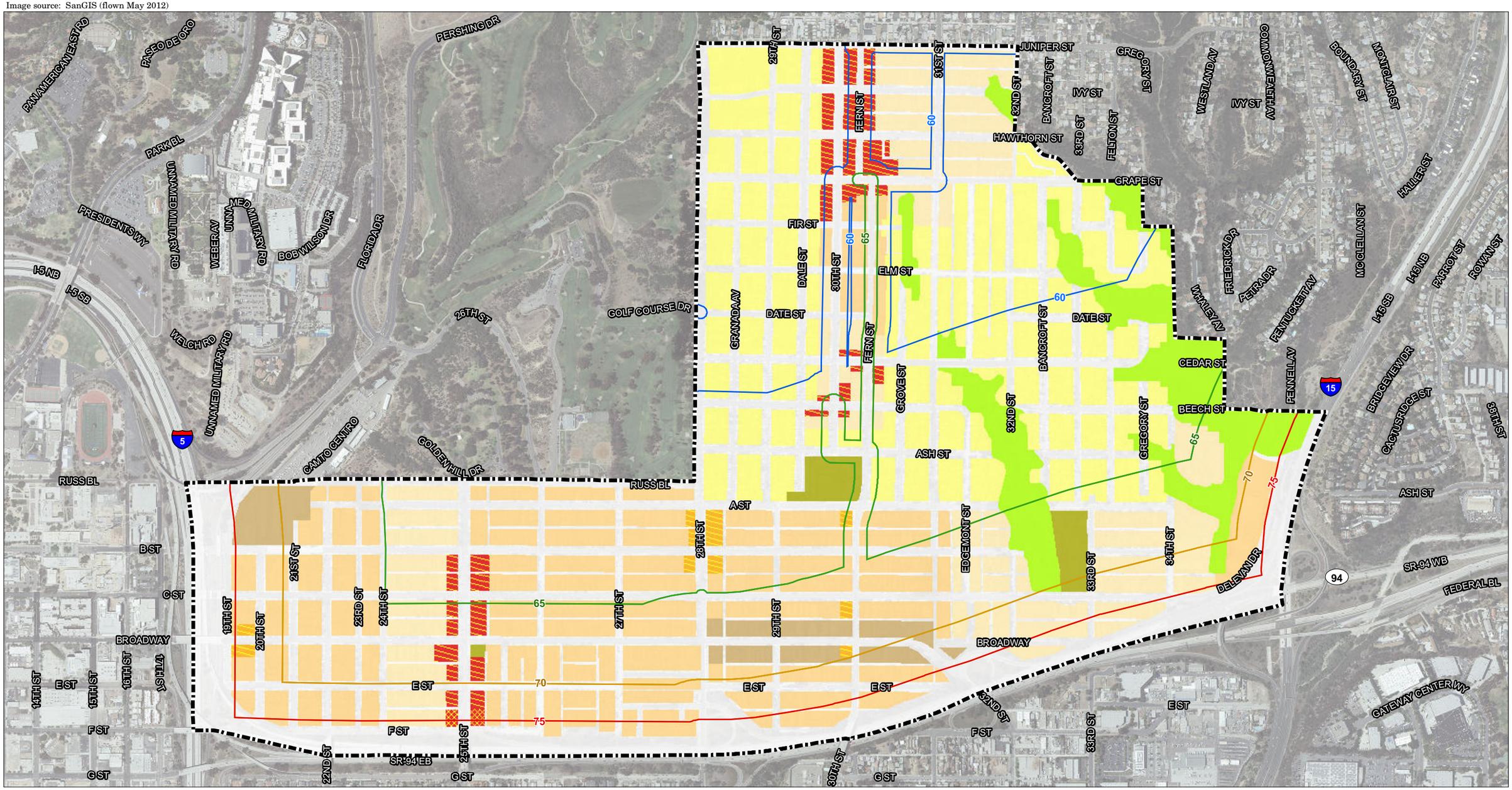
Roadway	From	To	Distance To (feet)1			
			75 dB(A) CNEL	70 dB(A) CNEL	65 dB(A) CNEL	60 dB(A) CNEL
25th Street	Russ Boulevard	C Street	3	8	27	85
	C Street	Broadway	4	12	38	120
	Broadway	F Street	6	19	60	190
26th Street	Russ Boulevard	B Street	3	9	28	89
	B Street	C Street	2	6	18	56
28th Street	Russ Boulevard	C Street	4	14	44	138
	C Street	Broadway	5	17	52	166
	Broadway	SR-94	10	30	95	301
30th Street	Grape Street	Beech Street	3	11	34	107
	Beech Street	A Street	10	31	97	308
	A Street	Broadway	10	31	97	308
	Broadway	SR-94	5	15	47	148
31st Street	Juniper Street	Grape Street	2	5	16	51
B Street	19th Street	20th Street	3	10	32	102
	20th Street	25th Street	3	8	27	85
	25th Street	26th Street	4	12	37	117
	26th Street	28th Street	4	11	35	112
	28th Street	30th Street	3	9	28	89
Beech Street	28th Street	Fern Street	3	10	31	97
Broadway	19th Street	20th Street	2	7	21	66
	20th Street	25th Street	3	9	27	87
	25th Street	28th Street	2	6	19	60
	28th Street	30th Street	2	5	17	54
	30th Street	SR-94	4	11	36	115
C Street	19th Street	20th Street	3	10	30	95
	20th Street	25th Street	2	7	22	71
	25th Street	28th Street	3	8	27	85
	28th Street	30th Street	2	6	20	64
	30th Street	34th Street	4	12	39	123
Cedar Street	Fern Street	Felton Street	2	5	17	54
Fern Street	Juniper Street	Grape Street	3	10	31	97
	Grape Street	A Street	5	17	52	166
Grape Street	30th Street	31st Street	3	10	31	97

Table 7.6-3
Future Vehicle Traffic Contour Distances – Golden Hill

Roadway	From	To	Distance To (feet)1			
			75 dB(A) CNEL	70 dB(A) CNEL	65 dB(A) CNEL	60 dB(A) CNEL
Balboa Park						
Florida Drive	Morley Field Drive	Zoo Place	11	35	109	346
Golf Course Drive	26th Street	28th Street	2	5	17	52
	Space Theater Way	Presidents Way	18	57	182	574
	Presidents Way	SR-163 NB On-Ramp	23	74	234	740
Pershing Drive	Redwood Street	Florida Drive	27	87	275	869
	Florida Drive	I-5 Ramps	59	186	587	1,858
	I-5 Ramps	B Street	5	16	50	158
Freeways						
I-5	Old Town Avenue	Washington Street	315	680	1,464	3,155
	Washington Street	Sassafras Street	262	565	1,218	2,624
	Sassafras Street	Pacific Highway	266	574	1,237	2,665
	Pacific Highway	India Street	315	680	1,464	3,155
	India Street	Hawthorn Street	320	690	1,487	3,204
	Hawthorn Street	First Avenue	288	620	1,335	2,877
	First Avenue	Sixth Avenue	335	723	1,557	3,355
	Sixth Avenue	SR-163	374	805	1,734	3,735
	SR-163	Pershing Drive	351	757	1,630	3,513
	Pershing Drive	SR-94	346	745	1,606	3,459
	SR-94	Imperial Avenue	292	629	1,356	2,922
SR-15	I-805	SR-94	199	429	924	1,991
SR-94	25th Street	28th Street	271	583	1,256	2,706
	28th Street	30th Street	292	629	1,356	2,922
	30th Street	SR-15	297	639	1,377	2,967

[1]Roadway noise is measured from the roadway centerline.

Image source: SanGIS (flown May 2012)



Golden Hill Community Plan Boundary

Future Noise Contours

- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL

Proposed Land Use (Draft)

Residential

- Residential - Low : 5-9 Du/Ac
- Residential - Low Medium : 10-15 Du/Ac
- Residential - Medium : 16-29 Du/Ac
- Residential - Medium High : 30-44 Du/Ac

Commercial, Employment, Retail, and Services

- Community Commercial - Residential Permitted : 0-29 Du/Ac
- Community Commercial - Residential Permitted : 0-44 Du/Ac
- Neighborhood Commercial - Residential Permitted : 0-29 Du/Ac

Park, Open Space, and Recreation

- Open Space

Institutional, and Public/Semi-Public Facilities

- Institutional

0 Feet 800

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FIGURE 7.6-3

Future (2035) Traffic Noise Contours – Golden Hill

In the Golden Hill CPU area, noise levels for all land uses would be incompatible [i.e., greater than 75 dB(A) CNEL] at areas located approximately 262 to 374 feet from I-5, 199 feet from SR-15, and 271 to 297 feet from SR-94. Noise levels for sensitive land uses would be incompatible [i.e., greater than 70 dB(A)CNEL] at areas located approximately 565 to 805 feet from I- 5, 429 feet from SR-15, and 583 to 639 feet from SR-94 (see Figure 7.6-3). These areas are currently developed and the proposed Golden Hill CPU and associated discretionary actions would not result in a change in land use in these areas or introduce new sensitive land uses in these areas. Thus, while land uses in these areas would be exposed to noise levels that exceed General Plan guidelines, this noise exposure would not be a significant noise impact resulting from implementation of the proposed Golden Hill CPU and associated discretionary actions as they would be the same as with the existing Community Plan. Additionally, per Section B of the General Plan Noise Element, any future multi-family and mixed-use residential use exposed to noise levels up to 75 dB(A) CNEL must include attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses.

Furthermore, policies in the proposed Golden Hill CPU and General Plan and CCR Title 24 would reduce traffic noise exposure because they set standards for the siting of sensitive land uses. General Plan policy NE-A.4 requires an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines. Site-specific exterior noise analyses that demonstrate that the project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility guidelines of the General Plan would be required as part of future discretionary development proposals. Additionally, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility guidelines of the General Plan would be required for land uses located in areas where exterior noise levels exceed the noise and land use compatibility thresholds as defined in the General Plan Noise Element, Table N-3. This requirement is implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 dB(A) CNEL). With this framework, exterior traffic noise impacts associated with new development requiring discretionary approvals and interior traffic noise impacts for both ministerial and discretionary projects would be less than significant.

However, in the case of exterior noise impacts associated with ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable.

Impact 7.6-3 A significant impact would occur for ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours as shown on Figure 7.6-3 of this PEIR.

Issue 3 Airport Compatibility

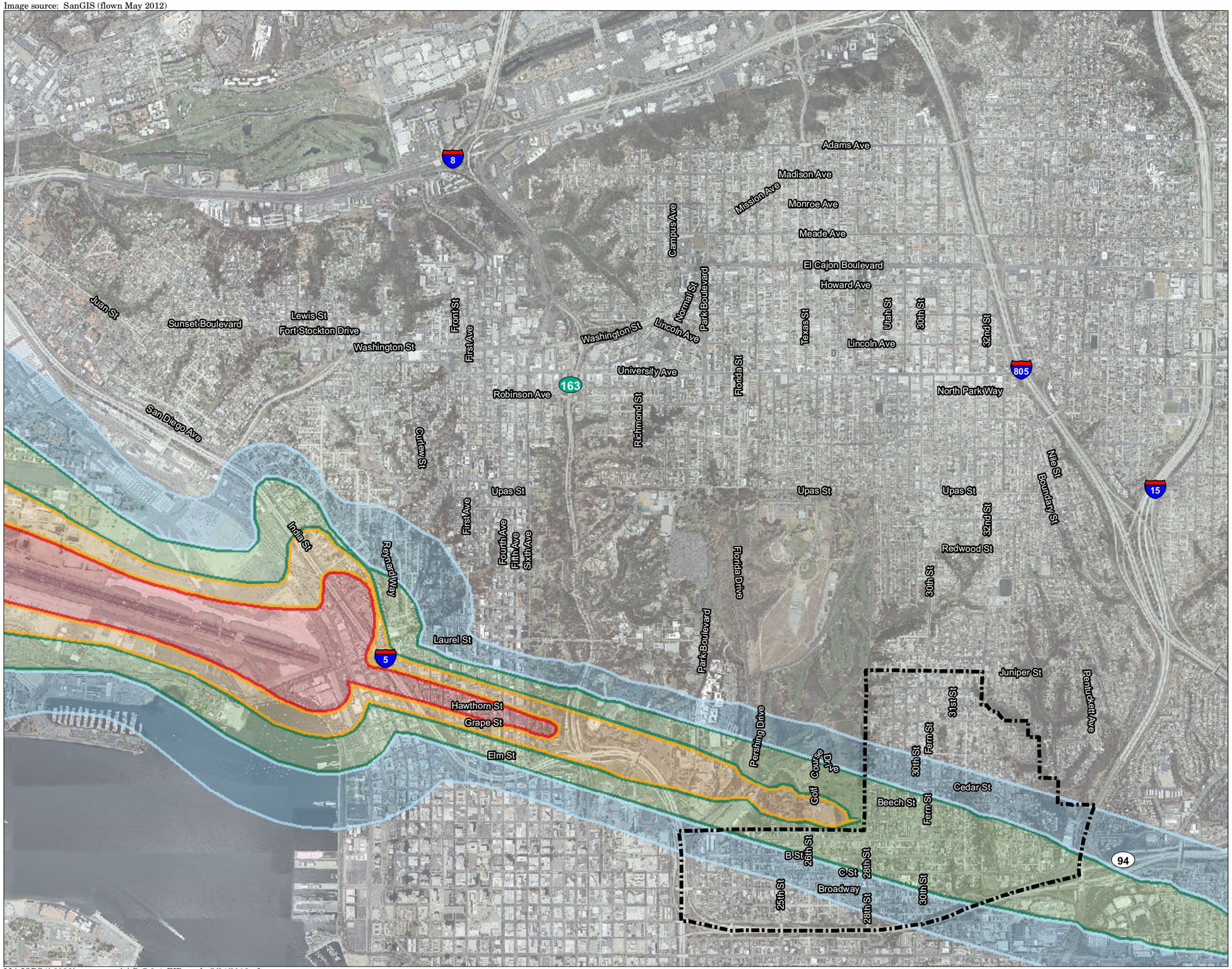
Would the proposed project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?

A significant impact would occur if implementation of the proposed Golden Hill CPU would result in land uses which are not compatible with aircraft noise levels as defined by an adopted ALUCP. The SDIA is located approximately 2.5 miles west of the Golden Hill CPU area. As shown in Figure 7.6-4, the central portion of the Golden Hill planning area would be exposed to aircraft noise levels exceeding 60 dB(A) CNEL and up to 70 dB(A) CNEL for those uses located directly under the flight path as shown in the ALUCP for SDIA. The ALUCP conditionally allows future residential uses in areas above the 65 dB(A) CNEL in locations where community plans have allowed residential. Residential uses located where noise levels due to aircraft operations at the SDIA exceed 60 dB(A) CNEL would be exposed to potentially significant aircraft noise.

There are existing residential and commercial land uses located where aircraft noise levels would exceed 60 dB(A) CNEL. However, the proposed Golden Hill CPU would not result in a change to these existing uses or a change in SDIA operations.

Per the City Significance Determination Thresholds, if a future project implemented under the proposed Golden Hill CPU is proposed within the 60 dB(A) CNEL and greater (as shown in the ALUCP for SDIA), the potential exterior noise impacts from aircraft noise would not constitute a significant environmental impact. However, interior noise impacts would be regulated by the requirement for residential development within the 60 dB(A) CNEL and greater (as shown in the ALUCP for SDIA) to reduce interior noise levels attributable to airport noise to 45 dB(A) CNEL. Interior noise levels for new construction of multi-family units are addressed through implementation of Title 24 of the California Code of Regulations (see also General Plan policies NE-I.1 and NE-I.2). Additional insulation and upgraded building materials would be required so that interior noise levels do not exceed the interior noise standards specified in Table 5-5. Site-specific interior noise analyses demonstrating compliance with the interior noise compatibility standards would be required for land uses located in areas where exterior noise levels exceed the ALUCP noise and land use compatibility criteria presented in Table 5-5. The City currently submits both discretionary and ministerial projects that increase residential units and non-residential floor area and change in use to the Airport Land Use Commission for a consistency determination with the ALUCP. With this framework, noise impacts to new development would be less than significant.

Image source: SanGIS (flown May 2012)



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Golden Hill Community Plan Boundary

Aircraft Noise Contours

- 60-65 dB CNEL
- 65-70 dB CNEL
- 70-75 dB CNEL
- >75 dB CNEL

0 Feet 2,200

FIGURE 7.6-4

Airport Noise Contours – Golden Hill

Additionally, the San Diego County Regional Airport Authority, as the operator of SDIA, has an Airport Noise Mitigation Office and has implemented a number of programs to reduce the aircraft noise impact on the community. Actions include the enforcement of a curfew on departing aircraft and the Quieter Home Program. The Quieter Home Program provides sound insulation retrofits for residences located within the 65 dB(A) CNEL contour with the goal of reducing interior noise levels by at least 5 dB(A). Existing residences located in the Golden Hill CPU area where exterior noise levels due to the San Diego International Airport exceed 65 dB(A) CNEL are eligible for this program (note that eligibility to participate in the program is based on the noise exposure maps prepared under 14 CFR Part 150, which are different than the ALUCP contour maps). Figure 7.6-5 shows a map of the parcels that have participated in the program as of January 2015. The existing residential uses adjacent to 25th Street between Russ Boulevard and A Street and Beech Street between 28th Street and 29th Street are eligible for the SDIA Quieter Home Program.

The proposed Golden Hill CPU would not result in impacts to existing uses because the proposed Golden Hill CPU would not result in a change to these existing uses or a change in SDIA operations. Because future development is required to provide noise attenuation consistent with the Noise Element of the General Plan and the ALUCP for the SDIA, implementation of the proposed Golden Hill CPU would result in a less than significant impact from aircraft noise.

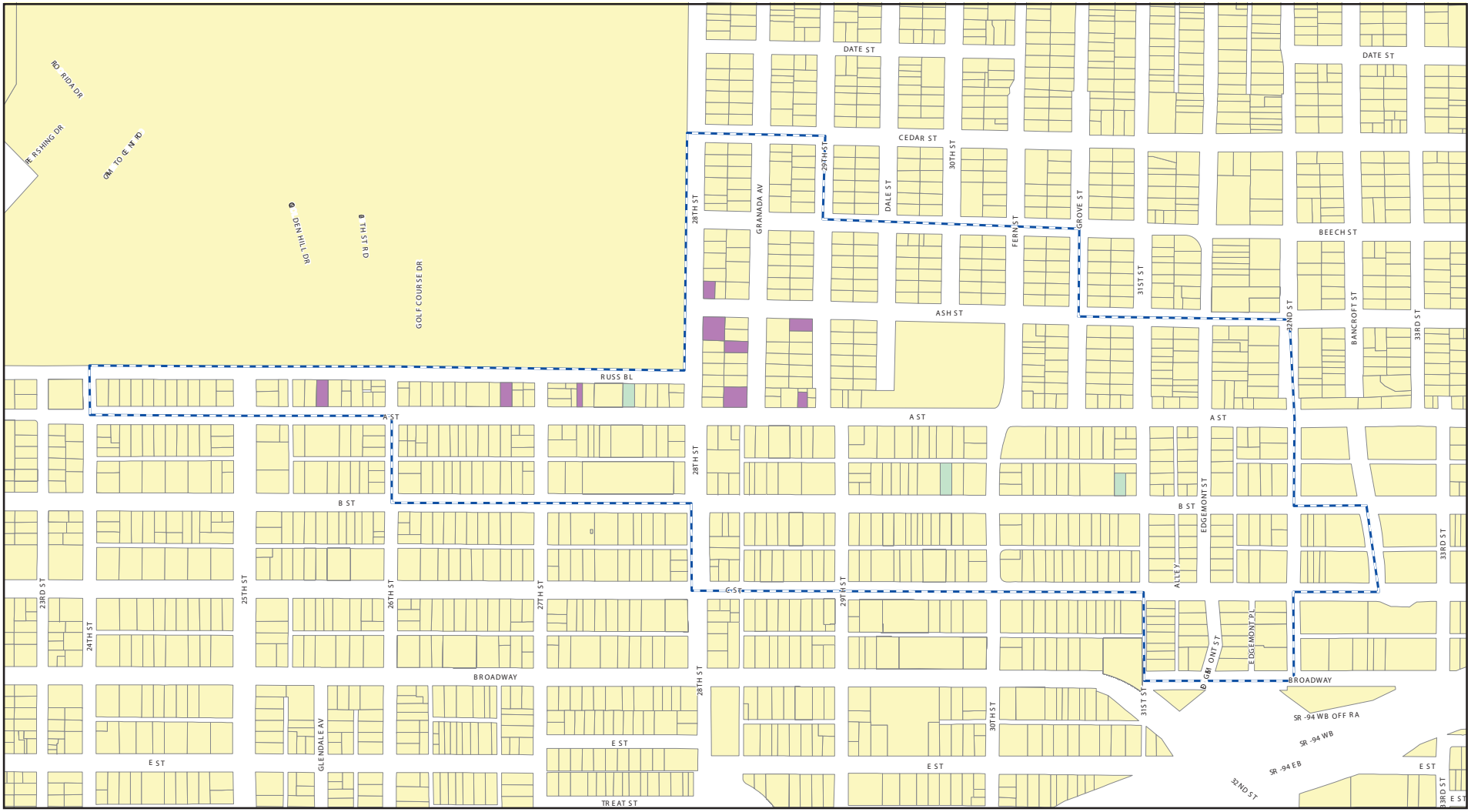
Issue 4 Noise Ordinance Compliance

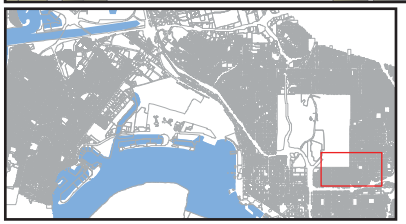
Would the proposed project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?

A significant impact would occur if implementation of the proposed Golden Hill CPU resulted in the exposure of people to noise levels that exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code as detailed in Section 5.6.2.2 of Chapter 5, Regulatory Framework. Stationary sources of noise include activities associated with a given land use. For example, noise sources in commercial uses would include car washes, fast food restaurants, auto repair facilities, parking lots, and a variety of other uses. Additionally, due to the number of eating and drinking establishments in the Golden Hill CPU area, Golden Hill experiences elevated noise levels associated with these uses.

Mixed-use areas would contain residential and commercial interfaces. Mixed-use and areas where residential uses are located in proximity to commercial sites would result in an exposure of sensitive receptors to noise. The interface between commercial and residential uses would be exposed to noise due to traffic, loading docks, mechanical equipment [such as generators and HVAC units], deliveries, trash-hauling activities, and customer and employee use of commercial facilities. Limiting truck idling time and enclosing external equipment (generators, HVAC units, etc.) that are adjacent to residential uses would reduce stationary noise levels.

Map Source: San Diego County Regional Airport Authority





Completed Parcels
Completed Parcels 2014
Ocean/Bay
Program Boundary

FIGURE 7.6-5
Quieter Home Program Participation – Golden Hill

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Although noise-sensitive residential land uses would be exposed to noise associated with the operation of commercial uses, policies in place are intended to control noise and reduce noise impacts between various land uses. The noise policies, as contained in the General Plan and the proposed Golden Hill CPU and regulations in the Noise Ordinance are in place to control noise and reduce noise impacts between various land uses. These include the requirement for noise studies, limits on hours of operation for various noise-generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. In addition, enforcement of the federal, State, and local noise regulations would control impacts.

Moreover, the proposed Golden Hill CPU includes policies to reduce noise impacts. These policies would be applied as future development is proposed to implement the proposed Golden Hill CPU. Given implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts would be less than significant.

Issue 5 Temporary Construction Noise

Would the proposed project result in the exposure of people to significant temporary construction noise?

a. Construction Noise

A significant impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary actions resulted in the exposure of people to significant temporary construction noise. Future development as allowed under the proposed Golden Hill CPU and associated discretionary actions could potentially result in temporary ambient noise increase due to construction activities.

No specific construction or development is proposed under the proposed Golden Hill CPU at this time, but impacts could occur when future development under the proposed Golden Hill CPU is proposed. Future development as allowed under the proposed Golden Hill CPU could potentially result in temporary ambient noise increases due to construction activities. Construction noise would be generated by diesel-powered construction equipment used for site preparation and grading, removal of existing structures and pavement, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove the spoils from excavation.

Due to the developed nature of the Golden Hill CPU area, there is a high likelihood that construction activities would take place adjacent to existing structures. Construction activities may include demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last weeks to months and may produce substantial vibration. Excavation for underground levels could also occur on some project sites, and vibratory pile driving could be used to stabilize the walls of excavated areas. Piles or drilled caissons may also be used to support building foundations.

Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition/land clearing, grading and excavation, erection). Construction noise in any one particular area would be short-term and would include noise from activities such as site preparation, truck hauling of material, pouring of concrete, and use of power tools. Noise would also

be generated by construction equipment, including earthmovers, material handlers, and portable generators, and could reach high levels for brief periods. Typical construction noise levels are discussed in Appendix F.

The exact location of construction activities are not known at this time. Due to the highly developed nature of the Golden Hill CPU area, it is likely that sensitive receptors would be located in proximity to construction activities. The City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance.

As noted above, construction equipment would generate maximum noise levels between 85 and 90 dB at 50 feet from the source when in operation. Hourly average noise levels would be 82 dB(A) at 50 feet from the center of construction activity when assessing the loudest pieces of equipment working simultaneously. Noise levels would vary depending on the nature of the construction including the duration of specific activities, nature of the equipment involved, location of the particular receiver, and nature of intervening barriers. Construction noise levels of 82 dB(A) Leq at 50 feet would attenuate to 75 dB(A) L_{eq} at 110 feet. Therefore, significant impacts would occur if sensitive land uses are located closer than 110 feet of construction activities.

Impact 7.6-4 A significant noise impact due to construction noise would occur if sensitive land uses are located within 110 feet of future construction activities.

While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the Golden Hill CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land uses to significant noise levels (Impact 7.6-4).

b. Vibration - Construction

Construction of projects implemented under the proposed Golden Hill CPU and associated discretionary actions would likely be located adjacent to existing structures. Construction activities may include demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last several weeks to months and may produce substantial vibration. Excavation for underground levels could also occur on some project sites, and vibratory pile driving could be used to stabilize the walls of excavated areas. Piles or drilled caissons may also be used to support building foundations.

As with any type of construction, vibration levels during any phase may at times be perceptible. However, non-pile driving or foundation work construction phases that have the highest potential of producing vibration (such as jackhammering and other high power tools) would be intermittent and would only occur for short periods of time for any individual project site. By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum.

Construction pile driving has the potential to generate the highest groundborne vibration levels and is the primary concern for structural damage when it occurs within 100 feet of structures. Vibration levels generated by pile driving activities would vary depending on project conditions, such as soil conditions, construction methods, and equipment used. Pile driving activities generate vibrations at various frequencies, with the dominant frequency of propagating waves from impact sources ranging between 3 and 60 Hz. Using the middle range for illustration purposes, equipment operating at a frequency range of 30 Hz would exceed the perceptible range at approximately 100 feet. Pile driving within 95 feet of existing structures has the potential to exceed the 0.20 inch per second PPV threshold. Thus, implementation of future land uses under the proposed Golden Hill CPU would have the potential to result in a significant impact related to construction related vibration.

Impact 7.6-5 If future pile driving occurs within 95 feet of existing structures, a potentially significant impact would result.

c. Vibration – Operation

Commercial operations, on occasion, utilize equipment or processes that have a potential to generate groundborne vibration. However, vibrations found to be excessive for human exposure that are the result of commercial machinery are generally addressed from an occupational health and safety perspective as indicated above. The residual vibrations are typically of such low amplitude that they quickly dissipate into the surrounding soil and are rarely perceivable at the surrounding land uses. Additionally, the commercial uses that may be constructed under the proposed Golden Hill CPU and associated discretionary actions would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with proposed Golden Hill CPU and associated discretionary actions implementation would be less than significant.

Cumulative Impacts

The analysis provided above for each issue area is cumulative in nature because the analysis considers noise and vibration impacts associated with build-out of the entirety of the Golden Hill CPU area and the traffic assumptions used in the analysis includes cumulative traffic associated with build-out of neighboring communities. Noise impacts associated with build out of neighboring CPUs such as the North Park and Uptown would be localized in nature. For example, construction of restaurants or commercial uses in Uptown or North Park, would not affect residences in Golden Hill with the exception of development that may occur at the boundary of the CPU areas. However, build out of land uses within each CPU area would be subject to the same General Plan policies, noise ordinance requirements, and Title 24 standards discussed in this document. Thus, cumulative noise impacts would be less than significant.

7.6.5 Significance of Impacts

Issue 1 Ambient Noise

An increase in ambient vehicular traffic noise in the Golden Hill CPU area would result from continued build-out of the proposed Golden Hill CPU and increases in traffic due to regional growth. A significant increase would occur adjacent to several street segments in the Golden Hill CPU area. The increase in ambient noise levels could result in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan. Thus, impacts to existing noise sensitive land uses would be significant (Impact 7.6-1).

For new discretionary development, there is an existing regulatory framework in place that would ensure future projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions would not be exposed to ambient noise levels in excess of the compatibility levels in the General Plan. Thus, noise impacts to new discretionary projects would be less than significant.

However, in the case of ministerial projects, there is no procedure to ensure that exterior noise would be adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 7.6-2).

Issue 2 Vehicular Noise

In the Golden Hill CPU area, noise levels for all land uses would be incompatible [i.e., greater than 75 dB(A) CNEL] closest to the freeways and specific segments of Sixth Avenue and Grape Street. These areas are currently developed and the proposed Golden Hill CPU and associated discretionary actions would not change the land use in these areas. Thus, while land uses in these areas would be exposed to noise levels that exceed General Plan standards, this noise exposure would not be a significant noise impact resulting from implementation of the proposed Golden Hill CPU and associated discretionary actions. No mitigation is required at the program level.

An existing regulatory ~~mitigation~~ framework and review process exists for new discretionary development in areas exposed to high levels of vehicle traffic noise. Individual projects would be required to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with future discretionary projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant and unavoidable (Impact 7.6-3).

Issue 3 Airport Compatibility

Based on the projected airport noise contours for the SDIA, there are sensitive receptors in the Golden Hill CPU area that are located where noise levels due to aircraft operations exceed 60 dB(A) CNEL. Because future development is required to provide noise attenuation consistent with the Noise Element of the General Plan and the ALUCP for the SDIA, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact from aircraft noise.

At the project-level, future development must include noise attenuation consistent with the Noise Element of the General Plan and the Airport Land Use Compatibility Plan for the SDIA, therefore impacts related to airport noise would remain less than significant.

Issue 4 Noise Ordinance Compliance

Mixed-use areas would contain residential and commercial interfaces. Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise. Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial uses, City policies and regulations would control noise and reduce noise impacts between various land uses. In addition, enforcement of the federal, state, and local noise regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the Municipal Code, impacts would be less than significant and no mitigation is required at the program level.

Issue 5 Temporary Construction Noise

a. Construction Noise

Construction activities related to implementation of the proposed Golden Hill CPU and associated discretionary actions would potentially generate short- term noise levels in excess of 75 dB(A) Leq at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the Golden Hill CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land use to significant noise levels. While future development projects would be required to incorporate feasible mitigation measures, due to the close proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise would ~~remain~~be potentially significant ~~and unavoidable~~ (Impact 7.6-4).

b. Vibration – Construction

By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties,

perceptible vibration can be kept to a minimum and as such would result in a less than significant impact with respect to perception. However, pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second, and would be potentially significant (Impact 7.6-5).

c. Vibration – Operation

Post-construction operational vibration impacts could occur as a result of commercial operations that are implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions.

The commercial uses that would be constructed under the proposed Golden Hill CPU and associated discretionary actions would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the proposed Golden Hill CPU implementation and associated discretionary actions would be less than significant. No mitigation is required.

7.6.6 Mitigation Framework

Increases in ambient noise levels resulting in the exposure of existing noise sensitive land uses to noise levels in excess of the compatibility levels established in the General Plan Noise Element, would be significant and unavoidable (Impact 7.6-1). No feasible mitigation has been identified at the program level to reduce this impact to less than significant.

New noise sensitive land uses that require only a ministerial permit would be subject to significant and unavoidable exterior traffic noise impacts resulting from increases in ambient noise levels generated from build-out of the proposed Golden Hill CPU (Impact 7.6-2). Additionally, significant and unavoidable impacts would occur for future ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours (Impact 7.6-3). These impacts would be significant and unavoidable. No feasible mitigation has been identified at the program level to reduce these impacts to less than significant as there is no mechanism to require exterior noise analysis and attenuation for these ministerial projects.

In order to mitigate impacts relative to <u>construction noise and compliance with</u> Municipal Code – Construction (Impact 7.6-4), the following mitigation measure would be implemented.

NOISE 7.6-1 At the project level, ~~future~~ development projects will be required to incorporate feasible mitigation measures. Typically, noise can be reduced to comply with City standards when standard construction noise control measures are enforced at the project site and when the duration of the noise-generating construction period is limited to one construction season (typically one year) or less.

- Construction activities shall be limited to the hours between 7:00 A.M. and 7:00 P.M. Construction is not allowed 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. (Consistent with Section 59.5.0404 of the San Diego Municipal Code).

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers.
- Acoustically shield stationary equipment located near residential receivers with temporary noise barriers.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.

In order to mitigate impacts relative to vibration during construction (Impact 7.6-5), the following mitigation measure would be implemented.

NOISE 7.6-2 For discretionary projects where construction would include vibration-generating activities, such as pile driving, within 95 feet of existing structures, site-specific vibration studies shall be conducted to ~~determine the area of impact and to present appropriate mitigation measures that may include the following~~ensure the development project would not adversely affect adjacent properties to the satisfaction of the Chief Building Official. Such efforts shall be conducted by a qualified structural engineer and could include:

- Identify sites that would include vibration compaction activities such as pile driving and have the potential to generate groundborne vibration and the sensitivity of nearby structures to groundborne vibration. ~~This task shall be conducted by a qualified structural engineer.~~
- Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after

construction conditions. Construction contingencies would be identified for when vibration levels approach the limits.

- ~~At a minimum, m~~Monitor vibration during initial demolition activities and during pile-driving activities. Monitoring results may indicate the need for more or less intensive measurements.

- When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures.

- Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

7.6.7 Significance of Impacts after Mitigation

Impacts to existing noise sensitive land uses due to the increase in ambient noise levels associated with build-out of the proposed Golden Hill CPU and associated discretionary actions would remain significant and unavoidable (Impact 7.6-1). No feasible mitigation measures have been identified to address this impact because there is no mechanism or funded program in place to provide noise attenuation at existing structures that would be exposed to ambient noise increases.

There are no feasible mitigation measures to reduce impacts from ambient noise level increases associated with future ministerial development within the Golden Hill CPU area (Impact 7.6-2); thus, ambient noise impacts associated with future ministerial projects would remain significant and unavoidable. Similarly, impacts associated with future ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours would be significant and unavoidable (Impact 7.6-3).

Regarding temporary construction noise impacts (Impact 7.6-4), future construction projects would be required to incorporate the standard controls outlined in NOISE 7.6-1, which would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With the implementation of these controls, and the limited duration of the noise-generating construction period, the substantial temporary increase in ambient noise levels would be less than significant.

Regarding vibration impacts during construction (Impact 7.6-5), pile driving within 95 feet of existing structures has the potential to exceed 0.20 inch per second, resulting in a potentially significant impact. Implementation of mitigation measure NOISE 7.6-2 would reduce construction-related vibration impacts; however, at the program-level it cannot be known whether the measures would be adequate to minimize vibration levels to less than significant. Thus, even with implementation of NOISE 7.6-2, construction related vibration impacts would be significant and unavoidable.

7.7 Historical Resources

This section analyzes the potential impacts on historical resources due to implementation of the proposed Golden Hill Community Plan Update (CPU) and associated discretionary actions. It documents the historical background for the Golden Hill community and addresses prehistoric, historic, archaeological, and sacred sites. The information in this section is based on the *Community Plan Update for the Community of Greater Golden Hill Prehistoric Cultural Resources* study (AECOM, January 2015) and the *Greater Golden Hill Community Plan Area Historic Resources Survey* (Historic Resources Group, June 2014) and other primary and secondary sources. These reports are included in Appendixes M-1 and M-2, respectively, to this PEIR.

7.7.1 Existing Conditions

A general discussion of the environmental setting relative to historical resources and the applicable regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. The discussion and analysis included in this chapter focuses on the Greater Golden Hill community ~~(formerly known as Greater Golden Hill)~~, potential impacts to its historic resources, policies in the proposed Golden Hill CPU directed at protecting the community's historical, archaeological and tribal cultural resources, and presentation of a mitigation framework.

Historical resources (also referred to as cultural resources) are physical features, both natural and constructed, which reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of archaeological sites, tribal cultural resources, and built environment resources that are determined to be significant under the California Environmental Quality Act (CEQA).

The Golden Hill Community Plan area is one of the older areas of the City, characterized by its hilly topography and strict street grid. The community has been developed since the late 19th century into residential neighborhoods with commercial use areas along the major thoroughfares in the area, interspersed with relatively undeveloped steep canyons to the southwest and southeast into Las Choyas Valley and Los Chollas Creek. These canyons are wildlife corridors and, prehistorically, they were probably travel routes into the valley areas for indigenous Native Americans.

The community is primarily developed with one- and two-story single-family residences dating from the last quarter of the 19th century through the 1920s, reflecting the popular architectural styles of the day, including Victorian-era styles, Craftsman, Spanish Colonial Revival, and Prairie. Many of the

area's larger two-story homes have since been converted into multi-unit buildings. Multi-family residential development includes apartment buildings and residential courts from the teens through the 1920s, with occasional postwar infill. Commercial development is primarily clustered along historical streetcar routes, including 25th, 30th, and B Streets. Neighborhood serving commercial nodes occur at well-traveled intersections, including 28th and B, 30th and Beech, and Fern and Grape Streets. The Golden Hill Community Plan area contains little institutional or civic development. The Community Plan area is composed of two distinct neighborhoods, Golden Hill and South Park. Golden Hill developed somewhat earlier and was populated by some of the City's most affluent residents during the late 19th and early 20th centuries. South Park's development followed, with more modest homes designed to cater to the middle class during the early 20th century.

7.7.1.1 Golden Hill Prehistory

The prehistoric cultural sequence in San Diego County is generally thought of as three basic periods: the Paleoindian, locally characterized by the San Dieguito complex; the Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and the Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay. The Ethnohistoric period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in San Diego and the founding of Mission San Diego de Alcalá in 1769 brought profound changes in the lives of the Kumeyaay. and continued through the Spanish (1769-1821) and Mexican (1821-1848) periods and into the American period (1848-present). These cultural sequences are further described in Chapter 2.0 – Environmental Setting.

7.7.1.2 Golden Hill History

The history of Golden Hill can be generally characterized into four themes significant to the development of the community: The Early History of Greater Golden Hill: 1769 to 1885; An Elite Residential District: 1885 to 1905; Streetcar Development: 1905 to 1930; and An Era of Transitions: 1930 to 1990. These patterns of cultural and historic development are summarized below.

a. Early History of Greater Golden Hill: 1769 to 1885

Following the Mexican-American War and the ratification of the Treaty of Guadalupe Hidalgo in 1848, California was admitted to the United States, and the expansive *ranchos* began to dissolve. In subsequent years, Federal legislation encouraged Americans to move west and establish homesteads, but Native Americans, who could neither own nor purchase land, were relegated to small rancherias, most often on the fringes of development. One of the largest rancherias in San Diego was erected in 1860 along the western slope of Golden Hill, near the present-day intersection of 20th Street and Broadway.

b. An Elite Residential District: 1885 to 1905

As a result of the financial Panic of 1873, development in Golden Hill remained at a standstill until Southern California experienced a period of unprecedented economic growth in the late 1880s. Upon the completion of the highly anticipated California Southern Railroad in 1885, San Diego was connected to the transcontinental Santa Fe line at its hub in Barstow. The events of the late 1880s brought about a renaissance to many of the subdivisions within Golden Hill, as real estate speculation once again became a lucrative enterprise.

Despite the collapse of the Great Boom in 1888, the events of the 1880s had left San Diego with an element of population and wealth. In 1895, a group of investors purchased forty acres within Golden Hill, bounded by 24th, 25th, "A" and "E" streets, and thereafter filed a subdivision map for the Golden Hill Addition. In subsequent years, Golden Hill was transformed into an established residential district.

c. Streetcar Development: 1905 to 1930

Development in the northeastern section of Golden Hill can be traced to 1870, when real estate speculators purchased a large parcel of land east of City Park (Balboa Park) and filed a subdivision map for the South Park Addition. In 1905, the rural community of South Park began to evolve into a developed residential district. In 1906, the Bartlett Estate Company financed the construction of an electric streetcar.

The completion of the streetcar line touched off a period of residential development within the northeastern section of the community, as the quasi-rural community was better connected with the City's established districts. Early development in South Park consisted almost exclusively of single-family residences. These homes were designed at the height of the Arts and Crafts movement and, as such, many embodied characteristics of Craftsman architecture, though others were designed in the Spanish Colonial Revival style.

The northeastern section of Golden Hill experienced a period of intensive growth shortly after ground was broken in 1911 for the Panama-California Exposition, given the area's proximity to Balboa Park and the Exposition ground. The majority of development consisted of single-family homes, though there were also a few small-scale apartment buildings and flats.

d. An Era of Transitions: 1930 to 1990

Although Golden Hill was among San Diego's most affluent districts by the late 1920s, the community was nonetheless impacted by the onset of the Great Depression. The next wave of activity within Golden Hill was touched off by the Second World War. The influx of war workers strained San Diego's resources and infrastructure, and the City thereafter experienced a housing shortage unparalleled in its history.

Much of Golden Hill experienced marked physical changes both during and after World War II. Development in the area – especially south of A Street – picked up once again during the 1940s and 1950s, but unlike previous years, new construction of this era consisted primarily of moderate- and

large-scale apartment complexes. By 1956, a substantial number of homes south of A Street had either been subdivided or converted for alternative uses.

Between the 1960s and 1970s, Golden Hill witnessed marked changes in its demographic makeup. The availability of affordable apartments, in conjunction with the exodus of middle and upper class homeowners to the suburbs, meant that the once-exclusive community attracted an increasing number of working class, the majority of who rented, rather than owned, their homes.

Interest in Golden Hill was regenerated in the 1970s, when two national oil crises steered many middle-class professionals back into centralized, inner-city neighborhoods. As homeownership in Golden Hill steadily increased throughout the 1980s, there emerged a growing consciousness among residents to eradicate blight, reduce density, and restore the community's historic character. In 1978, the City's Historical Resources Board designated the Golden Hill Historic District, a six-block area bounded by Balboa Park on the north, 25th Street on the east, F Street on the south, and 24th Street on the west. Following the designation of the district, there was a concerted effort by property owners and community members to preserve and embrace the heritage and built environment in Golden Hill.

7.7.1.3 Designated Historical Resources

Golden Hill is home to one National Register listed property, the Alfred Haines House located at 2470 E Street (Reference No 92000966). In addition, as of February 2016, the Golden Hill community contains 77 individually designated historical resources (Figure 7.7-1) and the Golden Hill Historic District (Figure 7.7-2) – which contains 58 contributing resources – that have been listed on the City's register by the Historical Resources Board. These resources are primarily residential in nature, but also include some institutional and commercial buildings, and are identified in the Historic Preservation Element and the City's database of designated historical resources.

7.7.2 Methodology

7.7.2.1 Historical Resources

The Historic Resources Survey was conducted using a four-step approach, which included Research, Fieldwork, Evaluation, and Documentation. The research phase involved review of various relevant City documents (municipal codes and regulations, planning reports, previous historic resources surveys, and various historic nominations), as well as various historical materials (period newspaper articles, photographs, maps).

The fieldwork phase consisted of a property-by-property inspection of the entire community plan area. Field teams identified individual properties that appeared eligible for individual designation, as well as geographically-definable areas that appeared eligible for designation as historic districts. For districts, boundaries were defined and contributing and non-contributing resources were identified.

Map Source: SanGIS

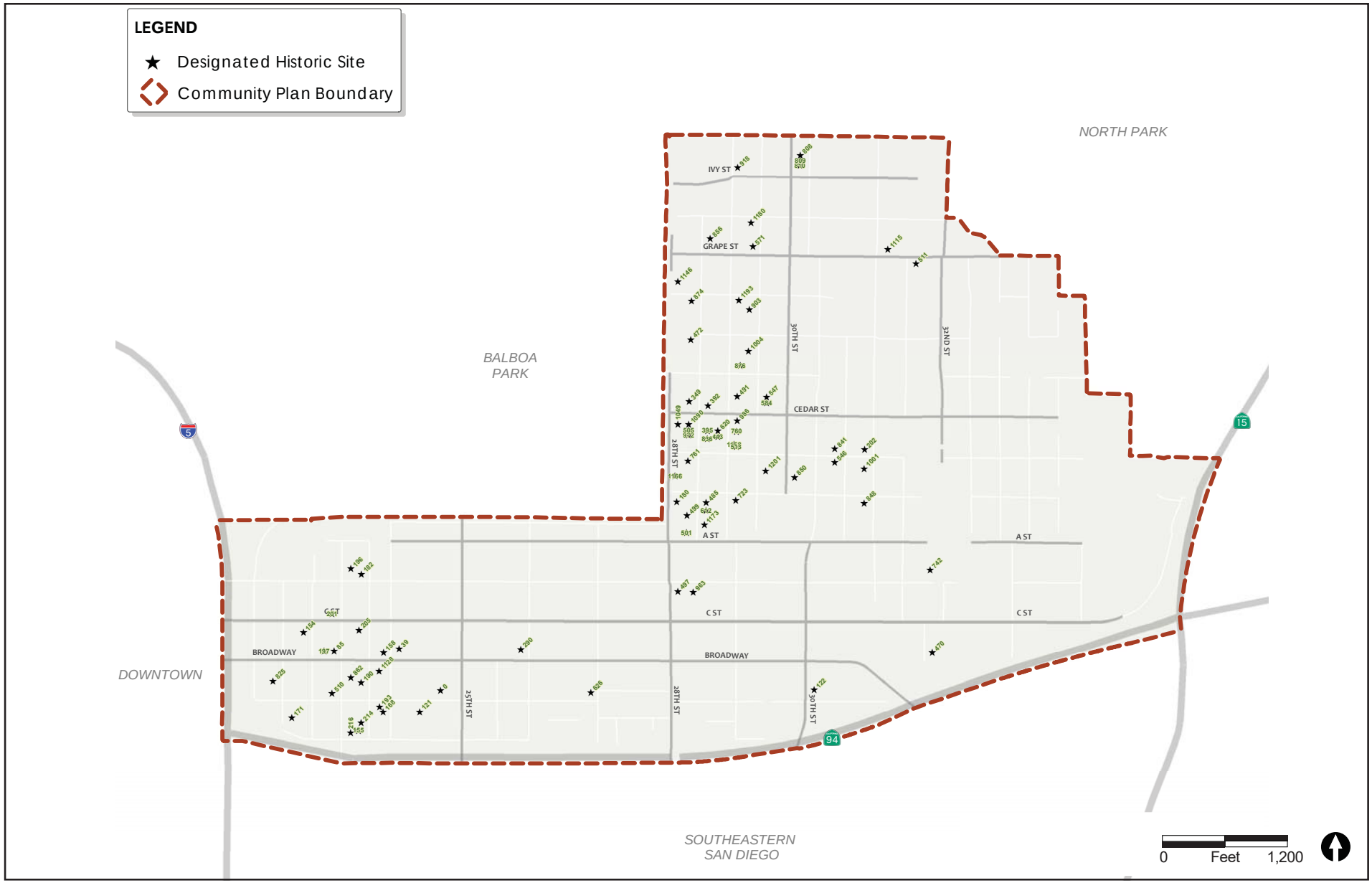


FIGURE 7.7-1

Location of City Register Designated Historic Resources – Golden Hill

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Map Source: SanGIS

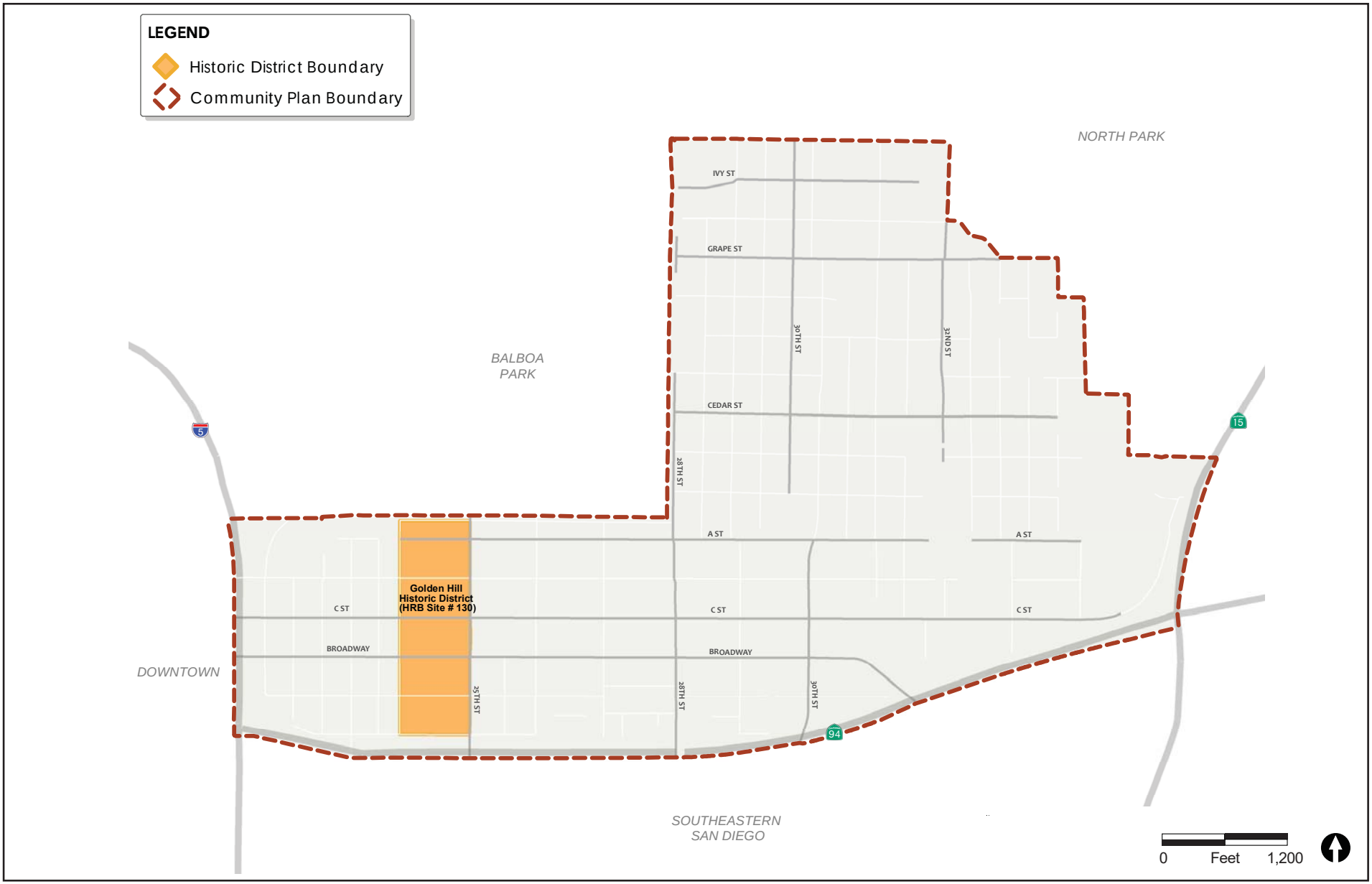


FIGURE 7.7-2

Location of City Register Designated Historic District – Golden Hill

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All properties identified in the field as potentially eligible for designation were then evaluated using the City of San Diego local designation criteria. Properties determined potentially eligible for designation on the City's Register were then evaluated for the National Register and California Register. All properties identified and evaluated as potentially eligible for listing on the San Diego Register, California Register, and/or National Register designation as part of this survey were then documented in a database.

Included as an appendix to the Historic Resources Survey is the Historic Context Statement prepared for the Golden Hill community. The Historic Context Statement was developed primarily through archival research, and synthesizes information collected from a variety of primary and secondary materials. In addition to consulting the historical resource files at the City Planning Department and the archives at Save Our Heritage Organisation, research was conducted at the San Diego Public Library, the San Diego History Center, and the libraries at the University of California, San Diego. Primary sources included historic maps, photographs and newspapers, and media advertisements. Of particular importance were review of subdivision maps, in conjunction with Sanborn Fire Insurance Maps, were used to establish broad patterns of development within Golden Hill. Historic photographs provided imagery of the community's evolving landscape and predominant architectural styles. Other primary materials included several articles, advertisements, and editorials from the archives of the Los Angeles Times and San Diego Union. Secondary sources of information were consulted to supplement these primary materials, and included later accounts of history recorded in a variety of books, essays, journals, and master's theses.

7.7.2.2 Prehistoric Resources

Cultural sensitivity levels for the Golden Hill community planning area are rated low, moderate, or high based on the results of an archival records search using the California Historical Resources Information System (CHRIS), a literature search of the South Coastal Information Center (SCIC) located a San Diego State University, a records update at the San Diego Museum of Man, a Sacred Lands File check by the Native American Heritage Commission (NAHC), and regional environmental factors.

A low sensitivity rating indicates that there are few or no previously recorded resources within the area. Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. The potential for identification of additional resources in such areas would be low. A moderate sensitivity rating indicates that some previously recorded resources were identified within the area. These are more complex resources consisting of more site structure, diversity of feature types, and diversity of artifact types. The potential for the presence of additional resources in such areas would be moderate. Areas identified as high sensitivity would indicate that the records search identified several previously recorded sites within the area. These resources may range from moderately complex to highly complex, with more-defined living areas or specialized work space areas and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted archaeological resources.

7.7.3 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's Significance Determination Thresholds, consists first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation. Based on the City's 2011 Significance Determination Thresholds, which have been adopted to guide a programmatic assessment of the proposed Golden Hill CPU and associated discretionary actions, impacts related to historical resources would be significant if the proposed Golden Hill CPU and associated discretionary actions would result in:

An alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object or site;

A substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries.

The City of San Diego's CEQA Significance Determination Thresholds define a significant historic resource as one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code; though even a resource that is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA. The City's Historical Resources Guidelines state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site specific technical report prepared as part of the environmental review process. Research priorities for the prehistoric, ethnohistoric and historic periods of San Diego history are discussed in Appendix A to the Historical Resources Guidelines. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50 square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

- The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.

- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

7.7.4 Impact Analysis

Issue 1 Historic Structures, Objects, or Sites

Would implementation of the proposed Golden Hill CPU and associated discretionary actions result in alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?

a. Historic Resources – National Register and/or Local Register

Golden Hill is home to one property on the National Register, the Alfred Haines House located at 2470 E Street (Reference No 92000966). Additionally, 77 individually designated historic resources and the Golden Hill Historic District, which contains 58 contributing resources, have been listed on the City's register by the Historical Resources Board. These designated historical resources are protected and preserved through existing General Plan policies, the historical resources regulations and guidelines of the Municipal Code, and City policies and procedures. These protections require historic review of all projects impacting these resources. Projects that do not comply with the U.S. Secretary of the Interior Standards for the Treatment of Historic Properties are required to process a development permit with for the deviations that is subject to review under CEQA.

b. Individual Local Historic Resources

Currently, there are 77 properties designated as individual local historic resources in Golden Hill. The Historic Resources Survey identified an additional 52 individual properties that appear to meet one or more of the City's local designation criteria. These include residential (single-family and multi-family), commercial, civic, and institutional properties. Of these, 40 also appear eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. All of the individual properties are listed in the Historic Resources Survey, organized by property type with photos of representative examples, included as Appendix M2 to this PEIR.

c. Potential Historic District

The Historic Resources Survey identified one potential historic district, the South Park Residential Historic District, which appears eligible for listing on the local, State and National registers. The area is bounded roughly by 28th Street, Date Street, the east side of 29th Street, and A Street (Figure 7.7-3). A larger South Park Historic District was first identified in the 1996 Mid-City Preservation Study, but was never intensively surveyed. The 1996 survey also identified a potential expansion for the designated Golden Hill Historic District. Following completion of the initial Golden Hill Historic Resources Survey, City staff was asked by members of the community to reconsider the

Map Source: SanGIS

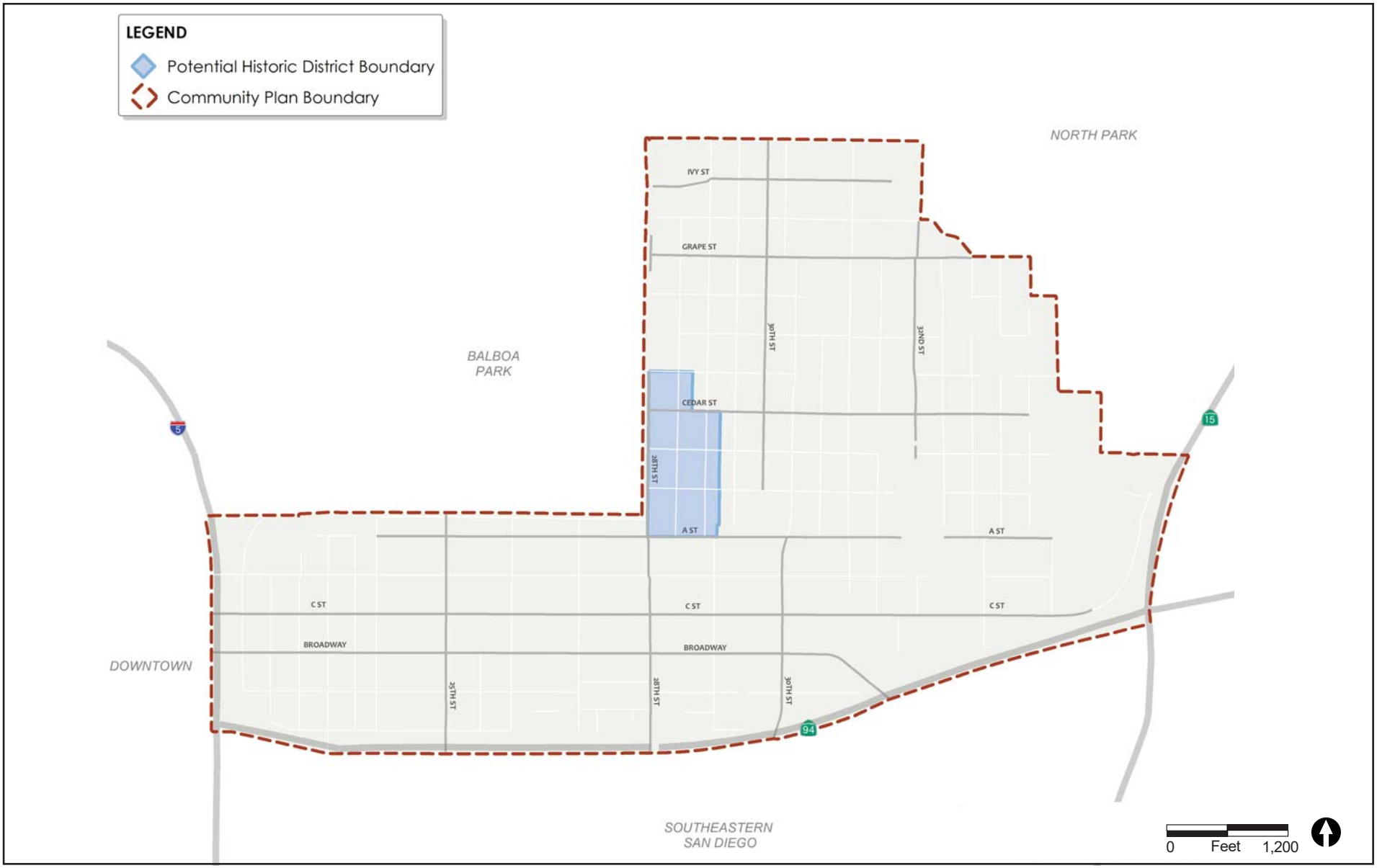


FIGURE 7.7-3

Location of Potential Historic Districts Identified in the Historic Resources Survey – Golden Hill

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eligibility of the potential historic districts identified in 1996. Staff conducted a windshield survey, and found that these areas identified in the 1996 survey do appear eligible for listing on the San Diego Register. These areas include a larger boundary for the potential South Park Historic District; as well as a new potential historic district, Culverwell & Taggart's Addition, located to the west of the designated Golden Hill District. These potential historic districts as identified in the 1996 survey and recommended by the community are shown in Figure 7.7-4 and described in the Historic Resources Survey included as Appendix M-2.

d. Multiple Property Listing

The Historic Resources Survey identified a Multiple Property Listing (MPL) potentially eligible for listing in National Register of Historic Places, the California Register of Historical Resources, and the City of San Diego Register or Historic Resources.

The Residential Court MPL is a discontiguous grouping of residential courts located throughout the Golden Hill CPU area. A tabular listing of all properties within the MPL is provided in the Historic Resources Survey. The residential courts were not developed in geographic clusters; rather, they were built as infill in previously established single-family neighborhoods. The MPL has a period of significance of 1920 to 1959, and is significant under the *Streetcar Development: 1905-1930* and *Era of Transitions: 1930-1990* contexts.

e. Resources Identified Through Public Outreach

Substantial public outreach with the Golden Hill Planning Group, regional and local preservation groups, and members of the community occurred throughout the development of the Historic Context and completion of the Historical Resources Survey for the proposed Golden Hill CPU. This information was considered and often incorporated into the results and recommendations of the survey. Following distribution of the Draft Survey Report, City staff conducted additional outreach with these groups to identify any resources not included in the survey that the community believed to be historically significant. These resources are shown in Figure 7.7-4.

f. Regulatory Framework

The proposed Golden Hill CPU and associated discretionary actions would have a significant direct impact on historical resources if it would result in the demolition, relocation, or substantial alteration of a resource listed in or determined to be eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR), including contributors to NRHP and CRHR-eligible Historic Districts, or the San Diego Historical Resources Register, or which otherwise meets CEQA criteria for historic resources. Grading, excavation, and other ground-disturbing activities associated with development projects that affect important (as determined per the Historical Resources Guidelines) archaeological sites or traditional cultural properties would also constitute a significant direct impact.

Map Source: SanGIS

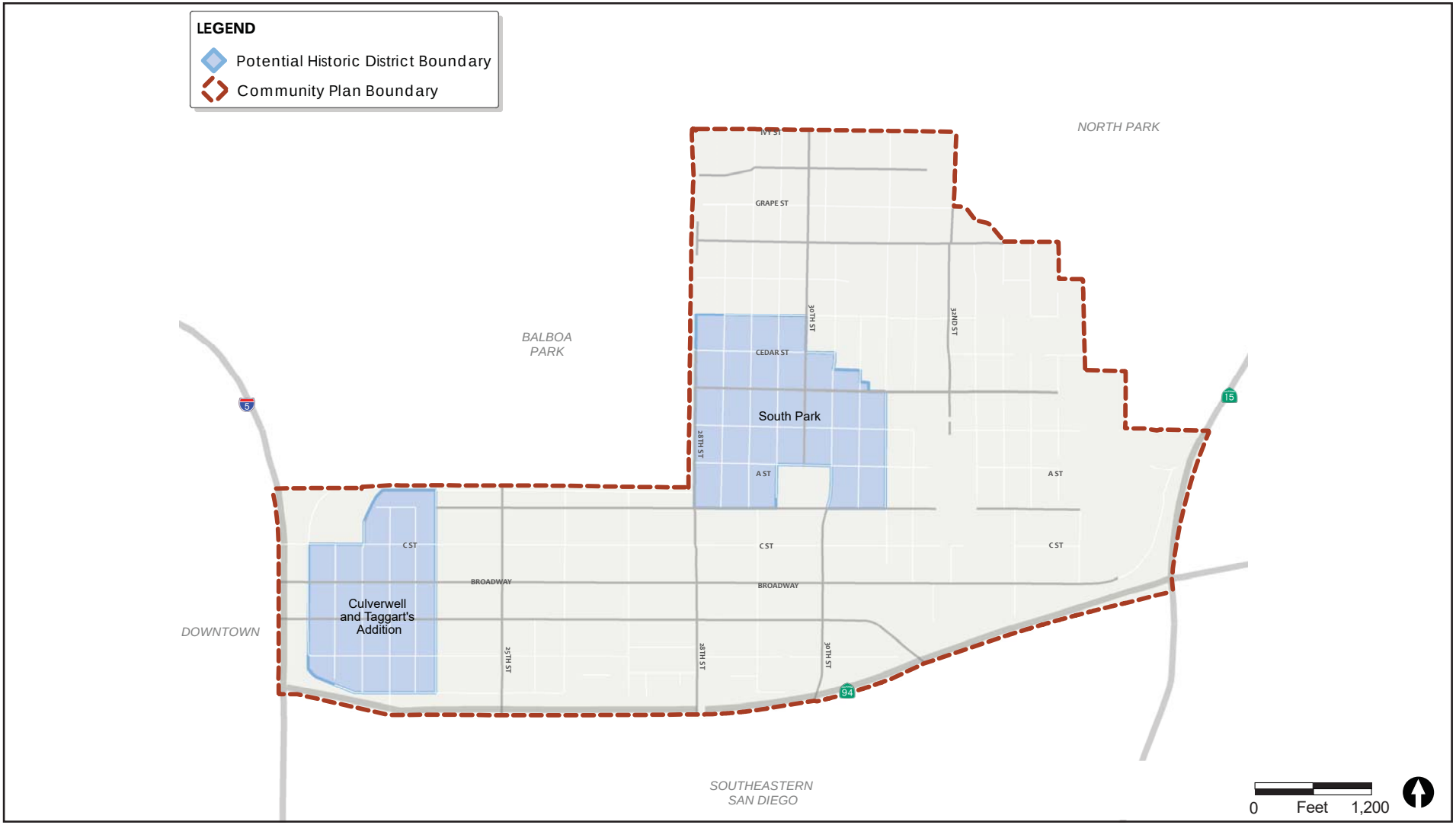


FIGURE 7.7-4

Location of Potential Historic Districts Identified by the Community – Golden Hill

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Although the proposed Golden Hill CPU and associated discretionary actions does not propose specific development, future development and related construction activities facilitated by the proposed Golden Hill CPU and associated discretionary actions at the project level could result in the alteration of a historic building, structure, object, or site. Direct impacts may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, sites and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance.

Impact 7.7-1 Implementation of the proposed Golden Hill CPU and associated discretionary actions could result in the alteration of a historic building, structure, object, or site.

~~Section 143.0212 of the SDMC also requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register. In these cases, this review is supplemented with a project specific records search of the NAHC Sacred Lands File and California OHP CHRIS data by qualified staff, and as stated above, a site specific archaeological survey would be required. For any subsequent projects implemented in accordance with the proposed Golden Hill CPU where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2., in accordance with Assembly Bill 52. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project and appropriate mitigation measures for direct impacts that cannot be avoided.~~

SDMC Section 143.0212 requires review of ministerial and discretionary permit applications impacting parcels containing buildings 45 years old or older to determine whether or not the project has the potential to adversely impact a resource which may be eligible for individual listing on the local register. When it is determined that a resource may exist and the project proposed would constitute a significant impact to that resource, a site specific survey is required and may be forwarded to the Historical Resources Board to consider designation and listing of the property. If designated, a Site Development Permit with deviation findings and mitigation would be required for any substantial modification of the resource. If the property were not designated, modification of the property would not be subject to the Historical Resources Regulations. Potential individual resources and resources identified as part of the MPL, which are evaluated as single resources independent of other buildings, would be protected to a large extent through SDMC Section 143.0212. However, because this regulation limits the evaluation of historic resources to the project parcel and individual eligibility, resources identified as potentially contributing to a potential historic district would not be protect unless they were also eligible individually.

The proposed Golden Hill CPU contains a Historic Preservation Element that supports the Historic Preservation Element of the General Plan through goals and policies for identifying and preserving historical, archaeological and tribal cultural resources, and educating citizens about the benefits of, and incentives for, historic preservation. Additional policies supporting the identification and

preservation of historical resources are also included in the Land Use, Urban Design, and Conservation Elements of the proposed Golden Hill CPU. Policies seek to preserve and enhance the historic character of the Golden Hill community and facilitate the identification, designation, and preservation of historically and culturally significant resources throughout the Golden Hill CPU area. Proposed policies also seek to preserve and rehabilitate historic and include measures to protect archaeological resources. Proposed policies would reduce direct impacts on historical and cultural resources by ensuring that such resources are identified and appropriately designated; encouraging preservation, rehabilitation, and adaptive reuse of historic structures instead of demolition or other significant alterations as part of future development; and protecting significant archaeological and tribal cultural resources.

The proposed Golden Hill CPU includes a policy that calls for the implementation of ~~interim protection measures~~supplemental development regulations to preserve the integrity and eligibility of potential historic districts, which are afforded very limited protection under existing regulations. In response to this policy, amendments to the Historical Resources Regulations are proposed to provide supplemental development regulations to address how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts. Development that does not comply with the supplemental development regulations would be subject to a Neighborhood Development Permit with deviation findings and mitigation. The amendments to the Historical Resources Regulations would be adopted concurrent with the proposed Golden Hill CPU.

While the Municipal Code does provide for the regulation and protection of designated and potential historical resources, and while amendment to the Historical Resources Regulations would be consistent with the policies of the Historic Preservation Element to provide additional protection for specified potential historic districts, it is impossible to ensure the successful preservation of all historic built environment resources within the plan area. Therefore, potential impacts to specified potential historic districts are considered significant and unavoidable.

Issue 2 Prehistoric Resources, Sacred Sites, and Human Remains

Would implementation of the proposed Golden Hill CPU and associated discretionary actions result in a substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or disturbance of any human remains, including those interred outside of formal cemeteries?

Although the proposed Golden Hill CPU and associated discretionary actions do not propose specific development at this time, future development and related construction activities facilitated by the proposed Golden Hill CPU and associated discretionary actions at the project level could result in the alteration or disturbance of prehistoric archaeological resources, tribal cultural resources, existing religious or sacred lands; or human remains. Grading, excavation, and other ground-disturbing activities associated with future development could affect important (as determined per the Historical Resources Guidelines) archaeological sites or traditional cultural properties that would constitute a significant direct impact.

The City has developed Historic Resource Sensitivity Maps that provide general locations of where historical resources are known to occur or have the potential to occur. These maps were developed

in coordination with technical experts and tribal representatives. Upon submittal of ministerial and/or discretionary permit applications, a parcel is reviewed against the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register (SDMC Section 143.0212).

~~The City's Historical Resources Regulations (Section 143.0212 of the SDMC) requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resource Sensitivity Maps specifically to determine whether or not the project has the potential to adversely impact an archaeological resource.~~ This review is supplemented with a project specific records search of the NAHC Sacred Lands File and California OHP CHRIS data by qualified staff. Additionally, a site specific archaeological survey would be required in accordance with Municipal Code requirements. For any subsequent projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52. Results of the consultation process would determine the nature and extent of any additional archaeological evaluation or changes to the proposed project and appropriate mitigation measures for direct impacts that cannot be avoided.

Avoiding impacts on religious or sacred places or human remains may be unavoidable in certain circumstances when resources are discovered during construction. Although there are no known religious or sacred uses within the Golden Hill CPU area, there is potential for these to be encountered during future construction activities associated with implementation of the proposed Golden Hill CPU and associated discretionary actions. The Prehistoric Cultural Resources Study identified 11 recorded archaeological sites and ten previous investigations conducted within the community of Golden Hill. As discussed above, under Section 7.7.2 Methodology, cultural sensitivity levels for the Golden Hill community planning area were rated low, moderate, or high based on the results of an archival records search. Since the majority of the community is developed and there is very little undeveloped land within the community planning area, with the exception of canyon areas, the cultural sensitivity for the entire community of Golden Hill is considered low. However, at the base of these canyons, especially leading into the Los Chollas Valley area, the cultural sensitivity rating is high as there is a potential for cultural resources to be present (Figure 7.7-5).

There are no known human remains interred outside of formal cemeteries. However, there are many areas within the City where previously unknown prehistoric human remains and prehistoric sites have been uncovered during both archaeological investigations and grading activities. State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project. In accordance with State law, these procedures would be followed in the event of accidental discovery of human remains. Specifically, as specified by California Health and Safety Code Section 7050.5, if human remains are found on a project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office by telephone. No further excavation or disturbance of

Map Source: SanGIS

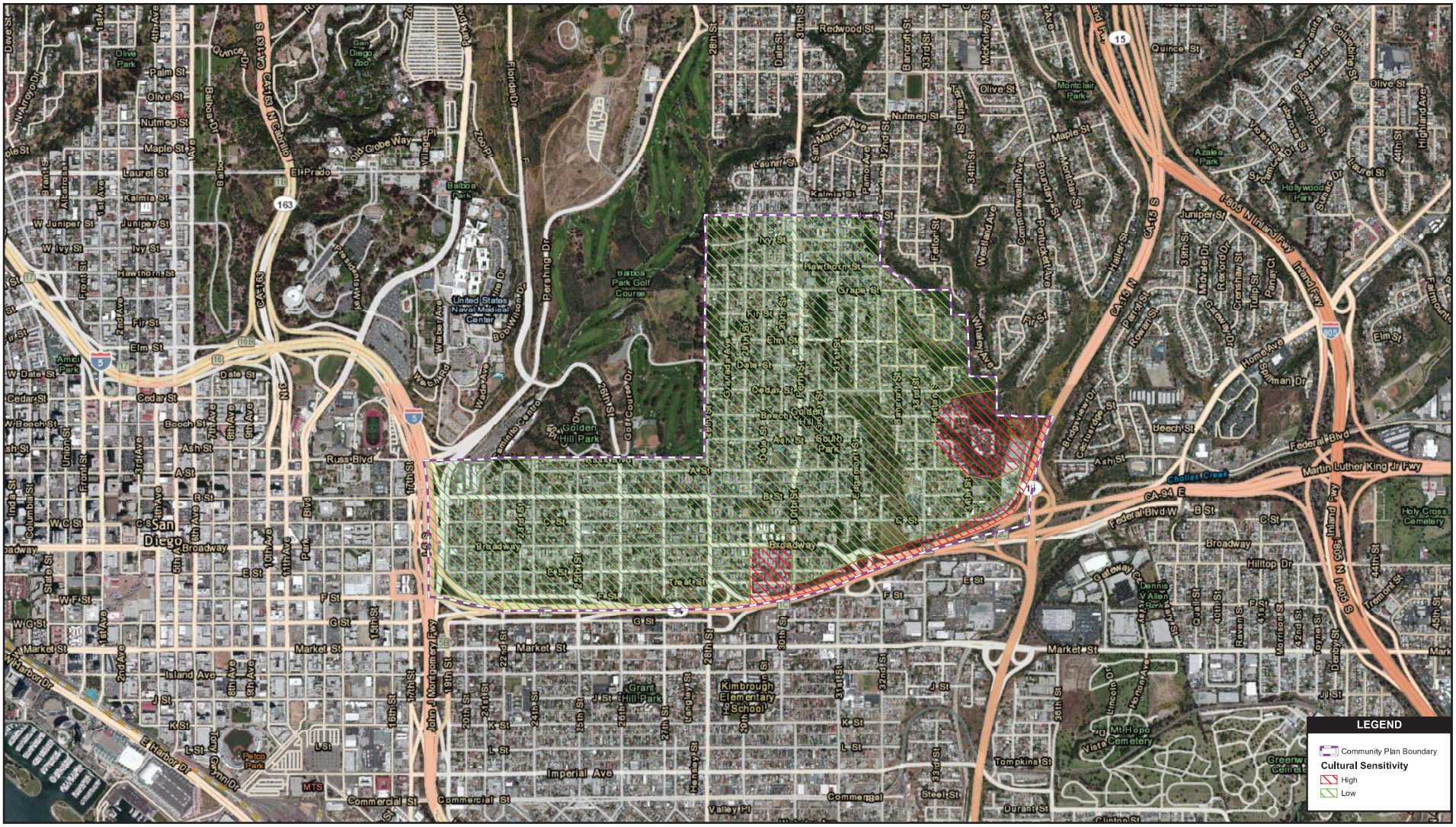


FIGURE 7.7-5
Cultural Sensitivity Areas – Golden Hill

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the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. However, the potential for encountering human remains during construction activities remains a possibility. Therefore, significant impacts on religious or sacred use sites or human remains may occur as a result of future development implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions.

The proposed Golden Hill CPU is designed to support the historic preservation goals of the City's General Plan, and contains policies requiring protection and preservation of significant archaeological resources in the Historic Preservation Element of the proposed Golden Hill CPU. Native American consultation early in the project review process is also included in the CPU to identify tribal cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines.

While existing regulations, the Municipal Code, and proposed Golden Hill CPU policies would provide for the regulation and protection of archaeological resources and human remains, it is impossible to ensure the successful preservation of all archaeological resources within the Golden Hill CPU area. Therefore, potential impacts to archaeological resources are considered significant.

Impact 6.7-2 Implementation of the proposed Golden Hill CPU and associated discretionary actions could adversely impact a prehistoric archaeological resource including religious or sacred use sites and human remains.

7.7.5 Significance of Impacts

Implementation of the proposed Golden Hill CPU and associated discretionary actions could result in an alteration to a historic building, structure, object, or site (Impact 7.7-1) and could adversely impact ~~existing~~ a prehistoric archaeological and tribal cultural resources including religious or sacred use sites ~~or~~and human remains, including those interred outside of formal cemeteries (Impact 7.7-1). These impacts are potentially significant.

7.7.6 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provide a regulatory framework for project-level historical resources evaluation/analysis criteria, and when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources—such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the subsequent project review process. The following mitigation measures (MM-HIST-1 and MM-HIST-2) provide a framework that would be required of future development projects with the potential to impact significant historical resources.

HIST-7.7-1 Historic Buildings, Structures, and Objects

Prior to issuance of any permit for a ~~future~~ development project implemented in accordance with the proposed Golden Hill CPU that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- Preparing a historic resource management plan;
- Adding new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource; and
- Shielding historic properties from noise generators through the use of sound walls, double glazing and air conditioning.

Specific types of historical resource reports, outlined in Section III of the Historic Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

To further increase protection of potential resources - specifically potential historic districts - the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation.

HIST 7.7-2 Archaeological and Tribal Cultural Resources

Prior to issuance of any permit for a ~~future~~ development project implemented in accordance with the proposed Golden Hill CPU that could directly affect an archaeological or tribal cultural resource, the City 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, but are not limited to, 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 prehistoric Native American activities.

Initial Determination

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeologicaly~~~~ Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City Guidelines must be performed by a qualified archaeologist.

Step 2:

Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Section 21080.3.1 and 21080.3.2., in accordance with Assembly Bill 52. It should be noted that during the consultation process, tribal representative(s) will be involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program shall be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. 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. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates 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.

Step 3:

Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable or project specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American tribal cultural resource~~Traditional Cultural Property~~ or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4:

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and tribal cultural resources containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5:

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards, unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial

related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act [U.S.C. 30014-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources area suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations, Part 79 ~~of the Federal Register~~. Additional information regarding curation is provided in Section II of the Guidelines.

7.7.7 Significance of Impacts after Mitigation

Issue 1 Historic Structures, Objects, or Sites

Future development implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions that would potentially result in impacts to significant historical resources would be required to incorporate feasible mitigation measures adopted in conjunction with certification of this PEIR as detailed in the mitigation framework MM-HIST-1. The proposed mitigation framework combined with the proposed Golden Hill CPU policies promoting the identification and preservation of historical resources in the Golden Hill CPU areas reduces the program-level impact related; to historic resources of the built environment but not to below a level of significance. Therefore, because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this time, the impact on historic resources of the built environment remains significant and unavoidable.

With respect to potential historic districts, while amendments to the Historical Resources Regulations to include supplemental development regulations are proposed, until such time as they are intensively surveyed, verified and brought forward for designation consistent with City regulations and procedures, potential impacts to the specified Potential Historic Districts remain significant and unavoidable.

Issue 2 Prehistoric Resources, Sacred Sites, and Human Remains

Future development implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions would potentially result in impacts on significant archaeological and tribal cultural resources, and therefore would be required to implement the mitigation framework described in measure HIST 7.7-2, which addresses archaeological and tribal cultural resources. This mitigation, combined with the policies of the General Plan and the proposed Golden Hill CPU promoting the identification, protection and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historical Resources Regulations (SDMC Section 143.0212) which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps would reduce the program-level impact related to prehistoric or historical archaeological resources and tribal cultural resources. However, even with application of the existing regulatory framework and mitigation framework, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, impacts to prehistoric resources, sacred sites, and human remains would be minimized, but not to below a level of significance.

7.8 Biological Resources

A Biological Resources Report for the Uptown, North Park, and Golden Hill Community Plan Updates (CPUs) was prepared by RECON (March 2, 2016). That analysis addresses biological impacts associated with the proposed Golden Hill CPU and associated discretionary actions. The entire report is included as Appendix H to this draft Program Environmental Impact Report (PEIR) and forms the basis for the discussion in this section.

7.8.1 Existing Conditions

The existing environmental setting including a description of the sensitive biological resources and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

A general description of vegetation communities, land cover types, and sensitive plant and wildlife species within the Golden Hill CPU area is described in Section 2.3.8. The specific vegetation communities/land cover types that occur within the Golden Hill community are shown in Figure 7.8-1. Table 7.8-1 lists acreages per vegetation community/land cover type.

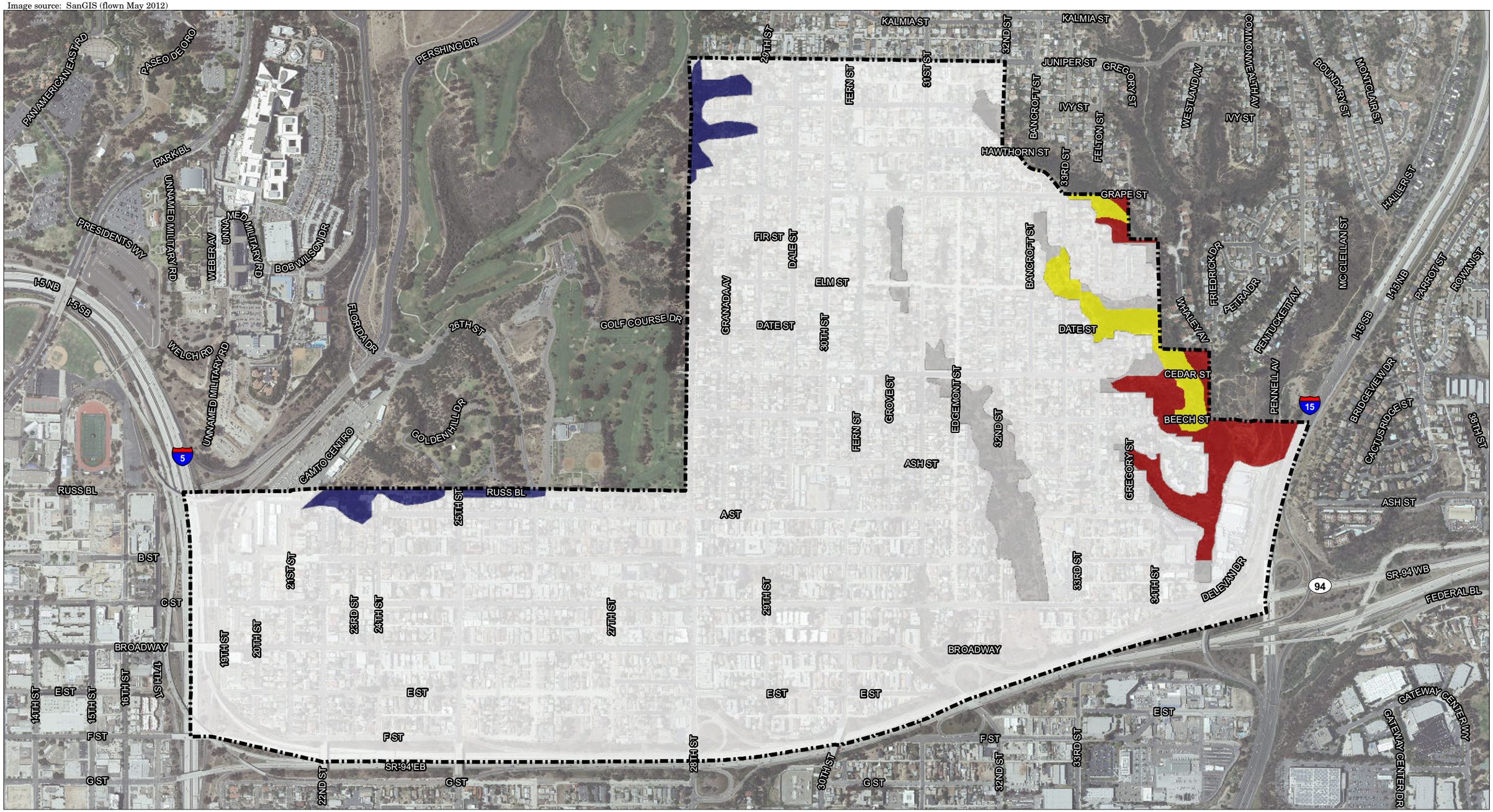
Table 7.8-1
Vegetation Communities and Land Cover Types – Golden Hill

Vegetation Community/ Land Cover Type	MSCP Tier	Acreage
Coastal Sage Scrub	II	19.0
Chaparral	III	10.5
Eucalyptus woodland	IV	10.0
Disturbed land	IV	22.7
Urban/developed	IV	683.3
TOTAL	--	745.5

MHPA *Boundary Line Corrections*

A comprehensive communitywide MHPA boundary line correction is associated with the Golden Hill CPU. The MHPA boundary line correction was considered in coordination with the Wildlife Agencies and is consistent with the goals of the Multiple Species Conservation Program (MSCP) to conserve biological resources and to exclude legally developed and required uses (i.e., structures, streets, brush management zone 1). As shown in Table 7.8-2, the comprehensive Multi-Habitat Planning Area (MHPA) boundary correction for the Golden Hill Community Plan area results in a net addition of 1.9 acres to the MHPA. However, this correction takes into account removing 3.4 acres of disturbed and developed land from the MHPA. With regards to actual vegetation communities

Image source: SanGIS (flown May 2012)



Golden Hill Community Plan Boundary

Existing Vegetation Communities and Land Cover Types

- Coastal Sage Scrub
- Chaparral
- Eucalyptus Woodland
- Disturbed Land
- Urban/Developed

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FIGURE 7.8-1

Existing Vegetation Communities and Land Cover Types – Golden Hill

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Table 7.8-2
Modifications to Vegetation Communities and Land Cover Types as a Result of the MHPA Boundary Line Correction – Golden Hill
(acres)

Vegetation Community/ Land Cover Type	Existing Acreage in MHPA	MHPA Addition	MHPA Deletion*	Change in MHPA	Total Acreage in MHPA
Coastal sage scrub	19.0	1.3	0.3	+1.0	20.0
Chaparral	10.5	2.5	0.1	+2.4	12.9
Eucalyptus Woodland	10.0	--	--	--	10.0
Disturbed land	22.7	1.3	0	+1.3	24.0
Developed	683.3	0	3.0	-3.0	680.3
TOTAL	745.5	5.1	3.4	+1.7	747.2

*Potential areas of brush management zone 1 which would occur over several individual private lots with each individual lot contributing less than 0.1-acre of habitat loss.

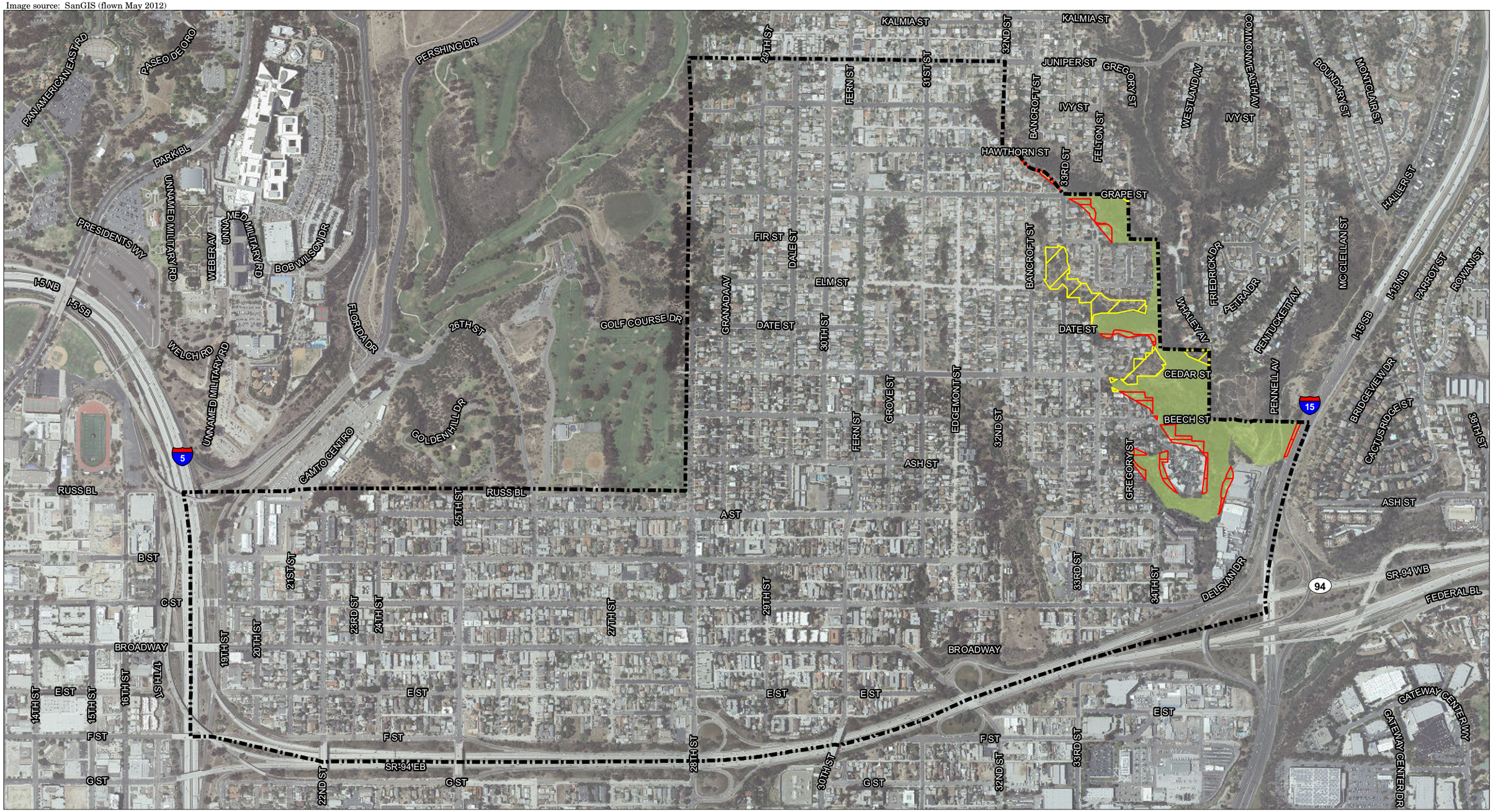
(coastal sage scrub and chaparral), the boundary correction results in a net addition of 3.8 acres to the MHPA, as well as 1.3 acres of disturbed land. Preservation of sensitive habitat is consistent with the goals of the MSCP, the Conservation Element for the Community Plan, and the City's Environmentally Sensitive Land (ESL) regulations. The MHPA correction removes existing development (i.e., structures and streets), as well as the 35-foot Brush Management Zone 1 area, as required in accordance with the City's Land Development Code, Section 142.0412.

As shown in Figure 7.8-2, a majority of the MHPA boundary line correction removed developed and disturbed land while adding sensitive habitats, which include coastal sage scrub, and chaparral,; and no change in grassland acreage in MHPA. City-owned lands within designated Community Plan open space areas adjacent to the existing MHPA have also been added to the MHPA. Additionally, the MHPA boundary was corrected by shifting the boundary to the rear portion of many private parcels thereby resulting in the removal of existing single-family homes and Brush Management Zone 1, while adding sensitive resources. In a few cases, sensitive habitat located within designated Community Plan open space on private land was added to the MHPA in order to expand the local wildlife corridor and increase the viability and connectivity of sensitive habitat within the existing MHPA. Regardless of the MHPA boundary line correction, these addition areas are regulated through ESL for sensitive biological resources and steep slopes. The MPHA boundary line correction does not add or increase any regulations associated with City projects, such as sewer line repairs within the canyons. These projects would continue to be conducted in accordance with the Canyon Sewer Cleaning Program (LDR No. 6020), Council Policies 400-13 and 400-14, and Community Plan policies related to this program. Correcting the MHPA boundary also does not relieve projects from having to otherwise comply with the City's MHPA Land Use Adjacency Guidelines, described below. The MHPA correction results in an overall benefit to the MHPA and is consistent with the goals and policies of the MSCP and the Golden Hill CPU.

7.8.1.1 Methodology

Data on vegetation, MHPA boundary corrections, and open space were obtained from data on file with the City of San Diego. The CPU boundaries are also maintained by the City of San Diego. Base data files were modified as noted below to correct data to match the existing condition.

Image source: SanGIS (flown May 2012)



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Golden Hill Community Plan Boundary

MHPA Existing

MHPA Delete

MHPA Add

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FIGURE 7.8-2

Location of MHPA Boundary Line Correction – Golden Hill

The analysis of biological resources for the Golden Hill CPU area was performed at the plan level using the existing base date files and other available data. Data from the California Natural Diversity Data Base (CNDDB) were used to provide information on potential sensitive plant and wildlife species occurrences. Additional geographic information system (GIS) data was used to provide more detailed information on areas of potential effect within the Golden Hill CPU area. This additional data included the location of individual private lots that helped identify areas where brush management could occur in the future.

a. Vegetation Communities

The base vegetation community mapping was taken primarily from the San Diego Association of Governments' (SANDAG) digital files for the MSCP. This vegetation mapping was updated using information from an aerial photograph of the area (SanGIS 2012).

Field work was conducted to verify the type of vegetation occurring in specific areas within the CPU boundaries where there were questions about the existing vegetation mapped. In particular, some individual lots identified as potentially having greater than one-tenth of an acre of native vegetation where corrections to the MHPA boundary are proposed were field checked.

Vegetation community classifications follow Holland (1986) and Oberbauer (1996). Assessments of the sensitivity of habitats are based primarily on the California Native Plant Society (CNPS), CNDDB, U.S. Fish and Wildlife Service (USFWS), and Holland.

b. Sensitive Plants

The locations of sensitive plant species evaluated are from the CNDDB. Nomenclature for plant species follows the Jepson Online Interchange and assessments of the sensitivity of species are based primarily on CNPS, State of California, City of San Diego, and USFWS.

c. Sensitive Wildlife

The locations of sensitive wildlife species evaluated are from the CNDDB. Zoological nomenclature for birds is in accordance with the American Ornithologists' Union Checklist and Unitt (2004); for mammals with Jones et al. (1997); for amphibians and reptiles with Crother et al. (2008); and for butterflies with Brown et al. (1992). Assessments of the sensitivity of species are based primarily on State of California and USFWS.

7.8.2 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (2011), which have been adapted to guide a programmatic analysis for the Golden Hill CPU and associated discretionary actions, impacts on biological resources would be significant if the project would result in:

1) A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS;

2) A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;

3) A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;

4) Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites; or

5) A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan or local policy protecting biological resources, either within the MSCP plan area or in the surrounding region.

7.8.3 Impact Analysis

Issue 1 Sensitive Wildlife Species

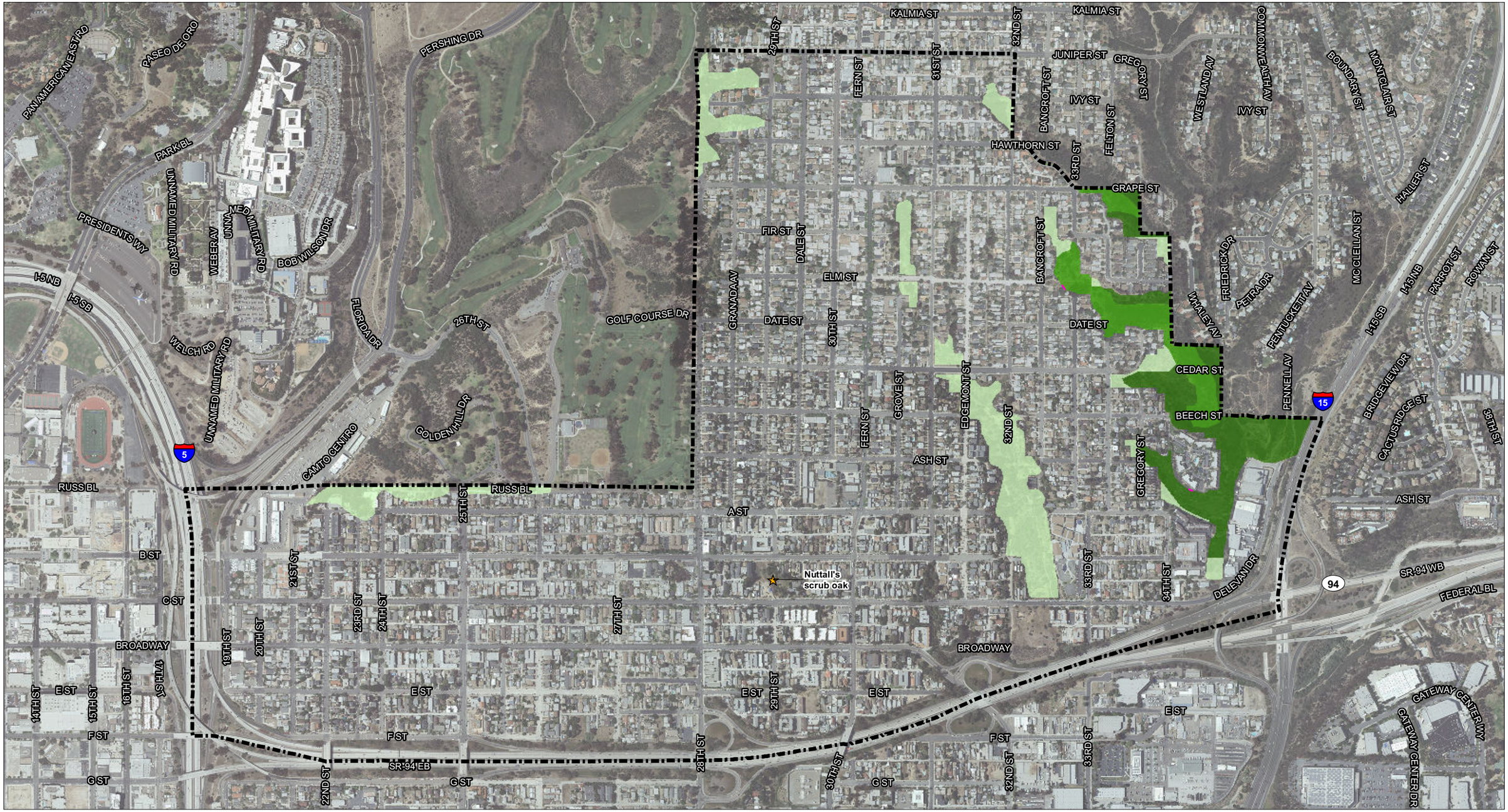
Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

No sensitive wildlife species are known to occur within the Golden Hill CPU area. Based on a review of the CNDDB database, no sensitive wildlife species have been identified within the Golden Hill CPU area as shown on Figure 7.8-3. There is a small potential that wildlife would be displaced and some small mammals, amphibians, and reptiles with low mobility may be inadvertently harmed during future project activities (e.g., Brush Management Zone 1 or re-development of a lot). However, any impacts to these wildlife species would be less than significant, as these common wildlife species are not considered sensitive by the City.

The proposed Golden Hill CPU and associated discretionary actions would not result in the direct modification of habitat as implementation would result in land use changes that would affect primarily developed areas. While site-specific sensitive wildlife species surveys were not completed consistent with a program-level analysis, it is anticipated that these species, if they occur, would be located within the canyon portions of the plan. Development would not occur within the canyon and habitat areas, which are currently designated Open Space and/or MHPA.

Additionally, the proposed Golden Hill CPU presents goals and policies for biological resources in the Conservation Element. The purpose of the Conservation Element is to provide for the long-term conservation and sustainable management of natural resources, recognizing they define the identity of the community, contribute to its economy, and improve its quality of life. Implementation of the Conservation Element policies and recommendations through development project review, infrastructure investment, and individual action is intended to conserve natural resources. Therefore, impacts to sensitive wildlife species associated with build-out of the proposed Golden Hill CPU and associated discretionary actions would be less than significant.

Image source: SanGIS (flown May 2012)



Golden Hill Community Plan Boundary

Sensitive Species (Source: CNDDB)

Potential Impact Area

Sensitive Vegetation Communities

Tier II

Tier IIIA

Tier IV

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FIGURE 7.8-3

Location of Sensitive Biological Resource Impacts – Golden Hill

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Issue 2 Sensitive Habitats

Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

a. Sensitive Vegetation Communities

As detailed in Chapter 2.0 Environmental Setting (Section 2.3.8), the Golden Hill CPU area has sensitive vegetation communities (Tier II – coastal sage scrub, Tier III – chaparral) primarily within the canyons and with some native upland habitat remnants along the canyon rims. The remainder of the Golden Hill CPU area is built out and supports very little sensitive vegetation communities. Implementation of the proposed Golden Hill CPU would impact primarily disturbed land and urban/developed land.

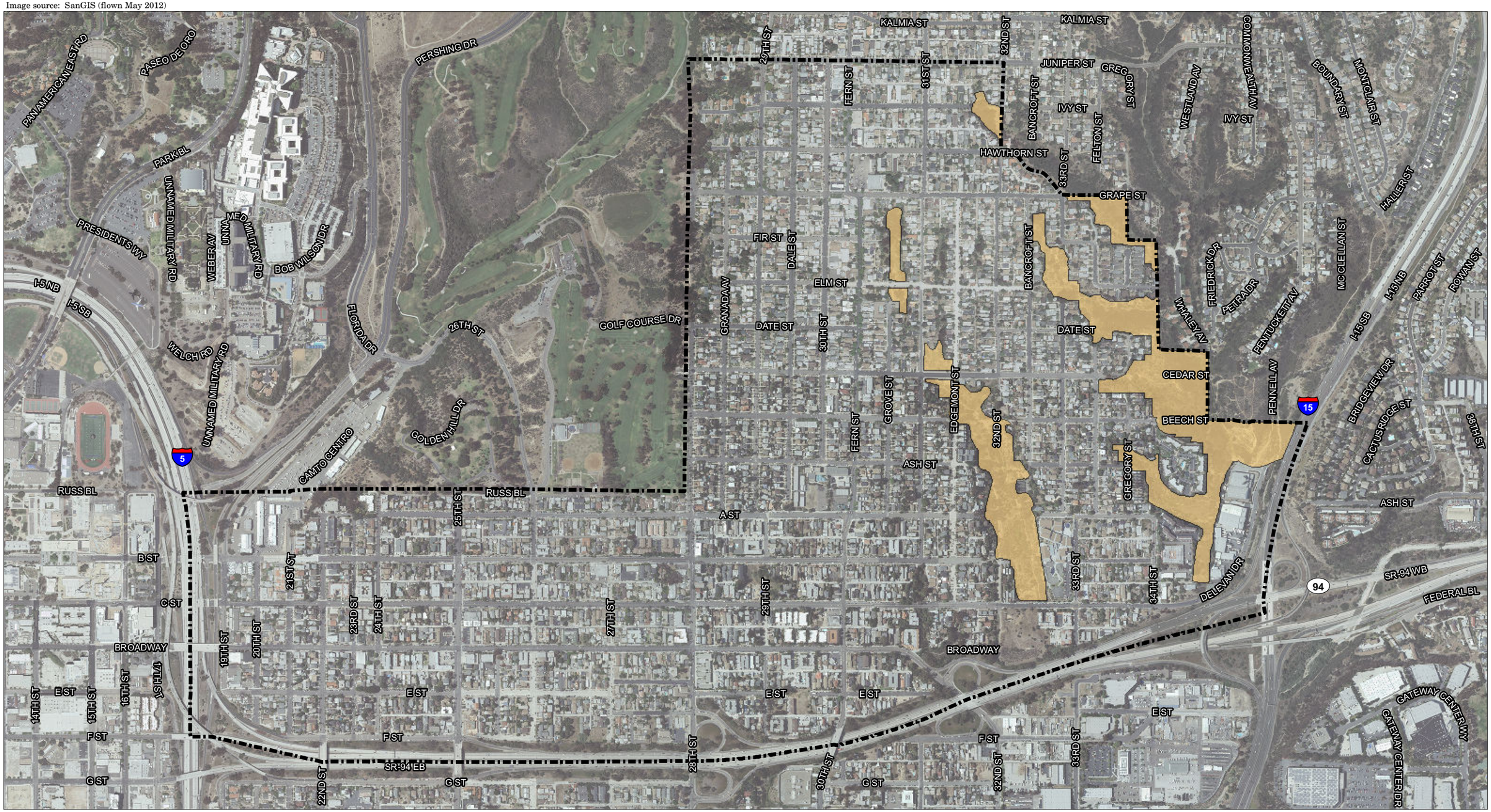
As part of the proposed Golden Hill CPU, areas designated as open space were reconfigured to remove areas of existing development to better correlate with the actual location of sensitive biological resources intended for conservation. The open space boundary was reconfigured consistent with the General Plan Land Use and Community Planning Element policies for designation of open space and the General Plan and Community Plan Conservation Element policies regarding the protection of natural habits and rare plants and animals. The locations of designated open space areas for the proposed Golden Hill CPU area are shown on Figure 7.8-4, and acreages summarized by habitat appear in Table 7.8-3.

Table 7.8-3
Proposed Open Space – Golden Hill

Vegetation Community / Land Cover Type	Open Space
Coastal Sage Scrub	19.0
Chaparral	10.5
Disturbed Land	22.5
TOTAL	52.0

Future build-out in accordance with the proposed Golden Hill CPU could impact a relatively small acreage of sensitive vegetation that is outside of the MHPA or designated open space that occurs along the edges of the canyons and within areas that could be subject to Brush Management Zone 1 clearing or re-development of a parcel or existing structures. Potential impacts to sensitive vegetation communities could include the loss of coastal sage scrub and chaparral habitat (see Figure 7.8-2). However, based on a review of the individual sites that could be subject to loss of sensitive vegetation communities, the potential impacts would occur over several individual private lots and impacts on any single lot would not exceed the 0.10-acre significance threshold contained in the City's significance guidelines. Furthermore, all projects with sensitive biological resources would require subsequent environmental review under the City of San Diego ESL regulations.

Image source: SanGIS (flown May 2012)



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Golden Hill Community Plan Boundary

Proposed Open Space

FIGURE 7.8-4

Location of Open Space – Golden Hill

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The potential for very minor losses of habitat located at the edges of existing developed areas would not adversely affect the regional distribution of affected vegetation communities. Implementation of the proposed Golden Hill CPU policies and future compliance with established development standards contained in the City's ESL Regulations and Biology Guidelines as well as the MSCP Subarea Plan and Land Use Adjacency Guidelines would ensure that biological resource impacts remain below a level of significance.

b. Sensitive Plants

Implementation of the proposed Golden Hill CPU has the low potential to impact the one sensitive plant species, Nuttall's scrub oak, previously recorded in the Golden Hill CPU area (see Figure 7.8-2). Nuttall's scrub oak can occur within the coastal sage scrub and chaparral vegetation. It is not a covered species in the MSCP, but is considered rare and has a CNPS Rare Plant Ranking of 1B.1. As described previously, implementation of the proposed Golden Hill CPU would result in land use changes that would affect primarily developed areas. The potential is low for sensitive plant species to occur in areas with potential for development due to the extent of urbanization that has taken place within the Golden Hill CPU area and along the urban-canyon interface. Though focused surveys for sensitive plant species were not conducted in support of this document, it is anticipated that these species, if they occur, would be located within the canyon portions of the Community Plan.

As described previously, future build-out of the proposed Golden Hill CPU could impact a relatively small acreage of sensitive vegetation that is outside of the MHPA or designated open space that occurs along the edges of the canyons and within areas that could be subject to Brush Management Zone 1 clearing or re-development of a parcel or existing structures. These areas potentially support very small areas of native habitat (less than 0.1 acre per lot) with a low potential for sensitive plant species to occur. According to the City's Significance Determination Thresholds, impacts to less than 0.1 acre of native habitat are not considered significant and would not require mitigation. Furthermore, because the area is already highly developed, it is anticipated that only small populations of sensitive plants, if any, would remain after implementation, and therefore implementation of the proposed Golden Hill CPU and associated discretionary actions are not expected to significantly impact the regional population of sensitive plant species. Impacts to sensitive plants would be less than significant.

Issue 3 Wetlands

Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

No wetland habitats have been identified within the Golden Hill CPU area. Thus, future development in accordance with the proposed Golden Hill CPU and associated discretionary actions would result in less than significant impact to jurisdictional waters or wetlands.

Issue 4 Wildlife Corridors and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Within the Golden Hill CPU area, canyons provide for local wildlife movement for birds and small mammals. However, these canyons are isolated by development and are not part of a major wildlife corridor system. Nonetheless, the canyons serve as a stepping-stone for wildlife species movement between other local canyon systems and into major off-site habitat areas. The proposed Golden Hill CPU would designate canyon areas as open space which would provide protections from future development. The MHPA designation for canyon areas further protects canyon areas from development. The project includes MHPA boundary line corrections to add habitat to the MHPA areas and remove developed areas from the MHPA as described below under Issue 5. These changes would increase the amount of protected open space in canyons, which would be beneficial for wildlife movement in canyon areas. Thus, no impact to wildlife corridors would occur.

Implementation of future projects consistent with the proposed Golden Hill CPU and associated discretionary actions has the potential to result in direct impacts to migratory or nesting birds. As discussed in Chapter 2.0, Section 2.3.8.4 of this PEIR, there is low potential for occurrence of sensitive bird species. However, where future development areas contain trees or are located adjacent to trees that could serve as nesting habitat for migratory birds, there is a potential for adverse impacts to wildlife nursery sites if construction occurs during the typical bird breeding season (February 1 to September 15).

The Migratory Bird Treaty Act (MBTA), which is enforced by the USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation. Thus, there is an existing regulatory framework in place to prevent adverse impacts to migratory birds. Additionally, future discretionary development occurring within the CPU area that has the potential to impact migratory birds would be required to conduct pre-construction surveys if construction occurs during the typical bird breeding season to determine the presence or absence of breeding birds and ensure that no impacts occur to any nesting birds or their eggs, chicks, or nests. Within the Golden Hill CPU areas, development adjacent to the MHPA would be subject to additional protections that would avoid impacts to wildlife nursery sites in adjacent habitat areas as detailed further under Issue 5 below. Thus, with the existing regulatory framework in place, potential impacts to wildlife nursery sites would be less than significant.

Issue 5 Multiple Species Conservation Program

Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, or local policy protecting biological resources, either within the MSCP plan area or in the surrounding region?

A comprehensive community-wide MHPA boundary line correction is associated with the proposed Golden Hill CPU. The MHPA boundary line correction was considered in coordination with the Wildlife Agencies and is consistent with the goals of the MSCP to conserve biological resources and

to exclude legally developed and required uses (i.e., structures, streets, brush management zone 1). As shown in Table 7.8-2, the comprehensive MHPA boundary correction for the Golden Hill CPU area results in a net addition of 1.7 acres to the MHPA. Preservation of sensitive habitat is consistent with the goals of the MSCP, the Conservation Element for the proposed Golden Hill CPU, and the City's ESL regulations. The MHPA correction would remove existing development (i.e., structures and streets), as well as the 35-foot Brush Management Zone 1 area, as required in accordance with the City's Land Development Code, Section 142.0412.

As shown in Figure 7.8-2, a majority of the MHPA boundary line correction would remove developed and disturbed land while adding sensitive habitats, which include coastal sage scrub and chaparral. There would be no change in eucalyptus woodland acreage in the MHPA. City-owned lands within designated Community Plan open space areas, of the adopted Community Plan, adjacent to the existing MHPA have also been added to the MHPA. Additionally, the MHPA boundary was corrected by shifting the boundary to the rear portion of many private parcels thereby resulting in the removal of existing single-family homes and Brush Management Zone 1, while adding sensitive resources. In a few cases, sensitive habitat located within adopted designated Community Plan open space on private land was added to the MHPA in order to expand the local wildlife corridor and increase the viability and connectivity of sensitive habitat within the existing MHPA. Regardless of the MHPA boundary line correction, these addition areas are regulated through ESL for sensitive biological resources and steep slopes. The MPHA boundary line correction does not add or increase any regulations associated with City projects, such as sewer line repairs within the canyons. These projects would continue to be conducted in accordance with the Canyon Sewer Cleaning Program (LDR No. 6020), Council Policies 400-13 and 400-14, and Community Plan policies related to this program. Correcting the MHPA boundary also does not relieve projects from having to otherwise comply with the City's MHPA Land Use Adjacency Guidelines, described below.

As designated in the City's MSCP Subarea Plan, the MHPA is the permanent preserve area for habitat conservation. There are no remaining lands completely within the MHPA that have not already been preserved as open space within this Golden Hill CPU area. All projects with sensitive biological resources would require subsequent environmental review under the City's ESL regulations.

Development adjacent to MHPA lands would be subject to the City's MHPA Land Use Adjacency Guidelines which address indirect effects on the MHPA from adjacent development. Indirect effects can occur wherever development and human activity is adjacent to natural areas. These effects include those due to increased runoff, trampling, and removal of plant cover due to hiking, biking and other human activities, increased presence of toxins, increased nighttime light levels, and redirection or blockage of wildlife movement, increased levels of non-native and invasive plants. These indirect effects could reduce the quality of the MHPA. The City's MHPA Land Use Adjacency Guidelines require certain measures to be incorporated in the design of projects adjacent to the MHPA to reduce indirect impacts to less than significant.

Future development proposals located adjacent to the MHPA would be required to address potential indirect impacts and incorporate the City's MHPA Land Use Adjacency Guidelines. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines. The City's Land Use Adjacency Guidelines address requirements for grading and land development; drainage; toxic substances in runoff; lighting; barriers; invasive plant species; brush management requirements; and noise. Furthermore, proposed policies in the Conservation Element of the North Park CPU

would support existing protections for MHPA lands. Thus, implementation of the proposed North Park CPU and associated discretionary actions would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan or local policy protecting biological resources and impacts would be less than significant.

Cumulative Impacts

Preservation of the region's biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City of San Diego are managed through the adopted MSCP Subarea Plan which is incorporated by reference in the City's adopted General Plan.

As discussed above, the Golden Hill CPU area currently supports a number of sensitive resources including coastal sage scrub, chaparral, and grassland. However, these resources are located in canyon areas that are protected through the proposed open space designation and/or their location within MHPA, in addition to protections provided by the City's ESL regulations. The proposed Golden Hill CPU also incorporates several policies related to the protection of biological resources. These focus primarily on the CPU's consistency with the City's ESL Regulations, the Biology Guidelines, and MSCP Subarea Plan Management Policies to protect the area's sensitive plants and animals.

Cumulative development that would occur within the Golden Hill CPU area combined with development within surrounding communities including the North Park and Uptown CPU areas would result in less than significant cumulative impacts to biological resources due to the developed nature of these communities combined with the existing regulatory framework that would ensure impacts to sensitive biological resources are avoided. Although each individual future project may contribute to incremental biological resource impacts, compliance with adopted CPU policies, the MSCP Subarea Plan, ESL Regulations, and the Biology Guidelines would ensure that cumulative impacts from future development would be less than significant.

7.8.4 Significance of Impacts

Issue 1 Sensitive Wildlife Species

No sensitive wildlife species are known to occur within the Golden Hill CPU area. Additionally, if sensitive species were identified within the CPU area, they are most likely to occur within the canyon areas which are currently designated Open Space and/or MHPA and would not be subject to development. As a result, those areas likely to support habitat for sensitive wildlife species would be conserved. Indirect impacts to sensitive wildlife species would be implemented through the City's Land Use Adjacency Guidelines of the City's MSCP. Thus, impacts to sensitive wildlife species resulting from build-out the proposed Golden Hill CPU and associated discretionary actions would be less than significant.

Issue 2 Sensitive Habitats

Implementation of the proposed Golden Hill CPU and associated discretionary actions have a low potential to impact any of the sensitive plant species previously recorded in the Golden Hill

community due to the location of these vegetation communities within protected canyon areas. Build-out of the proposed Golden Hill CPU and associated discretionary actions would result in land use changes that would affect primarily developed areas. The potential for sensitive plant species to still occur is low due to the extent of development that has taken place within the Golden Hill CPU area and along the urban-canyon interface. Though focused surveys for sensitive plant species were not conducted in support of this document, it is anticipated that these species, if they occur, would be located within the canyon portions of the Golden Hill CPU area. Thus, impacts to sensitive vegetation communities and plant species due to implementation of the Golden Hill CPU and associated discretionary actions would be less than significant and no mitigation would be required.

Issue 3 Wetlands

No wetland habitats have been identified within the Golden Hill CPU area. Thus, impacts to wetlands would be less than significant and no mitigation would be required.

Issue 4 Wildlife Corridors and Nursery Sites

Impacts to wildlife movement corridors and wildlife nursery sites would be less than significant with the application of the existing regulatory framework that protects the remaining habitat located within canyon areas. These remaining habitat areas are protected through the proposed open space designation, their location within the MHPA, in addition to ESL regulations. Additionally, nesting birds are protected through Federal protections of the MBTA. Thus, impacts related to wildlife corridors and nursery sites would be less than significant.

Issue 5 Multiple Species Conservation Program

The proposed Golden Hill CPU and associated discretionary actions would be consistent with the MHPA Land Use Adjacency Guidelines and Municipal Code (Section 142.0740) requirements relative to lighting adjacent to the MHPA. Additionally, in complying with the MHPA Land Use Adjacency Guidelines requirements, landscape plans for future projects would be required to ensure that grading would not impact environmentally sensitive lands, potential runoff would not drain into MHPA land, toxic materials used on developments do not impact adjacent sensitive land, development includes barriers that would reduce predation by domestic animals, and landscaping does not contain exotic plants/invasive species. In addition, the MHPA Land Use Adjacency Guidelines direct development so that any brush management activities are minimized within the MHPA, and contains requirements to reduce potential noise impacts to listed avian species. Compliance with the City's MHPA Land Use Adjacency Guidelines and adherence to the policies in the Conservation Element of the Golden Hill CPU would reduce potential impacts of the proposed CPU to less than significant.

Additionally, the proposed MHPA boundary line correction would be consistent with the goals of the MSCP to conserve biological resources and to exclude legally developed and required uses open space, MHPA and developed areas. Thus, the proposed Golden Hill CPU and associated discretionary actions would not result in any conflicts with the City's MSCP.

7.8.5 Mitigation Measures

All biological resources impacts would be less than significant; thus, no mitigation measures are required.

7.9 Geologic Conditions

GEOCON Inc. prepared Program EIR-level Geotechnical Report – Uptown, North Park, and Golden Hill Planning Areas (June 10, 2015; Appendix I). That analysis addresses geotechnical impacts associated with the three proposed Community Plan Updates (CPUs) including the proposed Golden Hill CPU and associated discretionary actions. The Geotechnical Report is included in Appendix I to this EIR. This section presents a summary of the findings made in the report and the associated analysis of potential impacts.

7.9.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively.

The Golden Hill CPU area is generally a flat mesa incised by steep-sided canyons that drain into the San Diego Bay basin. Overall, the Golden Hill CPU area consists primarily of developed areas consisting of residential and commercial projects. Undeveloped areas are generally located in the canyons and support coastal sage scrub, eucalyptus woodlands, and chaparral.

Soil and geologic conditions are described in detail in Section 2.3.5. In summary the area of the Golden Hill CPU area is underlain by four surficial soil deposits and three geologic formations. The surficial soils include artificial fill (unmapped), topsoil/colluvium, alluvium (unmapped), and very old terrace deposits (formerly Lindavista Formation). The geologic formations include San Diego Formation, Pomerado Conglomerate, and Mission Valley Formation. Figure 7.9-1 illustrates the location of the geologic formations located within Golden Hill.

7.9.1.1 Groundwater

Near surface groundwater (less than 20 feet deep) is unlikely in geologic formations within the Golden Hill community. Subsurface water may be present at depth in alluvial soils deposited in canyon drainage channels.

7.9.1.2 Geologic Hazards

a. Geologic Hazard Category

Review of the 2008 City of San Diego Seismic Safety Study, Geologic Hazards and Faults, indicates the majority of the Golden Hill CPU area is mapped as Geologic Hazard Category (GHC) 52, which is “other level areas, gently sloping to steep terrain, favorable geologic structure, low risk”. A small area

Map Source: GEOCON

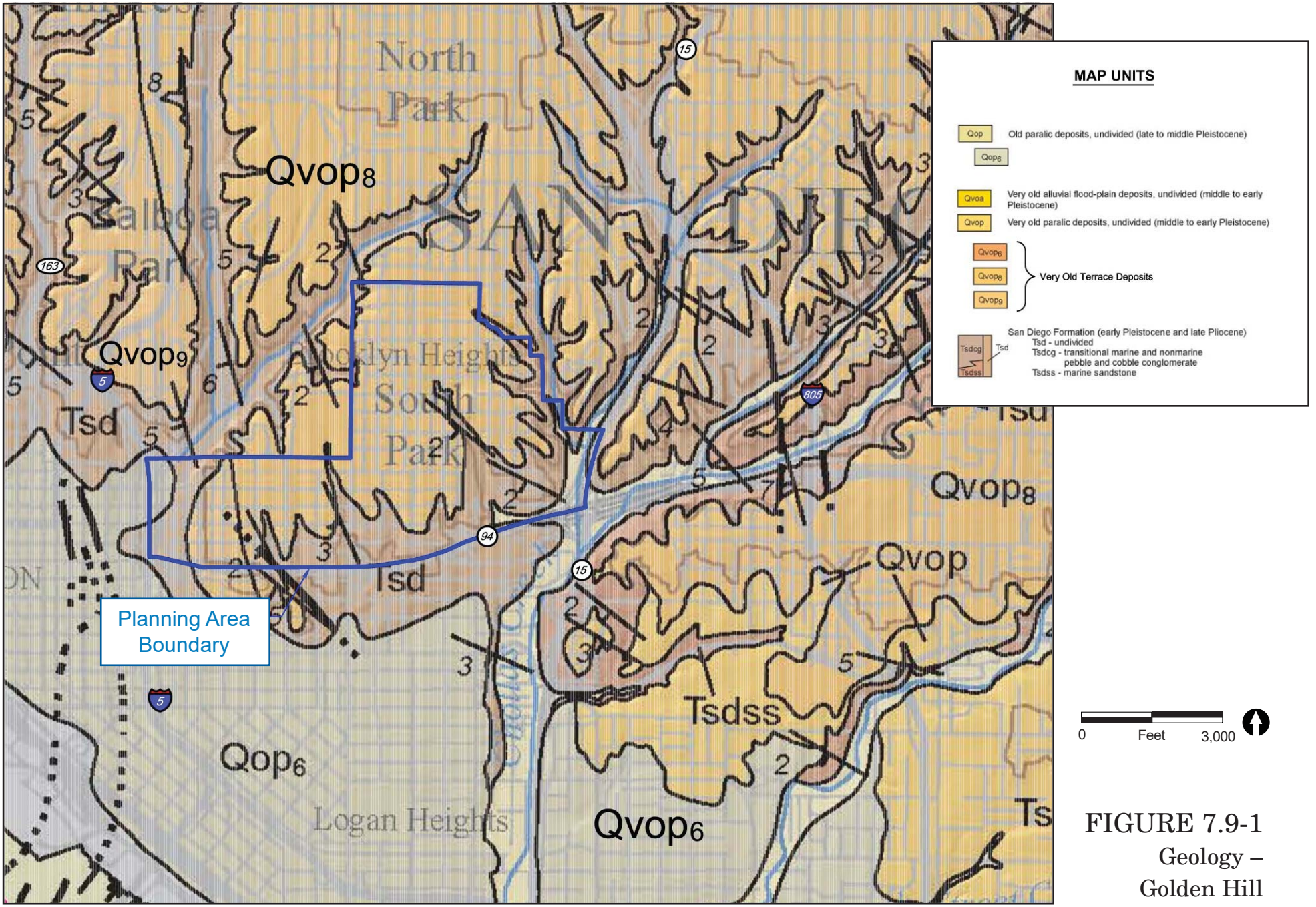


FIGURE 7.9-1
Geology –
Golden Hill

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at the southeast corner adjacent to Interstate 15 is mapped as GHC 32, "low potential for liquefaction, fluctuating groundwater, minor drainages". The southwest part of the Golden Hill CPU area is mapped within the downtown special fault zone, GHC 13. Fault buffer zones, designated GHC 12, are present in the CPU area. These zones encompass faults that are considered to be potentially active, inactive, presumed inactive, or activity unknown. Figure 7.9-2 shows the Greater Golden Hill Community Plan boundary superimposed on the 2008 City of San Diego Seismic Safety Study map.

b. Faulting

Review of published geologic literature indicates the Golden Hill Community Plan area is traversed by two, north/south trending faults, the Florida Canyon Fault and the Texas Street Fault (see Figure 7.9-2.) These faults are normal faults, it is likely that these faults are right-lateral, strike-slip faults related to the Rose Canyon Fault Zone.

The nearest known active fault is the Rose Canyon Fault Zone, which is identified in the GEOCON report as separate from the Newport-Inglewood/Rose Canyon Connected Fault, which is located approximately two miles to the west of the Golden Hill CPU area. Major earthquakes occurring on the Rose Canyon Fault Zone, or other regional active faults located in the southern California area, could subject the affected area to moderate to severe ground shaking.

Seismic hazard reduction with respect to faulting and seismicity is typically attained by building set-backs from active faults and proper implementation of existing building codes. Recommendations specific to future development would occur as part of site specific geotechnical investigations, if required during City staff review.

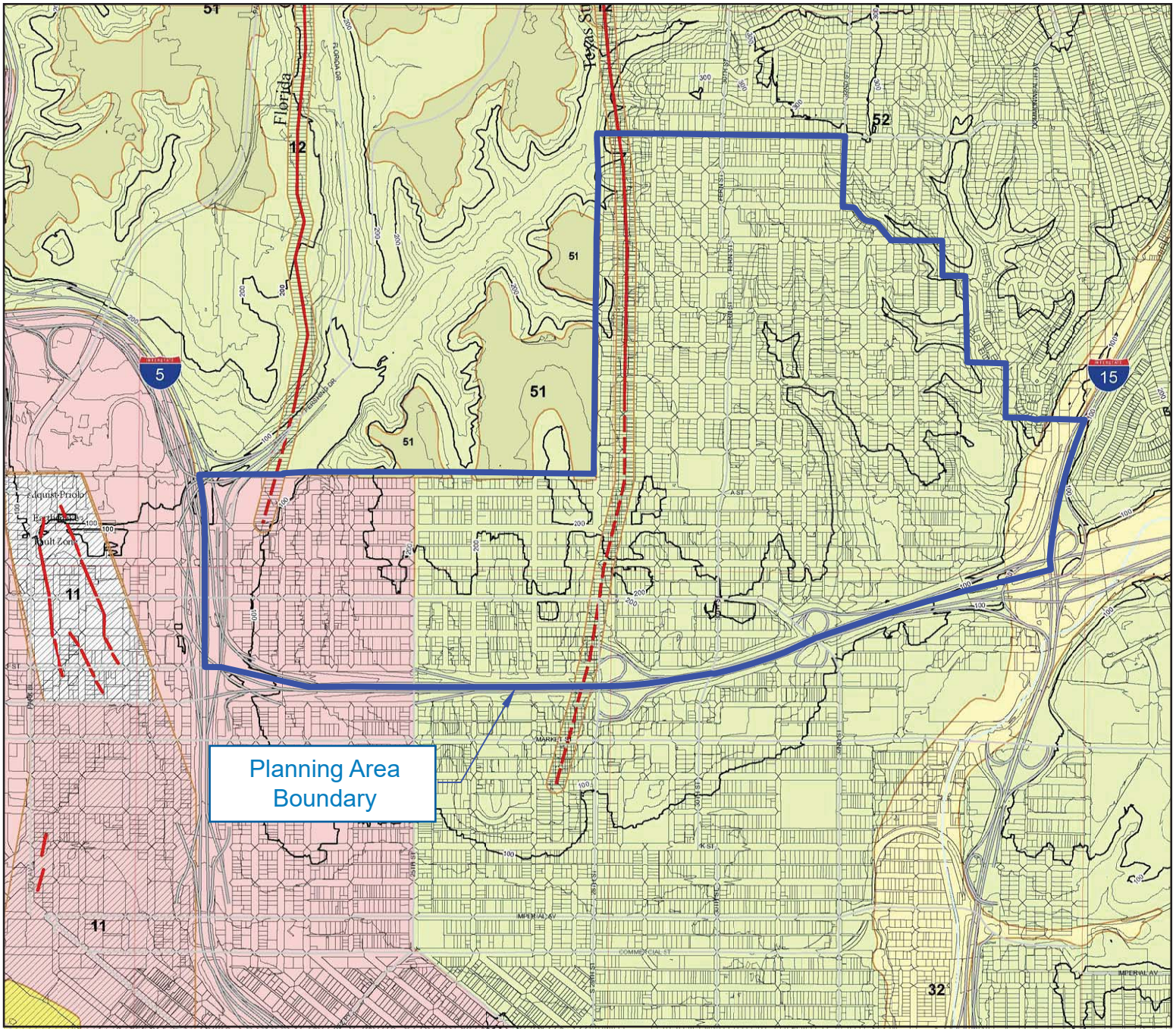
c. Seismicity

The Golden Hill CPU area will be subjected to hazards caused by ground shaking during seismic events on regional active faults. Figure 7.9-3 shows the locations of known active faults within the immediate vicinity of the community.

According to the computer program EZ-FRISK (Version 7.62), six known active faults are located within a search radius of 50 miles from the CPU area. The nearest known active fault is the Rose Canyon Fault Zone otherwise known as the Newport-Inglewood/Rose Canyon Connected Fault, located approximately two miles west of the site and is the dominant source of potential ground motion. Table 7.9-1 lists the estimated maximum earthquake magnitude and peak ground acceleration for faults in relationship to the Golden Hill CPU area location.

As part of the geotechnical update, it was determined that the CPU area could be subject to moderate to severe ground shaking in the event of an earthquake along any of the faults listed in Table 7.9-1 or other faults in the Southern California/Northern Baja California region.

Map Source: GEOCON



LEGEND

Geologic Hazard Categories

FAULT ZONES

- 11 Active, Alquist-Priolo Earthquake Fault Zone
- 12 Potentially Active, Inactive, Presumed Inactive, or Activity Unknown
- 13 Downtown special fault zone

LIQUEFACTION

- 31 High Potential -- shallow groundwater major drainages, hydraulic fills
- 32 Low Potential -- fluctuating groundwater minor drainages

OTHER TERRAIN

- 51 Level mesas -- underlain by terrace deposits and bedrock nominal risk
- 52 Other level areas, gently sloping to steep terrain, favorable geologic structure, Low risk
- 53 Level or sloping terrain, unfavorable geologic structure, Low to moderate risk
- 54 Steeply sloping terrain, unfavorable or fault controlled geologic structure, Moderate risk
- 55 Modified terrain (graded sites) Nominal risk

Water (Bays and Lakes)

FAULTS

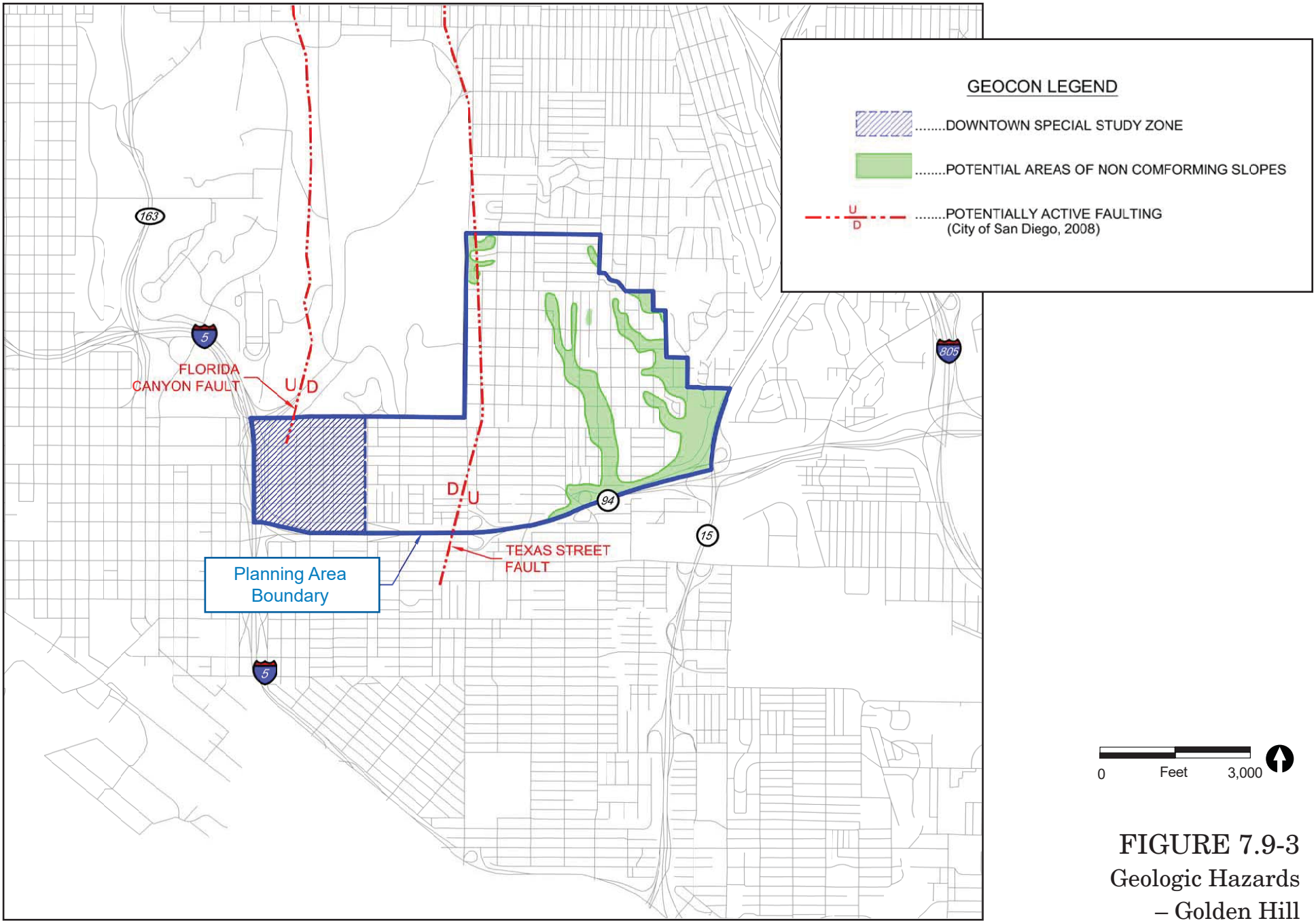
- Fault
- Inferred Fault
- Concealed Fault
- Shear Zone

0 Feet 1,800

FIGURE 7.9-2
City of San Diego
Geologic Hazards
and Fault Map
– Golden Hill

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Map Source: GEOCON



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FIGURE 7.9-3
Geologic Hazards
– Golden Hill

Table 7.9-1 Deterministic Seismic Hazard Parameters – Golden Hill					
			Peak Ground Acceleration		
Fault Name	Distance from Site (miles)	Maximum Earthquake Magnitude (Mw)	Boore-Atkinson 2008 (g)	Campbell-Bozorgnia 2008 (g)	Chiou-Youngs 2008 (g)
Newport-Inglewood/Rose Canyon Connected	2	7.5	0.42	0.39	0.50
Rose Canyon	2	6.9	0.39	0.38	0.46
Coronado Bank	14	7.4	0.23	0.17	0.21
Palos Verde/Coronado Bank Connected	14	7.7	0.25	0.18	0.24
Elsinore	40	7.85	0.14	0.09	0.12
Earthquake Valley	45	6.8	0.08	0.06	0.05

The computer program EZ-FRISK was used to perform a probabilistic seismic hazard analysis, which assumes that the occurrence rate of earthquakes on each mapped Quaternary fault is proportional to the faults slip rate. The program accounts for earthquake magnitude as a function of fault length, and site acceleration estimates are made using the earthquake magnitude and distance from the site to the rupture zone. The program also accounts for uncertainty in each of following: (1) earthquake magnitude, (2) rupture length for a given magnitude, (3) location of the rupture zone, (4) maximum possible magnitude of a given earthquake, and (5) acceleration at the site from a given earthquake along each fault. By calculating the expected accelerations from considered earthquake sources, the program calculates the total average annual expected number of occurrences of site acceleration greater than a specified value. Table 7.9-2 presents the site-specific probabilistic seismic hazard parameters including acceleration-attenuation relationships and the probability of exceedance.

Table 7.9-2 Probabilistic Seismic Hazard Parameters – Golden Hill			
	Peak Ground Acceleration		
Probability of Exceedance	*Boore-Atkinson 2008 (g)*	*Campbell-Bozorgnia 2008 (g)*	*Chiou-Youngs 2008 (g)*
2% in a 50-Year Period	0.54	0.48	0.58
5% in a 50-Year Period	0.37	0.33	0.39
10% in a 50-Year Period	0.26	0.23	0.26

While listing peak accelerations is useful for comparison of potential effects of fault activity in a region, other considerations are important in seismic design, including frequency and duration of motion and soil conditions underlying the site.

d. Liquefaction Potential

Liquefaction or seismically- induced settlement typically occurs when a site is located in a zone with seismic activity, onsite soils which are relatively cohesionless with relative densities less than about 70 percent, and groundwater within 50 feet of the surface. If these criteria are met, a seismic event could result in soil liquefaction. One area of potentially liquefiable soils has been identified on the City of San Diego Hazard Map at the southeast corner of the CPU area along the west side of Interstate 15 (see Figure 7.9-2). The area is identified as Hazard Map Symbol 32, Low Potential – fluctuating groundwater, minor drainages. Impacts related to liquefaction include ground failure, settlement, or lateral spreading. The potential for liquefaction and seismically-induced settlement occurring for the Golden Hill Community Plan area is low across the majority of the area due to the very dense cemented condition of the geologic formations and lack of groundwater.

e. Subsidence

Based on the subsurface soil conditions encountered during the field investigation and the lack of groundwater extraction, the risk associated with ground subsidence hazard is low.

f. Non-Conforming Slopes

Areas of known and potential, non-conforming slopes (i.e., slopes steeper than 2:1 horizontal to vertical) are shown on Figure 7.9-3. These areas are generally located at or near the southeast corner of the of the Golden Hill CPU area.

g. Landslides

No large landslides are mapped within the Golden Hill Community Plan area; however, small surficial instability could be present on steep drainage slopes. Areas of known and potential, over-steepened, natural and constructed slopes, where surficial instability could occur, are shown on Figure 7.9-3.

h. Expansive Soils

There are no expansive soils in the Golden Hill CPU area.

7.9.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2011). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed Golden Hill CPU. For impacts related to geologic conditions, a significant impact could occur if implementation of the proposed Golden Hill CPU and associated discretionary actions would:

1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

   - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
   - Strong seismic ground shaking.
   - Seismic-related ground failure, including liquefaction.
   - Landslides.

2) Result in substantial soil erosion or the loss of topsoil.

3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

4) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

This section does not include analysis related to the capacity of soils to support septic tanks or alternative waste water disposal systems since sewers are available throughout the Golden Hill CPU area.

7.9.3 Impact Analysis

Issue 1 Seismic Hazards

Would the proposed project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?

No development is proposed as part of the proposed Golden Hill CPU and associated discretionary actions. However, future development associated with the implementation of the proposed Golden Hill CPU and associated discretionary could result in the exposure of more people, structures, and infrastructure to seismic hazards.

As presented in Section 7.9.1, the Golden Hill CPU area is traversed by two, north/south trending faults, the Florida Canyon Fault and the Texas Street Fault. (see Figure 7.9-3.) The City of San Diego Seismic Safety Study, Geological Hazards and Faults (2008 Grid Tile 17) describes the faults as "potentially active, inactive, presumed inactive, or activity unknown." A geotechnical investigation report that specifically addresses surface fault-rupture hazard is required for proposed projects located in the fault buffer zones. San Diego Municipal Code (SDMC) Section 145.1803(a)(2) indicates that no building permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards. Therefore, impacts related to surface fault rupture hazards would be considered less than significant for the proposed Golden Hill CPU and associated discretionary actions.

Severe ground shaking is most likely to occur during an earthquake on one of the regional active faults in the area. The Newport-Inglewood/Rose Canyon Connected fault, located to the northwest, is the active fault considered having the most significant effect from a design standpoint due to the close proximity. Based on a deterministic analysis, a maximum credible earthquake of moment magnitude M7.5 on the Newport-Inglewood/Rose Canyon Connected fault could produce an estimated peak horizontal ground acceleration of 0.50g within the proposed Golden Hill CPU area. Based on this analysis, damage from earthquake ground shaking could occur. Structural design in accordance with the current Building Code is intended to reduce the impact of earthquake shaking on buildings to an acceptable level of risk. Seismic design of future structures would be evaluated in accordance with the 2013 California Building Code (CBC) guidelines or those currently adopted by the City of San Diego. Design in accordance with the CBC would reduce potentially significant impacts to future structures from strong seismic ground shaking to a less than significant level.

All new development and redevelopment would be required to comply with the SDMC and the CBC, which includes design criteria for seismic loading and other geologic hazards and requires that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category (SDMC Section 145.1803).

No large landslides are mapped in the Golden Hill CPU area; however, small surficial instability could be present on steep slopes. Groundwater and landslides are not considered potential hazards for the Golden Hill CPU. A geotechnical investigation report that specifically addresses slope stability is required under the SDMC for proposed projects located on a landslide prone formation or slopes steeper that 25 percent (slope ratio of 4:1 horizontal to vertical). Potential slope instability would be subject to the recommendations contained in the geotechnical investigation report and requirements of the CBC and SDMC. Compliance with City regulations would reduce potential impacts associated with the development near non-conforming slopes to less than significant.

Additionally, the potential for liquefaction and seismically-induced settlement occurring for the mesa top areas is very low due to the very dense cemented condition of the geologic formations and lack of groundwater. An area along the southeast part of the Golden Hill CPU area has a low risk of soil liquefaction and seismically-induced settlement. Building construction in accordance with the SDMC and CBC would reduce this potential hazard to an acceptable level of risk.

Thus, while the Golden Hill CPU area would be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure, liquefaction, or landslides would be reduced to a less than significant level through implementation of site specific geotechnical report recommendations associated with future development within the Golden Hill CPU area.

Issue 2 Erosion or Loss of Topsoil

Would the project result in a substantial erosion or loss of topsoil?

The Golden Hill CPU area consists primarily of developed and previously graded land. Undeveloped land occurs in canyons and other open space areas. Implementation of the proposed Golden Hill

CPU and associated discretionary actions would allow for the intensification of some land uses that could lead to construction and grading activities that could temporarily expose topsoil and increase soil erosion from water and wind. Development of parcels within the proposed Golden Hill CPU area could remove the existing pavement and cover, thereby exposing soils to erosion during construction if protective measures are not taken.

SDMC Section 142.0146 requires all grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibits sediment and pollutants from leaving the work site and requires the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls shall include measures outlined in Chapter 14, Article 2, Division 2 Storm Water Runoff Control and Drainage Regulations) that address the development's potential erosion and sedimentation impacts. Conformance to these mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, would be subject to National Pollutant Discharge Elimination System General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan that would consider the full range of erosion control Best Management Practices, including any additional site-specific and seasonal conditions. Project compliance with National Pollutant Discharge Elimination System requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development. Impacts would be less than significant.

Issue 3 Geologic Instability

Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The majority of the Golden Hill CPU area is mapped as Geologic Hazard Category 52, characterized as low risk with favorable geologic structure. Other smaller hazard categories are mapped within the CPU area with low to moderate risk. Refer to Figure 7.9-2 for the location of these Hazard Categories.

No large landslides are mapped in the Golden Hill CPU area; however, surficial instability could be present on steep slopes. Future projects built in accordance with the proposed Golden Hill CPU and associated discretionary actions would be required to prepare a geotechnical investigation that specifically addresses slope stability if located on a landslide prone formations or slopes steeper that 50 percent (slope ratio of 2:1 horizontal to vertical) (SDMC Table 145.1803). Potential hazards associated with slope instability would be addressed by the site specific recommendations contained within the geotechnical investigations and required by the CBC and SDMC. Thus, impacts related to landslide and slope instability would be less than significant.

An area along the eastern margin of the Golden Hill CPU has a low risk of soil liquefaction and seismically-induced settlement (see Figure 7.9-2). The area is identified as Hazard Map Symbol 32, Low Potential – fluctuating groundwater, minor drainages. Impacts related to liquefaction include ground failure, settlement, or lateral spreading. The potential for liquefaction and seismically-induced settlement occurring within the Golden Hill CPU area is low across the majority of the area due to the very dense cemented condition of the geologic formations and lack of groundwater. Similarly, geologic hazards associated with risk of collapse would be low based on the dense underlying geologic formations. Based on the subsurface soil conditions and the lack of groundwater extraction occurring within the CPU area, the risk associated with ground subsidence hazards is low. Future development within the Golden Hill CPU area would be subject to requirements of the CBC and SDMC which includes preparation of a site specific geotechnical investigation and implementation of any geotechnical recommendations to ensure geologic instability hazards are avoided. Thus, with compliance with the CBC and SDMC, geologic instability impacts associated with future development within the Golden Hill CPU area would be less than significant.

Issue 4 Expansive Soils

Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Relative to soil expansion, the Golden Hill CPU area does not possess any expansive soils. Thus, no adverse impact related to expansive soils would occur with build-out of the proposed Golden Hill CPU and associated discretionary actions.

Cumulative Impact Analysis

Cumulative impacts related to geologic hazards within the Golden Hill CPU area and surrounding CPU areas such as North Park and Uptown would be less than significant with implementation of the regulatory framework discussed in the previous analysis. Geologic hazards occur from mapped faulting and site specific soil or geologic conditions. Development of the Golden Hill CPU area in combination with surrounding CPU areas would not compound to worsen potential geologic hazards. Geologic hazard conditions are site-specific and do not compound or increase in combination with projected development elsewhere in the county. Thus, as each individual development would be required to comply with remedial measures identified in a site specific geotechnical investigation, as required by the SDMC and CBC, cumulative impacts related to geologic hazards would be less than significant.

7.9.4 Significance of Impacts

Based on the Geotechnical Report prepared by GEOCON, Inc., the proposed Golden Hill CPU and associated discretionary actions would not have direct or indirect significant environmental impacts with respect to geologic hazards because future development would be required to occur in accordance with the SDMC and CBC. This regulatory framework includes a requirement for site

specific geologic investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project.

Adherence to the SDMC grading regulations and construction requirements and implementation of the recommendations and standards of the City's Geotechnical Study Requirements would preclude significant impacts related to erosion or loss of topsoil. Thus, impacts would be less than significant and no mitigation is required.

7.9.5 Mitigation Measures

Impacts of build-out of the proposed Golden Hill CPU and associated discretionary actions related to geologic conditions would be less than significant with implementation of existing SDMC requirements for preparation of geotechnical investigations prior to grading and construction and implementation of applicable measures identified in project specific geotechnical investigations. Thus, no mitigation is required.

7.10 Paleontological Resources

The analysis presented in this section evaluates the potential for impacts to paleontological resources based on existing geologic formations that underlay the Golden Hill CPU area. Refer to Section 7.9, for a discussion of the geologic formations that could be affected by the project (Figure 7.9-1). The following analysis is based on a review of available literature, including the City's General Plan, Kennedy maps, the City's Paleontological Guidelines, and the publication of *Paleontological Resources, County of San Diego* by Deméré and Walsh (1994).

7.10.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. As described in the Chapter 2.0, Environmental Setting (Section 2.3.9 Geology and Paleontology) of this this draft Program Environmental Impact Report (PEIR), the Golden Hill CPU area is underlain by San Diego Formation, which is assigned a high paleontological resource sensitivity. Refer to Section 2.3.10 for additional discussion of the existing setting for paleontological resources and sensitivity ratings.

7.10.2 Significance Determination Thresholds

The City of San Diego's California Environmental Quality Act (CEQA) Significance Thresholds provides guidance to determine potential significance to paleontological resources. Based on the City's Thresholds, a significant impact related to paleontological resources would occur if the proposed CPU and associated discretionary actions would:

1) Result in development that requires:
   - over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or
   - over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City's CEQA Significance Thresholds includes a Paleontological Determination Matrix to support the City's significance thresholds that is included in Section 2.3.10 of this PEIR. Additionally, the significance thresholds provide the following additional guidance for determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
- If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

7.10.3 Impact Analysis

Issue 1 Paleontological Resources

Would the project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, activities that excavate or grade geologic formations that could contain fossil resources would be significant. The proposed Golden Hill CPU area is underlain by the San Diego Formation, which is considered to have a high potential for containing fossil resources. The Golden Hill CPU area is not underlain by any moderate resource potential formations, thus, no impacts relative to moderate resource potential formations would occur.

Grading associated with future development projects implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions that involve excavation into the underlying geologic formation could expose the formation and associated fossil remains. These development projects, both ministerial and discretionary, could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a potentially significant impact. Thus, impacts resulting from future development would be potentially significant (Impact 7.10).

Build-out of future ministerial projects implemented in accordance with the proposed Golden Hill CPU would likely result in a certain amount of disturbance to the native bedrock within the CPU area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with build-out of the proposed Golden Hill CPU and associated discretionary actions would be potentially significant (Impact 7.11)

Impact 7.10: Grading activities associated with the future discretionary projects that require grading in excess of 1,000 cubic yards, extending to a depth of ten feet or greater into a high sensitivity formation, could result in significant impacts to paleontological resources.

Impact 7.11: Grading activities associated with the future ministerial projects that require grading in excess of 1,000 cubic yards, extending to a depth of ten feet or greater into a high sensitivity formation, could result in significant impacts to paleontological resources.

Cumulative Impacts

Development allowed pursuant to the proposed Golden Hill CPU and development within surrounding CPUs could involve excavation of previously undeveloped areas, some of which may consist of unique paleontological resources with fossil-bearing potential. Potential cumulative

impacts to paleontological resources were evaluated in the General Plan PEIR. The analysis concluded that there is potential for the cumulative loss of paleontological resources throughout the county as the county continues to develop in response to projected population growth. Likewise, development of the Golden Hill CPU area may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Certification of the General Plan PEIR included the adoption of mitigation measures that attempt to reduce significant project-level impacts from future development. However, as discussed above, there is only a mechanism to apply the mitigation framework to discretionary projects, not to ministerial projects. Thus, within the Golden Hill CPU area and surrounding communities, significant impacts to paleontological resources could occur associated with grading for ministerial projects. Similar to the General Plan PEIR, build-out of ministerial projects within the Golden Hill CPU area would result in significant cumulative impacts to paleontological resources (Impact 7.11).

7.10.4 Significance of Impacts

Because of high sensitivity for paleontological resources within the San Diego Formation, grading into this formation could potentially destroy fossil resources. Therefore, implementation of future ministerial and discretionary projects within the proposed Golden Hill CPU area within the San Diego Formation has the potential to result in significant impacts to paleontological resources.

7.10.5 Mitigation Measures

In order to reduce the potential adverse impact to paleontological resources associated with discretionary projects, the project would incorporate the mitigation measure identified in the General Plan PEIR addressing paleontological resource impacts.

The following measure would apply to any discretionary project that proposes subsurface disturbance within a high-sensitivity formation. If no subsurface disturbance is planned, then the paleontological resources would not be impacted and development of a project-specific paleontological monitoring and discovery treatment plan would not be necessary. The following mitigation measure would reduce Impact 7.10 to a less than significant level.

PALEO 7.10 Prior to the approval of subsequent discretionary development projects implemented in accordance with the proposed Golden Hill CPU, the City shall determine the potential for impacts to paleontological resources within a high-sensitivity formation based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project-level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review.

I. Prior to Project Approval

A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable United States Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- Required over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resources potential geologic deposit/formation/rock unit.
- Require over 2,000 cubic yards of excavation and/or 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.
- Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.

- Monitoring is always required when grading on a fossil recovery site or a known fossil location.
- Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).
- Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded, and/or unweathered geologic deposits/formations/rock units are present at the surface.
- Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a Paleontological Mitigation Monitoring and Report Program shall be implemented during construction grading activities.

7.10.6 Significance of Impacts after Mitigation

All future discretionary projects that could occur as a result of the proposed Golden Hill CPU would be required to comply with mitigation measure PALEO 7.10. Implementation of mitigation measure PALEO 7.10 would reduce paleontological impacts associated with future discretionary development to below a level of significance.

Build-out of future ministerial projects proposed in conformance with the proposed Golden Hill CPU and associated discretionary actions would also likely result in a certain amount of disturbance to the native bedrock within the CPU area. Since ministerial projects are not subject to a discretionary

review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with build-out of the proposed Golden Hill CPU and associated discretionary actions would remain significant and unavoidable.

7.11 Hydrology/Water Quality

This section addresses the potential hydrology and surface and groundwater quality impacts that would result from the project. It relies on secondary source information and policies contained within the proposed Golden Hill Community Plan Update (CPU). This section also details applicable regulations, receiving waters, flood hazards, and other relevant existing conditions within the study area.

7.11.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. Additional detail regarding conditions specific to the Golden Hill CPU are discussed further below.

7.11.1.1 Drainage

The Golden Hill community is located on a mesa top incised with a complex network of canyons. Areas to the north of the Golden Hill CPU area drain to the San Diego River which is located in Lower San Diego Hydrologic Area (HA) 907.10 (Figure 7.11-1), The area of the Golden Hill community drains via the canyon systems and storm drains to San Diego Bay.

The Golden Hill CPU area drains to San Diego Bay and is located in the Pueblo San Diego Watershed, San Diego Mesa Hydrologic Area (HA) 908.20. This area is divided into two Hydrologic Subareas, The most westerly portion is in the Lindbergh Hydrologic Subarea (HSA) "908.21," and the remainder is in the Chollas Hydrologic Subarea (HSA) "908.22. Figure 7.11-1 shows the location of HA 907.10 to the north of and HA 908.20 where Golden Hill is located. If should be noted that not all of the community areas in the Chollas Hydrologic Subarea drain to Chollas Creek. Some of these areas, for instance, drain to Switzer Creek, which discharges directly to San Diego Bay. The Pueblo San Diego watershed is the smallest hydrologic unit in San Diego County, encompassing approximately 60 square miles of predominantly urban landscape in the cities of San Diego, La Mesa, Lemon Grove, and National City. The watershed contains the smallest proportion of unincorporated area (0.3 percent) of the hydrologic units within the county. The population of the Pueblo San Diego watershed is the county's most densely populated watershed, with approximately 75 percent of the watershed is developed. Due to the high level of existing urbanization in the watershed, only small amounts of additional land is projected for development over the next 15 years (Project Clean Water 2016; www.projectcleanwater.org).

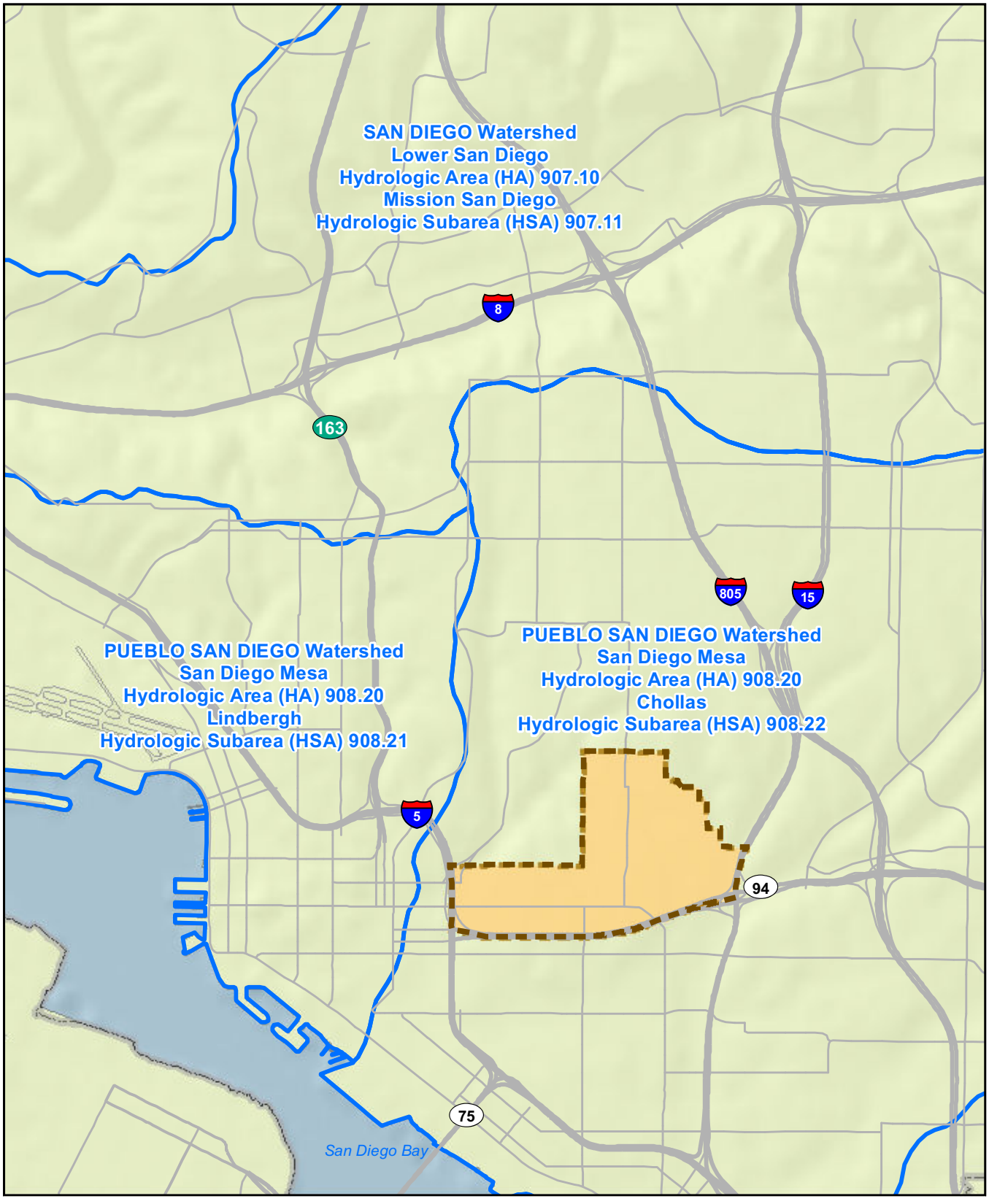


FIGURE 7.11-1

Watersheds – Golden Hill

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7.11.1.2 Water Quality

The beneficial uses of the inland surface waters in the Pueblo San Diego watershed are limited to contact recreation (potential use activities involving a significant risk if ingestion of water, including wading by children and swimming) and non-contact recreation (aquatic recreation pursuits not involving a significant risk of water ingestion, including fishing and limited body contact incidental to shoreline activity), warm freshwater habitat, and wildlife habitat. The San Diego Bay receiving water supports an extensive array of beneficial uses (EPA 2012).

The existing coastal beneficial uses identified for San Diego Bay include industrial service supply, navigation, contact water recreation, non-contact water recreation, commercial and sport fishing, preservation of biological habitats of special significance, estuarine habitat, wildlife habitat, rare, threatened, or endangered species, marine habitat, migration of aquatic organisms, spawning, reproduction, and/or early development, and shellfish harvesting (RWQCB 1994).

The watershed drainage consists of a group of relatively small local creeks and pipe conveyances, many of which are concrete-lined and drain directly into San Diego Bay. The creeks in the watershed are highly impacted by urban runoff, and Chollas Creek and the mouth of the creek in San Diego Bay are listed as 303(d)-impaired water bodies for various trace metals parameters and aquatic toxicity. Several sites in San Diego Bay that are impacted by runoff from the Pueblo San Diego watershed have been identified as hot spots by California's Bay Protection Toxic Cleanup Program.

Impairments from multiple pollutants have led to establishment of Chollas Creek total maximum daily loads (TMDLs). Five TMDLs have been adopted for Chollas Creek: the pesticide (diazinon) TMDL (with a final compliance date of December 31, 2010), the dissolved metals TMDLs (for copper, lead and zinc), and an indicator bacteria TMDL. Multiple agencies, including the City of San Diego, the Cities of La Mesa and Lemon Grove, the County of San Diego, the San Diego Unified Port District, Caltrans, and the U.S. Navy, were among those identified as having responsibility in reducing pollutants to mandated levels. The indicator bacteria TMDL is being re- evaluated based upon new scientific data. Implementation Plans are designed to meet the requirements of the metals and bacteria TMDLs over a 20-year period, with phased incremental reductions required. Implementation Plans use an integrated approach to meet these requirements. Both structural and non-structural best management practices (BMPs) are being implemented to achieve waste load reductions.

7.11.1.3 Groundwater

Groundwater within the San Diego Mesa is except from municipal and domestic supply beneficial use, as it was determined by the 1989 Regional Water Quality Control Board's Resolution No. 89-33 that this area had been previously determined to not support municipal and domestic supply. Groundwater within Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply (RWQCB, 1994 as amended).

7.11.1.4 Urban Runoff Management

Urban runoff is surface water runoff generated from developed or disturbed land associated with urbanization. The increase in impervious surfaces and fewer opportunities for infiltration within the landscape increase storm flows and provides a source for sediment and other pollutants to enter receiving waters. Urban runoff is a major component of urban flooding and is a particular problem for management of watersheds. Urban runoff is the largest pollution source of Southern California's coastal beaches and near-shore waters. Urban runoff control programs typically focus on managing the effect that new impervious surfaces have on stream channels, but may also provide remediation of existing problems. The Golden Hill community is within the Pueblo San Diego Watershed which ultimately discharges into San Diego Bay.

7.11.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed Golden Hill CPU and associated discretionary actions, a significant hydrology/water quality impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary actions would:

1) Result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff;

2) Result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or

3) Deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge.

7.11.3 Impact Analysis

Issue 1 Flooding and Drainage Patterns

Would the project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?

Golden Hill is an urban community within the City, and the majority of the CPU area is developed. Large areas of impervious surfaces (buildings, roadways and surface parking) are mixed with a smaller amount of pervious (landscaping, parks) areas.

Future projects that could occur within the Golden Hill CPU area would result in an increase in impervious areas due to the new buildings, hardscape, and parking areas. Landscaping, as well as pervious pavements used in lieu of standard pavement, diminish a project's increase in impervious areas and therefore, diminish a project's increase in urban pollutants. Implementation of the CPU would also have the potential to change surface runoff characteristics, including the volume of

runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could result in flooding and/or erosion.

Future projects would be required to comply with the NPDES and Hydromodification Management Plan (HMP) requirements as described in the City of San Diego Stormwater Standards Manual. Storm water detention and HMP facilities would be implemented to accommodate the potential increase in storm water runoff rates due to the proposed increase in impervious areas. To fulfill the HMP requirements, projects would need to be designed so that runoff rates and durations are controlled to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. Projects would typically manage the increase in runoff by implementing a series of storm water BMPs and detention facilities that have been specifically designed for Hydromodification Management.

With implementation of the regulatory framework in place addressing pre and post-development run-off rates, implementation of the CPU would not result in an increase in flooding. Additionally, based on a review of FEMA's Flood Insurance Rate Maps (FIRM), the planning area is not subject to flooding risks with the exception of one area at the southeast corner of the planning area along I-15. However, this area would not be subject to future development due to its location at a canyon bottom within an existing drainage.

While the proposed Golden Hill CPU and associated discretionary actions would allow for increased density, the permitted changes in land use would occur largely as infill and redevelopment. The community has a sizable amount of pervious land, largely in open space canyons and park lands, which is not available for urban development. As implementation of the CPU occurs, future development and redevelopment would have the potential to improve drainage characteristics of existing sites through compliance with current municipal storm water requirements including implementation of LID practices that retain a portion of storm water on-site for infiltration, reuse, or evaporation.

The proposed Golden Hill CPU Elements also include policies related to hydrology and water quality that would be applicable to future development. The Conservation Element of the proposed Golden Hill CPU contains a goal related to the improvement of the hydrology and drainage within the proposed Golden Hill CPU area – specifically the application of sustainable urban runoff management techniques applied to support the surrounding landscape and reduce impacts on the surrounding canyons. Other proposed Conservation Element policies address management of urban runoff and repair and retrofit of storm drain discharge systems in open space areas to prevent erosion and improve water quality.

In addition, all development in the City is subject to drainage regulations through the SDMC, which require that the existing flows of a property proposed for development be maintained to ensure that the existing structures and systems handling the flows are sufficient. Development that adheres to this basic objective of the existing drainage regulations would not result in alterations to existing drainage patterns in a manner that would result in flooding or erosion on- or off-site. Adherence to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which require installation of LID practices such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, can be expected to improve surface drainage conditions or, at a minimum, not exacerbate flooding or cause erosion. Furthermore, future development that adheres to these

requirements, as well as NPDES permit requirements, would reduce the volume and rate of surface runoff compared to the existing condition rather than increase runoff. The quantity of runoff reduction would depend on the actual design of open space, pervious areas, run-off retention, and the manner of implementation of LID practices. Thus, impacts would be less than significant.

Issue 2 Water Quality

Would the project result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

Future development projects that could occur in the Golden Hill community under the proposed Golden Hill CPU and associated discretionary actions would have the potential to change pollutant discharges. Applicable NPDES permit requirements require the retention and/or treatment of storm water through the implementation of Best Management Practices (BMPs). Future development would be required to demonstrate how pollutants such as trace metals (e.g., copper, lead, zinc, and mercury), fecal coliform, low dissolved oxygen, phosphorus, and TDS, that could be associated with future development, would treated to prevent discharge into receiving waters. Much of the existing development in the area was constructed before current storm water regulations were adopted. Thus, future development and redevelopment would be subject to current, more stringent requirements that would likely improve water quality.

Under current storm water regulations in the City, all projects requiring discretionary approvals are subject to certain minimum storm water requirements to protect water quality. Types of storm water BMPs required for new development include site design, source control, and treatment control practices, many of which overlap with LID practices. Storm water BMPs would reduce the amount of pollutants transported from a future proposed development project to receiving waters.

Runoff related to roadway variables, including truck traffic, curbs, barriers, grass shoulders, landscaping; traffic characteristics such as speed and braking; vehicle characteristics such as age and maintenance; roadway composition and maintenance practices; and issues such as littering also affect pollutant concentrations. The City requires implementation of storm water BMPs for streets that would reduce the flow of pollutant concentrations to receiving waters. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. Adherence to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual, for design of new development and infrastructure under the proposed Golden Hill CPU and associated discretionary actions, would maintain or possibly improve water quality conditions. Impacts would be less than significant and no mitigation is required.

Issue 3 Groundwater

Would the project deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge?

Based on the Water Quality Control Plan for the San Diego Basin (April 2011), most of the ground waters in the region have been extensively developed; the availability of potential future uses of

ground water resources is limited. Further development of ground water resources would probably necessitate ground water recharge programs to maintain adequate ground water table elevations. Groundwater within the San Diego Mesa is except from municipal and domestic supply beneficial use, as it was determined by the 1989 Regional Water Quality Control Board's Resolution No. 89-33 that this does not support municipal and domestic supply. Groundwater within Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply.

As discussed under Issues 1 and 2 above, current storm water regulations encourage infiltration of storm water runoff and protection of water quality which would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact on groundwater supply and quality.

Cumulative Impacts

Future projects within the North Park CPU area and surrounding areas including projects within the Golden Hill and Uptown CPUs, could have a cumulative impact on hydrology and water quality, including downstream problems with flooding, sizing of drainage facilities, erosion, and sedimentation.

However, all future development within the CPU areas be required to comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more or a Water Quality Control Plan if the disturbed area is less than one acre. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment.

Pursuant to the City's Storm Water Standards, future development would be required to implement construction, post-construction, and permanent BMPs in addition to hydromodification management, to minimize water quality impacts both during the construction and operation phases. Future development projects could be required to enter into a Storm Water Management and Discharge Control Maintenance Agreement with the City to ensure the maintenance of the permanent BMPs. Future development would also be required to implement these mandated water quality protection measures and, through adherence to the City's NPDES permit~~, Standard Urban Stormwater Management Plan,~~ and the City's Storm Ww~~a~~ater Standards Manual, would prepare project-specific SWPPPs and implement practices that would preclude significant water quality impacts. Additionally, proposed CPU policies within each of the CPU areas addressing adequate and reliable stormwater facilities and protection of water quality would further reinforce the existing regulatory framework. As future development would be required to adhere to the local, State, and Federal regulations, implementation of the proposed CPUs would result in less than significant cumulatively impacts on hydrology and water quality.

7.11.4 Significance of Impacts

Issue 1 Flooding and Drainage Patterns

All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed Golden Hill CPU and associated discretionary actions would either remain the same as the existing condition or would be reduced when compared to the existing condition. Impacts would be less than significant and mitigation is not required.

Issue 2 Water Quality

New development under the proposed Golden Hill CPU and associated discretionary actions would be required to implement LID and storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from Golden Hill to receiving waters. Impacts would be less than significant and no mitigation would be required.

Future development would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual. With implementation of these requirements, both surface and ground~~,~~ water quality conditions would be protected and implementation of the CPU would ~~, both surface and groundwater, are~~ not be expected to have an adverse effect on water quality. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. Impacts would be less than significant, and no mitigation would be required.

Issue 3 Groundwater

Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use and does not support municipal and domestic supply. Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact on groundwater supply and quality.

7.11.5 Mitigation Measures

Implementation of the proposed Golden Hill CPU and associated discretionary actions would not result in significant impacts to the environment. No mitigation is required.

7.12 Public Services and Facilities

Public services are those functions that serve residents on a community-wide basis. These functions include police protection, parks and recreation centers, fire protection, libraries, and schools. The following provides a discussion of public services and facilities as they relate to the proposed Golden Hill Community Plan Update (CPU) and associated discretionary actions. This section is based on communication from service providers, which are included in Appendix J of this draft Program Environmental Impact Report (PEIR).

7.12.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 5.0, respectively. Existing conditions applicable to Golden Hill specifically are discussed below. Figure 7.12-1 illustrates the location of the public services discussed below.

7.12.1.1 Police Protection

The Golden Hill community is served by the Central Division of the Police Department. The Central Division station is located at 2501 Imperial Avenue (Figure 7.12-1). The average response times for the Central Division for 2014 were 6.3 minutes for emergency calls, 11.4 minutes for priority one calls, 32.2 minutes for priority two calls, 79.5 minutes for priority three calls, and 77.7 minutes for priority four calls. The San Diego police Department's Citywide response time goals are seven minutes for emergency calls, 14 minutes for priority one calls, 27 minutes for priority two calls, 68 minutes for priority three calls, and 70 minutes for priority four calls.

7.12.1.2 Parks and Recreation Facilities

Golden Hill is served by the Bud Kearns Aquatic Complex and the Golden Hill Recreation Center, located within Balboa Park. The Golden Hill Recreation Center provides an indoor gymnasium, a meeting room, a kitchen, and a community clubhouse. At full community development, the projected population for the Golden Hill community is 24,010. Therefore, according to General Plan standards for population-based parks of 2.8 usable acres per 1,000 residents, the community should be served by a minimum of 67.23 useable acres of park land at full community development. Additionally, at full community development, the project population warrants approximately one recreation center equivalent to 15,000 total square feet and approximately one-half aquatic complex. Of the total of 67.23 acres of population-based parks needed to serve Golden Hill at full community development, zero acres currently exist. Currently, the Community Plan area is served by the Golden Hill Recreation Center.

Map Source: SanGIS

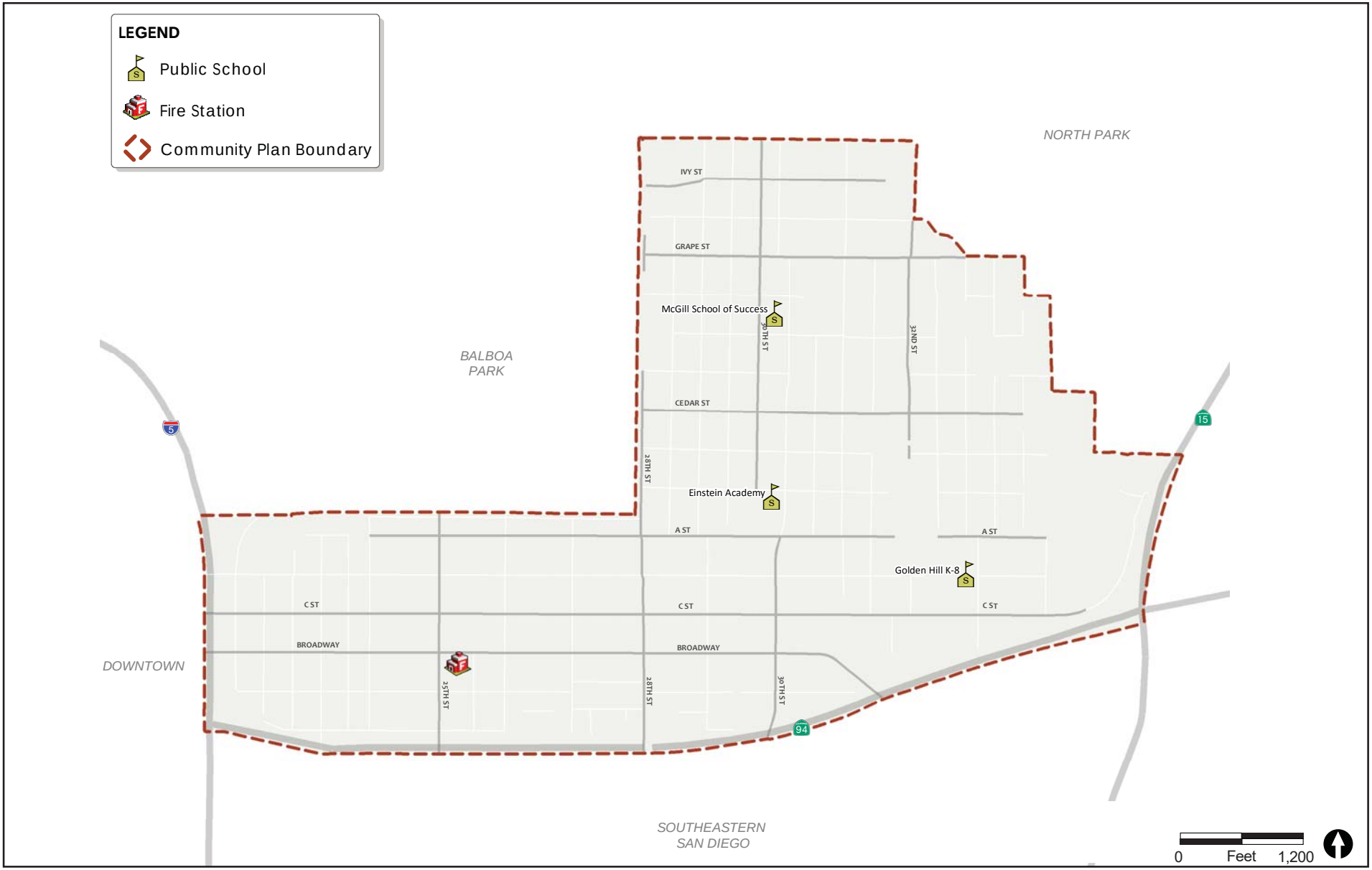


FIGURE 7.12-1
Location of Public Services and Facilities – Golden Hill

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7.12.1.3 Fire/Life Safety Protection

Fire protection for the community is provided primarily by Fire Station 11. Station 11 is located within southwestern portion of the community at the intersection of Broadway and 25th Street (see Figure 7.12-1). Response time standards are detailed in Chapter 5.0, Regulatory Framework.

7.12.1.4 Libraries

The Golden Hill community is served by several library facilities in adjacent communities. The recently expanded Central Library at 330 Park Boulevard in the East Village neighborhood of Downtown provides the community access to the City's largest library. Other libraries are the North Park branch library located at 3795 31st Street and the Logan Heights branch library located at 567 South 28th Street.

7.12.4.5 Schools

The San Diego Unified School District opened Golden Hill School as a new facility located at 1240 33rd Street in January 2006. The school currently operates as a grades K-8 school and accommodates up to 700 students. The district also provides charter schools – the Albert Einstein Academy elementary school at 3035 Ash Street and the McGill School of Success at 3025 Fir Street. In addition, public and private schools in neighboring communities also serve the community including Roosevelt Junior High and San Diego High School.

7.12.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed Golden Hill CPU, a significant public services and facilities impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary actions would:

1) Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

7.12.3 Impact Analysis

Issue 1 Public Facilities

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, or maintenance of public facilities including roads), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

a. Police Protection

The Central Division and Mid-City of the San Diego Police Department operates under the Citywide response time goals detailed in Chapter 5.0, Regulatory Framework (Section 5.12.1.1) of this PEIR. The Central Division responds to emergency calls and priority one and four calls; the Mid-City Division responds to priority two and three calls. There are no current plans for additional police substations in the proposed Golden Hill CPU area. Correspondence with the San Diego Police Department identified that police response times within Golden Hill will continue to increase with the build-out of the Community Plan, which could ultimately result in the need for new or expanded police services. However, as future development is proposed within the CPU area, individual projects would be subject to applicable Development Impact Fees (DIF) for public facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for Golden Hill that will define applicable DIF fees for future development, including fees for police facilities funding.

Proposed Golden Hill CPU Public Facilities, Services and Safety policies provide support for improving community safety including defining guidelines to reduce incidence of criminal activity within the Golden Hill neighborhoods, including Neighborhood Watch Programs, neighborhood organizations and a continuing exchange of information with patrol officers, maintenance of community relations program between residents and police, and ensuring development projects provide adequate lighting, visibility, and gradations between public and private space. The proposed Public Facilities, Services and Safety Element advocates maintaining Golden Hill under one police patrol beat to increase visibility and improve response times.

As population growth occurs and the need for new facilities is identified, any future construction of police facilities would be subject to a separate environmental review at the time design plans are available. Thus, while build-out of the CPU could result in the demand for new or altered police services, the existing DIF framework in place would require future projects within the CPU area to pay fees for future facility needs. Additionally, no police facilities are currently proposed. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in less than significant environmental impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services.

b. Parks and Recreation

Based on the projected population for the Golden Hill community of 24,010, General Plan standards for population-based parks and recreation facilities would require the community to be served by a minimum of 67.23 useable acres of park land at full community development. Additionally, at full community development, the projected population warrants approximately one recreation center equivalent to 16,320 total square feet, and approximately one-half aquatic complex.

Opportunities for additional park land and recreation facilities within the Golden Hill community are anticipated to come primarily through redevelopment of private and public properties and through the application of park equivalencies. Facilities that may be considered as population-based park equivalencies include:

- Joint use facilities;
- Trails through open space;
- Portions of resource-based parks;
- Privately owned, publicly used parks;
- Non-traditional parks, such as rooftop or indoor recreation facilities; and
- Facility or building expansion or upgrades.

The General Plan allows park equivalencies to be used when vacant land is limited, unavailable or is cost-prohibitive. The application of park equivalencies is determined by the community and City staff through a set of guidelines. Golden Hill is an urbanized community where park equivalencies are appropriate for satisfying some of the community's population-based park needs. The community and City identified and evaluated population-based park and recreation opportunities, as well as potential park equivalency sites, for their recreational value, possible uses and functions, public accessibility, consistency with General Plan policies and guidelines, and other land use policy documents (e.g., Balboa Park Master Plan and Balboa Park East Mesa Precise Plan). Creation of joint use facilities within the Golden Hill Community schools were considered and determined to be infeasible at this time due to constrained sites. However, joint use would be pursued in the future if school sites are expanded or redeveloped, which frees up land that could be utilized for recreational purposes.

A variety of sites and facilities within and adjacent to the Golden Hill community do, or could, serve as population-based parks or park equivalencies. Tables 7.12-1 and 7.12-2 summarize the existing and future parks, park equivalencies and recreation facilities that have been selected by the Golden Hill community to supplement their existing population-based park and recreation facilities inventory. The table also includes recommendations contained in the Balboa Park East Mesa Precise Plan for the Neighborhood Edge, as well as recommendations generated by the community and City staff for facilities outside Balboa Park. Figure 7.12-2 shows the locations of park facilities.

A total of 67.23 acres of population-based parks would be needed to serve Golden Hill at full community development, of which zero acres currently exist. Through the proposed Golden Hill CPU effort, City staff and community members have identified 48.57 acres of proposed new population-based park land and park equivalency sites within and adjacent to the Golden Hill community, that when implemented would reduce the deficit to 18.66 acres.

Build-out of the proposed Golden Hill CPU would add additional population to the CPU area and the CPU area would continue to have a deficit of population based parks at build-out; which would be an adverse impact. Future development proposed within the CPU area would be subject to payment of DIF for public facilities financing in accordance with Municipal Code Section 142.0640 which would provide some funding to address the existing park deficit. The proposed comprehensive update to the existing Impact Fee Study for Golden Hill would define applicable DIF fees for future development, including fees for park funding. However, fees would not be adequate to address the extent of the parkland deficit. Payment and receipt of DIF funds is contingent on future development and proposed fees are not designed to fully fund and address the parkland deficit.

Additionally, the proposed Golden Hill CPU Recreation Element provides a policy framework that supports acquisition and development of new public parks and park equivalencies and encourages new private development to include recreational facilities.

Thus, although the existing and projected deficit in population-based parks is adverse, impacts associated with the construction of park facilities would be less than significant at the program-level. Implementation of the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage of population based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact associated with the construction of new facilities in order to maintain performance objectives for parks.

Table 7.12-1
Population-Based Parks and Recreation Facilities – Golden Hill

Parks/ Recreation Facilities	2015 Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Locations and Descriptions	Parks and Recreation Facilities Recommendations
Major Parks - None				
Community Parks - None				
Neighborhood Parks				
32nd Street Neighborhood Park		3.81	Proposed neighborhood park located on 7 parcels of privately-owned property, between C Street and Broadway. The City Public Utilities Dept. may acquire the site for a groundwater production facility which could be incorporated into active and passive recreational facilities	Acquire, design and construct passive recreational facilities, such as open turf areas, walkways, security lighting, site furniture, signage, public art and landscaping. If City Public Utilities Dept. acquires land coordinate active and passive recreational facilities on site.
Mini Parks - None				
Pocket Parks/Plazas				
Broadway and Glendale Avenue Pocket Park		0.08	Proposed pocket park located on undeveloped street right-of-way to accommodate passive recreational uses.	Vacate street right-of-way, acquire land, design and construct passive recreation, such as walkways, security lighting, site furniture, signage, public art and landscaping.
E and 28th Streets Pocket Park		0.22	Proposed pocket park located on one parcel of privately-owned property, between E Street and 28th Street	Acquire, design and construct passive recreational facilities, such as open turf areas, walkways security lighting, site furniture, signage, public art and landscaping.

Table 7.12-1
Population-Based Parks and Recreation Facilities – Golden Hill

Parks/ Recreation Facilities	2015 Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Locations and Descriptions	Parks and Recreation Facilities Recommendations
Elm and Bancroft Pocket Park		0.14	Proposed pocket park on street right-of-way to accommodate passive recreational uses.	Vacate street right-of-way, acquire land, design and construct passive recreation, such as walkways, security lighting, site furniture, signage, public art and landscaping.
Special Activity Parks - None				
Recreation Centers				
Golden Hill Recreation Center (within Balboa Park)	N/A	N/A	Existing 10,035 sq. ft. community-oriented recreation facility located in Golden Hill Community Park with existing amenities including an indoor gymnasium, a meeting room, kitchen and community clubhouse.	Expand recreation center to 16,320 sq. ft. by adding 6,285 sq. ft. in one or more building structures on site.
Aquatic Complexes				
Bud Kearns Aquatic Complex (within the Morley Field area of Balboa Park)	N/A	N/A	The existing historic Bud Kearns Pool and Clubhouse were built in 1933 and provide one community swimming pool and a building with changing rooms, showers and restrooms. (Shared between the Golden Hill and North Park communities).	Preserve, restore and renovate the existing historic Bud Kearns pool facility to serve the communities. Provide additional swimming facilities such as a children's play pool, therapeutic pool, and clubhouse building facilities to meet the needs of the community. The new facilities would augment and be complementary to the existing pool and clubhouse without compromising the historic character.
Joint Use Facilities - None				
Trails: Useable acres credit for trails was determined by multiplying the linear footage of trail by 12'-0" width and divided by one acre in square feet (43,560)				
32nd Street Canyon Open Space Trails		1.00	Proposed trail amenities along existing trails located in the 32nd Street Canyon Open Space.	Design and construct trail amenities along existing trails (3,604 lineal feet) such as trailheads, kiosk, way-finding maps, interpretive signs, protective fencing, native landscaping, trash and recycling containers, benches and overlooks, where needed and appropriate for the trail type as determined by City.
34th Street Canyon Open Space Trails		1.35	Proposed new trail segment and trail amenities along existing trails located in the 34th Street Canyon Street Open Space.	Design and construct 142' lineal feet of new trails and trail amenities along existing trails (4,754 lineal feet), such as trailheads, kiosk, wayfinding maps, interpretive signs, protective fencing, native landscaping, trash and recycling containers, benches and overlooks, where needed and appropriate for the trail type as determined by City.
Portion of Resource-Based Parks				

Table 7.12-1
Population-Based Parks and Recreation Facilities – Golden Hill

Parks/ Recreation Facilities	2015 Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Locations and Descriptions	Parks and Recreation Facilities Recommendations
28th Street Park (within Balboa Park)		3.05	Proposed park equivalency located on 28th Street, with existing park amenities that include a children's play area, picnic tables, benches, lawn areas, and a comfort station.	Design and construct an additional 2.62 acres of passive recreation by expanding the children's play area, providing additional picnic tables and benches, and upgrading/replacing the comfort station.
Golden Hill Community Garden (within Balboa Park)		0.28	Proposed park equivalency located on Russ Blvd. with an existing, approximately 5,000 square foot community garden area; operated and maintained by a not-for-profit entity.	Design and construct an additional 7,500 sq. ft. area and provide site amenities for gardeners and community visitors, alike, such as additional gardening plots, potting shed, communal gathering or stage area, shade structure, passive seating/picnicking, site furniture, fencing, security lighting, and public art.
Golden Hill Community Park (within Balboa Park)		7.26	Proposed park equivalency located on 26th Street with existing park amenities that include a multi-purpose lighted sports field which supports youth and adult softball and baseball, two outdoor basketball courts, one handball court, passive lawn areas with picnic facilities, a comfort station and a children's play area.	Design and construct expanded recreational and support facilities, including approximately 1.0 acre of additional parking, and security lighting, to accommodate future uses and special community events.
Golden Hill Park (within Balboa Park)		12.53	Proposed park equivalency located on Russ Blvd. with existing park amenities that include a loop road with three small individual parking areas, passive multi-purpose turf areas and views to Downtown.	Design and construct additional park amenities to support neighborhood passive recreation; enhance the gateway into the park area with park signage.
Golden Hill Pocket Park (within Balboa Park)		0.61	Proposed park equivalency located adjacent to the Golden Hill Community Garden area.	Design and construct passive recreational uses, such as a children's play area, parking area, security lighting, accessible walkways and landscaping.
Pershing Recreation Complex (within Balboa Park)		1.49	Proposed park equivalency located at the corner of Pershing Dr. and 26th Street. This site is currently used by City Central Operations Station facilities. This facility is a total of 15 acres and will be shared with; North Park; Golden Hill and Uptown and Downtown.	Design and construct a community park/sports complex with active recreation facilities consistent with the recommendations in the BPEMPP, subsequent to relocation of non-park, City facilities.
Skate Park/Bike Skills Park (within Balboa Park)		10.0	Proposed park equivalency located along Pershing Drive. Facility is a total of 20 acres and will be shared with North Park and Golden Hill.	Design and construct an above-ground skate park and/or Bike Skills/BMX track, and support facilities, such as parking lot and portable restrooms. Amendment of the BPEMPP may be necessary.

Table 7.12-1
Population-Based Parks and Recreation Facilities – Golden Hill

Parks/ Recreation Facilities	2015 Useable Acreage	Future Useable Acreage	Parks and Recreation Facilities Locations and Descriptions	Parks and Recreation Facilities Recommendations
Privately-Owned Park Sites - None				
Non-Traditional Park Sites				
F Street Linear Park		0.38	Proposed linear park on street right-of-way on south side of F Street, extending from 22nd to 25th Streets, this will require the elimination of one traffic lane and parallel parking on the south side of F Street to accommodate passive recreational uses.	This project will require a Traffic Study to determine if one lane of traffic and parallel parking can be removed. If the Traffic Study allows changes to the street, the next steps would be to vacate the street right-of-way, acquire land, design and construct passive recreation facilities such as walkways, security lighting, site furniture, signage, public art and landscaping.
Facility or Building Expansion or Upgrade - None				

Table 7.12-2
Summary of Existing and Proposed Population-Based Parks and Recreation Facilities – Golden Hill

Population-based Parks	Useable Acres
Existing Population-based Parks and Park Equivalencies	0.00 acres
Proposed Population-based Parks and Park Equivalencies	48.57 acres
Total Existing and Proposed Population-based Parks and Equivalencies	48.57 acres
Population-based Park Requirements at full community development	67.23 acres
Population-based Park Deficit at full community development	18.66 acres
Recreation Center	**Square Feet**
Existing Recreation Center: Golden Hill Recreation Center	10,035 SF
Proposed Recreation Center addition: Golden Hill Recreation Center	6,285 SF
Total Existing and Proposed Recreation Center	16,320 SF
Recreation Center Requirement at full community development	16,320 SF
Recreation Center deficit at full community development	No deficit
Aquatic Complex	**Unit**
Existing Aquatic Complex	0.00
Proposed Aquatic Complex: Bud Kearns Community Swimming Pool	1.94*
Total Existing and Proposed Aquatic Complex:	1.94*
Aquatic Complex Requirement at full community development	0.48*
Aquatic Complex deficit at full community development	No deficit

*Bud Kearns Community Swimming Pool will be shared. Greater Golden Hill requires 0.48, and North Park requires 1.46, aquatic complexes. The proposed, larger facility will satisfy the combined requirements (1.94 aquatic complexes) for both communities.

Map Source: SanGIS

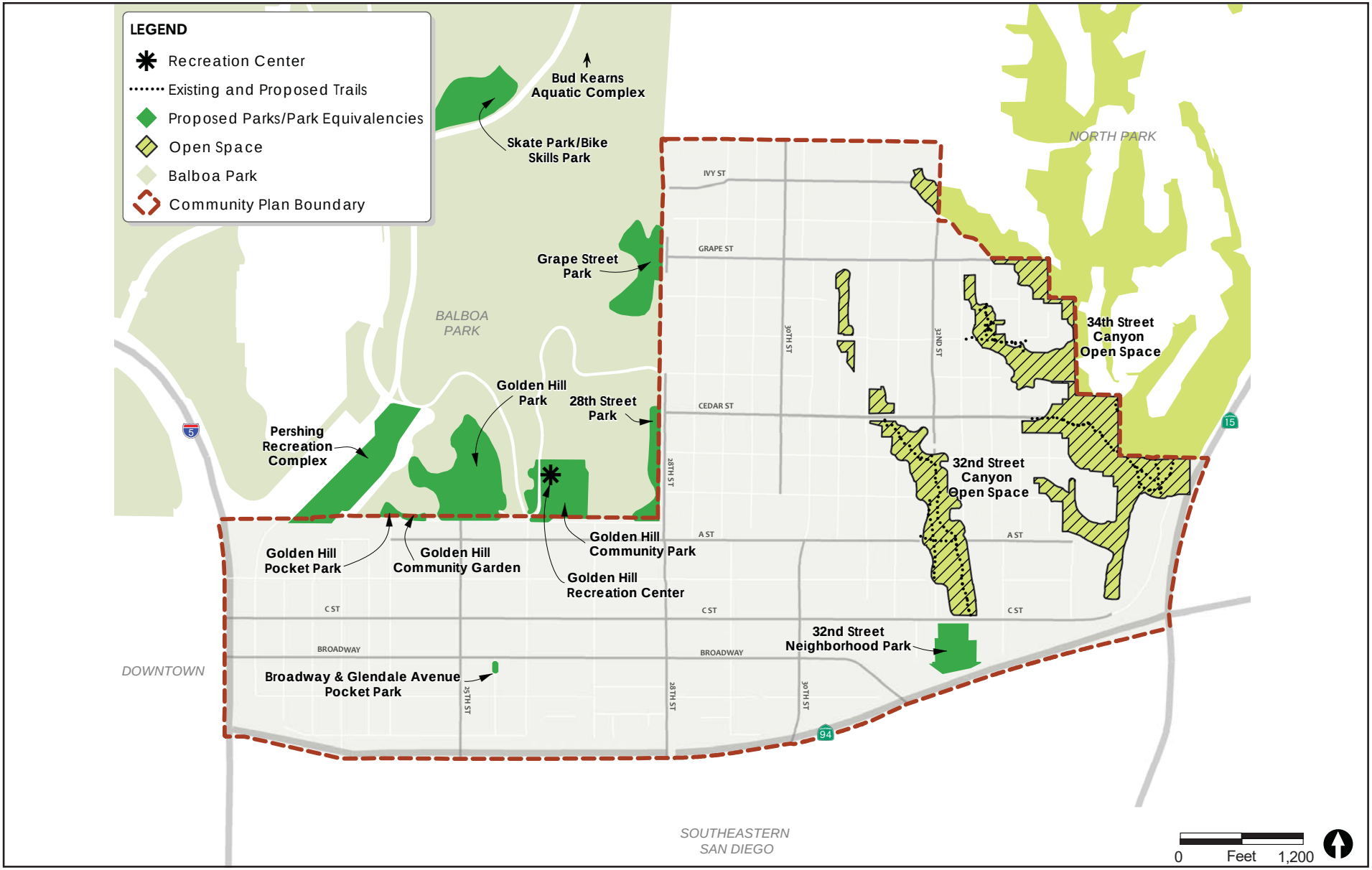


FIGURE 7.12-2

Parks, Recreation Facilities, and Open Space – Golden Hill

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c. Fire/Life Safety Protection

With the implementation of the proposed Golden Hill CPU and associated discretionary actions, there would be an increase in overall population which could result in a change in response times and the need for new or expanded fire/life safety facilities. However, future facilities would be planned based on adopted General Plan Public Facilities Element standards detailed in Chapter 5.0, Regulatory Framework (Section 5.12.1.3) of this PEIR. The proposed Golden Hill CPU and associated discretionary actions does not propose the construction of fire/life safety facilities. However the proposed Golden Hill CPU contains a policy framework that addresses fire facility needs and would support efforts to modernize and/or replace facilities and equipment to meet the needs of the community. Additionally, a new fire station is proposed at Home Avenue and 805/Fairmont in the City Heights community, which could supplement the existing service from Fire Station 11. As future development is proposed within the Golden Hill CPU area, individual projects would be subject to payment of DIF, which would provide facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for Golden Hill that will define applicable DIF fees for future development, including funding for fire facilities. At the programmatic level, the proposed increase in population would not require that the Fire-Rescue Department construct new facilities. Any expansion construction of existing facilities or the development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, at the program level of analysis provided in this PEIR, impacts associated with fire/life safety facilities would be less than significant.

d. Libraries

A number of libraries currently serve the Golden Hill community, although no library facility exists within the community boundaries. Correspondence with the City's Library Department (Appendix J) indicates that build-out of the proposed Golden Hill CPU and associated discretionary actions would not require construction of any additional facilities to meet library service requirements. Furthermore, proposed Golden Hill CPU includes a policy framework that addresses access and coordination related to availability of library facilities within the CPU area. The proposed Golden Hill CPU and associated discretionary actions does not include the construction of any library facilities. Thus, impacts related to library facilities would be less than significant.

e. Schools

Student generation is based on housing units. For the Golden Hill community, based on 2010 Census data from SANDAG, there are 7,285 existing units. An additional 1,610 residential units are proposed with the proposed Golden Hill CPU. Per correspondence with San Diego Unified School District in April 2014 (Appendix J), student generation rates vary based on the type of project, number of units, bedroom mix, affordable or senior housing component, proximity to schools and other amenities, neighborhood, and other factors. There are no district standard or school-specific rates.

Typically, to provide student generation rates for a new project, San Diego Unified School District demographers would research similar nearby developments and their student generation rates as a guide for how many students the new project may generate. For the proposed Golden Hill CPU and

associated discretionary actions, however, many factors are not yet determined, such as the specific type of housing and bedroom mix that may be constructed with the potential increase in housing stock at some future point in time. To estimate the number of students potentially generated by future build-out of the proposed Golden Hill CPU and associated discretionary actions, SDUSD demographers referenced the number of existing housing units in the Golden Hill community and the current number of students who reside in Golden Hill (based on District data), to determine the current community-wide student generation rates. This information is summarized in Table 7.12-3.

Table 7.12-3
Golden Hill Student Generation Rates from Existing Housing Units

Number of Existing Units	2013-2014 Students (K-5, 6-8, 9-12, and K-12 total)	Student Generation Rate (per unit)
7,285	K-5: 756	K-5: 0.104
	6-8: 328	6-8: 0.045
	9-12: 482	9-12: 0.066
	K-12: 1,566	K-12: 0.215

Based on the number of additional units proposed by the proposed Golden Hill CPU and associated discretionary actions and student generation rates included in Table 7.12-3, potential student generation for future build-out of Golden Hill is shown in Table 7.12-4. The generation rates are shown as a range. The current generation rate is the low range and the high range is double the low range (current generation rate). A key assumption is that future additional housing units will generate students at a rate similar to current housing units; this is represented by the low range. If future additional housing units are significantly different from the current units in terms of student generation, the number of students could be higher, as indicated by the high range.

Table 7.12-4
Golden Hill Potential Student Generation Rates from Future Additional Housing Units

Number of Additional Units	Number of Potential Students	Potential Student Generation Rates
1,610	K-5: 167-335	K-5: 0.104-0.208
	6-8: 73-145	6-8: 0.045-0.090
	9-12: 106-213	9-12: 0.066-0.132
	K-12: 346-693	**K-12: 0.215-0.430**

SDUSD demographers indicated that the cumulative potential increase in students from the number of future additional housing units suggested in the proposed Golden Hill CPU and associated discretionary actions would likely impact district schools to the point of reaching or exceeding capacity. Therefore, new or expanded school facilities would likely be needed.

Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. Senate Bill (SB) 50, enacted on August 27, 1998, significantly revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The

legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. The school district will be responsible for potential expansion or development of new facilities, which would undergo a separate environmental review when specific facilities are planned. Therefore, impacts to schools resulting from future development would be less than significant through implementation of Senate Bill 50 (City of San Diego 2011).

f. Maintenance of Public Facilities

The proposed Golden Hill CPU Public Services and Facilities Element contains a policy framework related to the maintenance of public facilities including undergrounding of overhead utilities and street light maintenance. As future development is proposed within the Golden Hill CPU area, individual projects would be subject to payment of DIF, which would provide facilities financing in accordance with Municipal Code Section 142.0640. The project includes a comprehensive update to the existing Impact Fee Study for Golden Hill that will define applicable DIF fees for future development. The proposed Golden Hill CPU and associated discretionary actions does not propose any construction of specific facilities. When future facilities are constructed they would require a separate environmental review. Thus, public facilities impacts would be less than significant.

Cumulative Impact Analysis

Some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve additional population. Therefore, it is anticipated that new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth occurring through infill and redevelopment as well as on remaining vacant and developable lands. However, as discussed in this section, implementation of the proposed Golden Hill CPU and associated discretionary actions does not include construction of any specific public facilities or services. The proposed CPU includes policies that would support improvements to public facilities and includes a proposed IFS as part of the project that would specify the DIF applicable to future development within the CPU area. Similarly, the proposed Golden Hill and Uptown CPUs do not propose specific facility improvements.

The specific public facilities improvements that would be constructed in the cumulative area of Uptown, Golden Hill and North Park and the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis. However, each future facility improvement would undergo a separate environmental review and are not intended to be analyzed for purposes of this proposed Golden Hill CPU. Thus, cumulative impacts related to public facilities would be less than significant.

7.12.4 Significance of Impacts

Regarding police protection, the proposed Golden Hill CPU and associated discretionary actions does not include construction of new police facilities. As population growth occurs and the need for

new facilities is identified, any future construction of police facilities would be subject to a separate environmental review at the time design plans are available. Therefore, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in less than significant environmental impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services, and no mitigation is required.

Regarding park and recreational facilities, there is an existing and projected deficit in population-based parks, which is an adverse impact, but not considered significant at the program level. Implementation of the proposed Golden Hill CPU and associated discretionary actions would provide policy support for increasing the acreage of population based parks in the CPU area, but does not propose construction of new facilities. Thus, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant impact related to parks and recreation, and no mitigation is required.

Regarding fire/life safety protection, implementation of the proposed Golden Hill CPU and associated discretionary actions would result in an increase in overall population which could result in a change in fire-rescue response times and demand for new or expanded facilities. However, expansion of existing facilities or construction of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, impacts associated with police/life safety facilities would be less than significant, and no mitigation is required.

The proposed Golden Hill CPU and associated discretionary actions does not include construction of library facilities. Development of any new facility would be subject to separate environmental review at the time design plans are available. Therefore, impacts related to library facilities would be less than significant, and no mitigation is required.

Regarding school facilities, future residential development that occurs in accordance with the proposed Golden Hill CPU and associated discretionary actions would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill 50 to mitigate any potential impact on district schools. The City is legally prohibited from imposing any additional mitigation related to school facilities through implementation of Senate Bill 50, and the school district would be responsible for potential expansion or development of new facilities. Therefore, impacts to schools would be less than significant, and no mitigation is required.

The proposed Golden Hill CPU contains policies to address the maintenance and improvement of public facilities. Impacts would therefore be less than significant, and no mitigation is required.

7.12.5 Mitigation Measures

No mitigation is required for police protection, parks and recreation facilities, fire services, library services, schools, and maintenance of public facilities. While the implementation of the proposed Golden Hill CPU and associated discretionary actions would result in the continuation of a park deficit, which is an adverse impact it is less than significant. No mitigation is required

7.13 Public Utilities

This section analyzes the impacts of the proposed Golden Hill Community Plan Update (CPU) and associated discretionary actions on existing public utilities systems, including those for water, sewer, storm water, communications, solid waste, and energy.

7.13.1 Existing Conditions

A discussion of existing conditions for water supply, sewer, storm water, solid waste, energy, and communications in the Golden Hill CPU area is provided in Chapter 2.0. The existing regulatory framework is summarized in Chapter 5.0. Specific discussion relating to the water supply assessment for Golden Hill is presented below. Additional information and analysis relative to drainage and storm water are also provided in Section 7.11.

7.13.1.1 Water Supply

a. PUD Water Supply Assessment and Verification

The City's Public Utilities Department (PUD) prepared a Water Supply Assessment (WSA) report for the proposed Golden Hill CPU and associated discretionary actions (May 2015), which is included as Appendix K-2 to this draft Program Environmental Impact Report (PEIR). The WSA was prepared for the proposed Golden Hill CPU and associated discretionary actions to assess whether sufficient water supplies are, or will be, available to meet the projected water demands associated with both of the land use scenarios proposed. Because no subdivision of land is proposed as part of this project, this WSA was prepared in compliance with the requirements of Senate Bill 610. The WSA includes, among other information, identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the proposed Golden Hill CPU and associated discretionary actions; and quantities of water received in prior years pursuant to those entitlement, rights, contracts, and agreements.

7.13.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed Golden Hill CPU and associated discretionary actions, impacts related to water, sewer, solid waste, energy, and communications would be significant if the proposed Golden Hill CPU and associated discretionary actions would:

1) Result in the use of excessive amounts of water beyond projected available supplies;
2) Promote growth patterns resulting in the need for and/or provision of new or physically

altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives;

3) Result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan.

7.13.3 Impact Analysis

Issue 1 Water Supply

Would the project use excessive amounts of water beyond projected available supplies?

The WSA evaluated water supplies that are, or will be, available during a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated demands of the proposed Golden Hill CPU and associated discretionary actions.

In addition, Metropolitan Water District (MWD) and the San Diego County Water Authority (Water Authority) have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. MWD's Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP), the Water Authority's 2010 UWMP and annual water supply report, include water infrastructure projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water.

Based on a normal water supply year, the estimated water supply projected in five-year increments for a 20-year projection will meet the City's projected water demand of 240,472 acre-feet in 2015; 260,211 acre-feet in 2020; 276,375 acre-feet in 2025; 288,481 acre-feet in 2030; and 298,860 acre-feet in 2035. Based on a single-dry year forecast, the estimated water supply will meet the projected water demand of 255,040 acre-feet in 2015; 276,526 acre-feet in 2020; 293,895 acre-feet in 2025; 307,230 acre-feet in 2030; and 318,586 acre-feet in 2035. Based on a multiple-dry year, third year supply, the estimated water supply will meet the projected demands of 281,466 acre-feet in 2015; 303,004 acre-feet in 2020; 322,166 acre-feet in 2025; 334,720 acre-feet in 2030; and 346,823 acre-feet in 2035.

As demonstrated in the WSA (Appendix K-2 to this PEIR), using the City's draft Urban Water Management Plan (UWMP) and Water Authority's 2010 UWMP, which are based on the San Diego Association of Governments (SANDAG) Series 12 forecast, there is sufficient water planned to supply the proposed Golden Hill CPU and associated discretionary actions estimated annual average usage. The projected water demands of the project are 2,105,081 gallons per day (gpd) or 2,358 acre-feet per year (AFY). In the City's 2010 UWMP, the planned water demands of this project site are 2,333,339 gpd or 2,613 AFY. As a result, the water demand resulting from the proposed Golden Hill CPU and associated discretionary actions would not result in unforeseen demands.

In summary, the WSA concluded that the proposed Golden Hill CPU and associated discretionary actions are consistent with the water demands assumptions included in the regional water resource planning documents of the Water Authority and MWD. Current and future water supplies, as well as

the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the Water Authority, and MWD to serve the projected demands of the proposed Golden Hill CPU area, in addition to existing and planned future water demand of the PUD. In addition, no construction or expansion of water supply facilities is proposed in conjunction with the proposed Golden Hill CPU and associated discretionary actions. Therefore, impacts related to water supply would be less than significant.

Issue 2 Utilities

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

The City's General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the proposed Golden Hill CPU and associated discretionary actions would result in infill and redevelopment occurring in selected areas within the proposed Golden Hill CPU area, as stated within the proposed Golden Hill CPU. The City's existing built areas are currently served by storm water, wastewater, and water infrastructure, and various communications systems; however, some of the City's built areas, including those within the Golden Hill community, have existing infrastructure deficiencies and would require capacity improvements to serve the existing and projected population. The following is a program-level analysis of the significance of impacts under California Environmental Quality Act (CEQA) for each applicable utility.

a. Storm Water

Because the Golden Hill CPU area is highly impervious, the volume or rates of runoff are not likely to be increased by new development. It is more likely that the volume and rate of runoff could be slightly decreased due to new storm water quality regulations, which require implementation of LID practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation.

No storm drains, or other community-wide drainage facilities, are proposed for construction in conjunction with adoption of the proposed Golden Hill CPU and associated discretionary actions. However, plans and programs are in place Citywide to maintain and upgrade the storm water system. As individual development projects are implemented in accordance with the proposed Golden Hill CPU and associated discretionary actions, localized improvements to the storm water system would be required as part of the project design and review. All storm water facilities constructed in conjunction with future development would be reviewed for consistency with the City's Storm Water Standards and other applicable requirements.

All future projects would be required to adhere General Plan and proposed Golden Hill CPU policies and implementing regulations, and are required to comply with the City's Storm Water Standards. Proposed Golden Hill CPU policies include those implementing Best Management Practices (BMPs) and Low Impact Development (LID) strategies to manage storm water and urban runoff, as well as those promoting proper maintenance of existing storm water infrastructure, thus reducing potential strains on the City's storm water system and ensuring the long-term viability of existing facilities. While the details of storm water infrastructure improvements would depend on the actual design of

a future project, strict adherence to existing storm water regulations, conformance with General Plan and proposed Golden Hill CPU policies, and project-specific review under CEQA for discretionary projects would assure that significant adverse effects to the City's storm water system, as well as significant impacts associated with the installation of new storm water infrastructure, would be avoided.

b. Sewer

The proposed Golden Hill CPU and associated discretionary actions are a program-level document and does not propose any specific projects. Furthermore, no new sewer collection or wastewater treatment facilities are proposed in conjunction with the proposed Golden Hill CPU and associated discretionary actions. Any future development would be required to comply with the City's Municipal Code regulations regarding sewers and wastewater facilities (Chapter 6, Article 4) and would be expected to follow the City's Sewer Design Guidelines. Adherence to existing regulations and standards would ensure that flows from new projects would not adversely affect downstream conveyance systems and that previous studies have accounted for those flows in the design of the downstream conveyance system.

Given ongoing and planned improvements to the system, existing regulations and guidelines to ensure adequate capacity, and proposed Golden Hill CPU policies to support capital improvements, impacts associated with the wastewater system would be less than significant, and no mitigation is required.

c. Water Distribution

The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's Capital Improvements Program. These improvements are determined based on continued monitoring by the Public Works Department (PWD) Engineering Division to determine remaining levels of capacity. The PWD Engineering Division plans its capital improvement projects several years prior to pipelines actually reaching capacity. Such improvements would be required of the water system regardless of the implementation of the proposed Golden Hill CPU and associated discretionary actions.

As future development takes place in the Golden Hill CPU area, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines and mains. This would be reviewed on a project-by-project basis. Additionally, the proposed Golden Hill CPU contains policies supporting water conservation and water-wise practices. All proposed public water facilities would be required to be designed and constructed in accordance with established criteria in the City's Water Facility Design Guidelines, Land Development Code, and any other applicable regulations, standards, or practices. Future development under the proposed Golden Hill CPU and associated discretionary actions would be generally consistent with the existing urban growth patterns and the necessary infrastructure improvements to the water system would be consistent with what is necessary for new development and to maintain the existing system. The proposed Golden Hill CPU contains a policy (PF-1.12) to support the systematic improvement and gradual replacement of water facilities.

Given that future improvements to water facilities in accordance with the proposed Golden Hill CPU would be consistent with existing development and capital improvements planning, would be consistent with planned water supplies and demands, and would comply with existing guidelines and regulations and proposed Golden Hill CPU policies, the impact would be less than significant.

d. Communications

Private utility companies currently provide communications systems within the Golden Hill CPU area. Future siting of communications infrastructure would be in accordance with the Land Development Code, including section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts. Adhering to General Plan policies supporting the City's undergrounding program would also ensure that visual impacts of new facilities are minimized. Similarly, the proposed Golden Hill CPU contains policies supporting utility undergrounding and undergrounding is currently underway in the Golden Hill community. Any construction of communications systems associated with future development would occur in accordance with the City's permitting processes and construction standards to avoid or minimize impacts on environmentally sensitive habitat areas and landforms through siting, grading or excavation, and erosion. Thereby, impacts associated with communications facilities from build-out of the Golden Hill CPU would be less than significant.

Issue 3 Solid Waste and Recycling

Would the proposed project result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan?

The California Department of Resources Recycling and Recovery (CalRecycle) provides estimates of solid waste generation rates for different types of land uses. These rates estimate the amount of solid waste generated by residences or businesses over a certain amount of time (day, year, etc.). Waste generation rates include all materials discarded, whether or not they are later recycled or disposed of in a landfill, since under State law the total amount of waste "generated" is considered to be the sum of the waste "disposed" plus the waste "diverted" from disposal. Waste generation rates can be used to estimate the impact of new development on the local solid waste infrastructure, although it should be noted that impacts to solid waste infrastructure are not necessarily the amount of waste, but whether any increase would require the development of new facilities. Since the majority of waste is managed through waste diversion, solid waste facilities include those necessary to provide composting, recycling, and other collection, separation, and diversion services. Furthermore, it is specifically the amount of waste remaining for disposal that is considered for compliance with the City's Climate Action Plan and has the greatest potential for impacts associated with greenhouse gas emissions.

Future projects that could occur in the Golden Hill community with the implementation of the proposed Golden Hill CPU and associated discretionary actions would be required to comply with City regulations, including the City's Recycling Ordinance (updated July 2015). In addition, a Waste Management Plan (WMP) would be required for any project that exceeds the City's threshold, currently the generation of 60 or more tons of solid waste for projects of 40,000 square feet or

more. The City also has an ordinance requiring the provision of sufficient interior and exterior storage space for refuse and recyclable materials (Section 142.0801 et seq. of the Land Development Code). Additionally, most development projects must comply with the City's Construction and Demolition Ordinance. These ordinances, and development of WMPs will impose new burdens on City and private diversion infrastructure, such as the composting operation at the Miramar Landfill and privately-operated materials recovery facilities, and are intended to help divert solid waste from the region's landfills, including the privately operated Sycamore and Otay landfills, and the City's Miramar Landfill, to preserve capacity, and to support the 75 percent waste diversion goals established by AB 341 and the City's Climate Action Plan. The General Plan addresses waste management in Policies PF-I.1 through PF-I.5, focusing on waste diversion in PF-I.2. The City has adopted a Zero Waste Plan, which targets 75 percent waste diversion by 2020, 90 percent waste diversion by 2035 and 100 percent diversion by 2040. Although compliance with existing ordinances is not sufficient to achieve these targets, and existing recycling infrastructure is not sufficient to accommodate future increases in organics diversion required by AB 1862, the development of Waste Management Plans allows flexibility to require site-specific measures to reduce waste.

All future development would be required to participate in the above-mentioned programs and comply with City General Plan requirements, along with the C&D and Recycling ordinances. Doing so would avoid significant solid waste disposal impacts related to the construction and operation of future development consistent with build-out of the proposed Golden Hill CPU and associated discretionary actions. Therefore, at this program-level of review, the proposed Golden Hill CPU and associated discretionary actions would not require increased landfill capacity, and impacts associated with solid waste would be less than significant. Should new solid waste, recycling or compost facilities be required to be constructed in the future, each would undergo site-specific analysis to evaluate impacts, as needed.

Cumulative Impacts

Water Supply

The water supply assessment (WSA) prepared for the proposed Golden Hill CPU and associated discretionary actions concluded that the proposed Golden Hill CPU and associated discretionary actions would be consistent with the water demand assumptions included in the regional water resource planning documents of the Water Authority and the MWD. Furthermore, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PWD, the Water Authority, and MWD to serve the projected demands of the proposed Golden Hill CPU area, in addition to existing and planned future water demand of the City. Additionally, the proposed Golden Hill CPU contains policies intended to ensure that no excessive water use takes place, encourage water conservation and reclamation, and ensure the continued operability of existing infrastructure. No cumulative impact exists; therefore, no cumulatively significant impact would occur from the proposed Golden Hill CPU and associated discretionary actions.

Utilities

No significant cumulative impacts related to public utility infrastructure including storm water, water, wastewater, and solid waste systems/facilities would result from build-out of the proposed Golden Hill CPU and associated discretionary actions. This conclusion is based on required conformance with the City General Plan and CEQA processes for applicable development projects. Implementation of the General Plan and proposed Golden Hill CPU policies and compliance with federal, State, and local regulations would preclude incremental impacts associated with new construction of, or improvements to, public utilities infrastructure. The proposed Golden Hill CPU and associated discretionary actions does not propose improvements to storm water, water or wastewater infrastructure or communication systems. At the program-level, no associated significant impacts would result from implementation of the proposed Golden Hill CPU and associated discretionary actions, based on mandatory compliance with City standards for the design, construction, and operation of storm water, water and wastewater infrastructure (including environmental review). Similarly, other development of land uses in surrounding communities would be required to comply with the same regulatory framework. As a result, the proposed Golden Hill CPU and associated discretionary actions would result in a less than significant cumulative impact associated with storm water, water, wastewater, and communication systems.

Solid Waste

The proposed Golden Hill CPU and associated discretionary actions would generate solid waste through demolition/construction and ongoing operations. When evaluated in conjunction with past, present, and future projects, build-out of the proposed Golden Hill CPU and associated discretionary actions would increase the amount of solid waste generated within the region. Future projects under the proposed Golden Hill CPU and associated discretionary actions would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with the Municipal Code and consistency with the General Plan and proposed Golden Hill CPU policies promoting waste diversion would serve to preserve solid waste capacity. Discretionary projects generating more than 60 tons of waste would be required to develop and implement WMAs targeting 75 percent waste diversion. Therefore, there would be no cumulatively significant impact to solid waste disposal resulting from the proposed Golden Hill CPU and associated discretionary actions.

7.13.4 Significance of Impacts

Issue 1 Water Supply

Based on the findings of the WSA, there is sufficient water supply to serve existing and projected demands of the proposed Golden Hill CPU and associated discretionary actions, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Therefore, impacts of the proposed Golden Hill CPU and associated discretionary actions on water supply would be less than significant.

Issue 2 Utilities

a. Storm water

Future projects would be required to exercise strict adherence to existing storm water regulations and conformance with General Plan and Golden Hill CPU policies. Project-specific review under CEQA would assure that significant adverse effects to the City's storm water system, as well as significant impacts associated with the installation of new storm water infrastructure, would be avoided.

b. Sewer and Water Distribution

The proposed Golden Hill CPU acknowledges that upgrades to sewer lines are an ongoing process. These upgrades are administered by the PWD and are handled on project-by-project basis. Because future development of properties with the proposed Golden Hill CPU and associated discretionary actions will likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. The proposed Golden Hill CPU takes into consideration the existing patterns of development, and the update is a response to the community's needs and goals for the future. The necessary infrastructure improvements to the storm water, wastewater, and water infrastructure would be standard practice for new development to maintain or improve the existing system in adherence to sewer and water regulations and conformance with General Plan and proposed Golden Hill CPU policies. Additionally, future discretionary projects would be required to undergo project-specific review under CEQA that would assure that impacts associated with the installation of storm water infrastructure would be reduced to below a level of significance. Therefore, impacts to sewer and water utilities would be less than significant.

c. Communications

Given the number of private utility providers available to serve the proposed Golden Hill CPU area, there is capacity to serve the area. Impacts would be less than significant.

Issue 3 Solid Waste and Recycling

To ensure waste diversion and recycling efforts during construction and post-construction future land use occupancy and operation (i.e., residential, commercial, industrial, mixed-use, etc.) are addressed, a WMP shall be prepared for any discretionary project proposed under the proposed Golden Hill CPU and associated discretionary actions exceeding the threshold of 40,000 square feet or more. Implementation of these WMPs would ensure that future development project impacts would be considered less than significant. Non-discretionary projects proposed under the proposed Golden Hill CPU and associated discretionary actions, and discretionary projects that fall below the 60 ton threshold, would be required to comply with applicable San Diego Municipal Code sections addressing construction and demolition debris, waste and recyclable materials storage, and recyclable materials (and, in the future, organic materials) collection. Therefore, at this program-level of review, the proposed Golden Hill CPU and associated discretionary actions would not require increased landfill capacity, and impacts associated with solid waste would be less than significant.

7.14 Health and Safety

This section describes potential human health and public safety issues related to the presence of hazardous materials and other hazards within the North Park CPU area, identifies pertinent regulatory standards, and evaluates potential impacts and associated mitigation requirements related to implementation of the proposed North Park CPU and associated discretionary actions. KLR Planning conducted GeoTracker search (May 2016) for schools within the proposed Golden Hill CPU area. The results of that search are included in Appendix L of this PEIR. Additionally, KLR Planning conducted a Cal EPA search (May 2016) of Cortese List Data Resources, the results of which are included in this section as Table 7.14-1.

7.14.1 Existing Conditions

The existing environmental setting and regulatory framework, as they pertain to health and safety issues, are summarized in Chapters 2.0 and 5.0, respectively. The following paragraphs discuss health and safety issues which are specific to the Golden Hill CPU.

a. Hazardous Materials Sites

A search of Federal, State, and local environmental regulatory agency databases was conducted in order to identify sites within the Golden Hill community that may have been impacted by hazardous materials or wastes. The search identified 16 documented release cases within Golden Hill, all of which are closed (Table 7.14-1). All of the identified sites are/were the site of either LUSTs or a cleanup program. Leaking underground storage tank systems pose a significant threat to groundwater quality in the United States. Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of "non-federally owned" sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred.

Sites in the program are varied and include, but are not limited to, pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, and some brownfields. These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are plentiful and diverse and include solvents, pesticides, heavy metals, and fuel constituents to name a few. Properties with open cases represent a moderate to high risk of encountering impact during potential future redevelopment. Closed release cases represent a low to moderate risk of encountering impact during potential future redevelopment. However, cases which were closed in the 1990s may not meet current standards and may require additional investigation and/or remediation prior to redevelopment.

Table 7.14-1 Hazardous Materials Sites in Golden Hill			
Site	Address	Program/Site Type	Status
You Are Here, LLC	811 25th Street	Cleanup Program Site	Closed
Texaco Inc AT0050	3101 Juniper Street	Cleanup Program Site	Closed
E.R. Bourne Trust	2225 30th Street	LUST	Closed
E.R. Bourne Trust	2211 30th Street	LUST	Closed
Custom Masonry Inc	2206 30th Street	LUST	Closed
7-Eleven Food Store #19628	2101 Fern Street	LUST	Closed
7-Eleven Food Store #19628	2101 Fern Street	Cleanup Program Site	Closed
Foster	3031 Date Street	LUST	Closed
Conocophillips	2604 B Street	LUST	Closed
SDCTY-Central Operations	1970 B Street	Cleanup Program Site	Closed
Bonanza Corvette	1601 C Street	Cleanup Program	Closed
Bills Taxi Repair Service	2504 C Street	LUST	Closed
SDCTY-Fire Station #11	945 25th Street	Cleanup Program Site	Closed
Broadway Center LL	2475 Broadway	Cleanup Program Site	Closed
Rose Mendell	2496 Broadway	LUST	Closed
Shell Service Station	2484 F Street	LUST	Closed

b. Aircraft Hazards

The State requires that the San Diego County Regional Airport Authority Board, as the ALUC, prepare an ALUCP for each public-use airport and military air installation in San Diego County. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, over flight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area for each airport over a 20-year horizon. The City of San Diego implements the adopted ALUCPs with the AEOZ. The City has agreed to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations until the ALUC determines that the City's land use plans are consistent with the ALUCPs. San Diego International Airport is located adjacent to the Golden Hill CPU area. San Diego International Airport provides commuter, domestic, and international air transportation.

7.14.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed Golden Hill CPU and associated discretionary actions, a significant health and safety impact would occur if implementation of the proposed Golden Hill CPU and associated discretionary actions would:

1) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands;

2) Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;

3) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;

4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment;

5) Expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operational accidents.

7.14.3 Impact Analysis

Issue 1 Wildfire Hazards

Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The City of San Diego receives limited precipitation; therefore, the potential for wildland fires represents a hazard, particularly on undeveloped properties or where development exists (or would potentially existing in the future) adjacent to open space or within close proximity to wildland fuels. As the proposed Golden Hill CPU and associated discretionary actions would maintain natural open space within undeveloped canyons, any development adjacent to this open space would be subject to a risk of fire hazards. Existing City policies and regulations would help reduce, but not eliminate, risks from wildfires. The City's General Plan contains goals to be implemented by the City's Fire-Rescue Department, and sustainable development and other measures aimed at reducing the risks of wildfires.

The proposed Golden Hill CPU Public Facilities, Services and Safety Element includes policies intended to reduce the risk of wildfire hazards. Policies are included that prioritize the maintenance of a high level of fire protection throughout the community, particularly in the neighborhoods adjacent to natural open space and emphasizes modernization and/or replacement of facilities and equipment to meet the needs of the community or as new fire-fighting technology becomes available. Policies would also support efforts by the City to educate and inform the community regarding fire prevention techniques, particularly those related to brush management and wildland fires.

Regulations regarding brush management are summarized in Chapter 5.0, Regulatory Framework (Section 5.14) of this PEIR. Future development proposals would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards, including brush management regulations. Impacts due to wildland fires would be less than significant and no mitigation is required.

Issue 2 Schools

Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

A GeoTracker search was undertaken (May 2016) to determine what, if any, exposure to hazardous materials occurs within one-quarter-mile of the existing schools. Three schools are located within the Golden Hill community:

- McGill School of Success (TK-4) located at 3025 Fir Street
- Einstein Academy (K-5) located at 3035 Ash Street
- Golden Hill Elementary (K-5) located at 1240 33rd Street

The GeoTracker search resulted in zero identified sites with potential hazards located within one-quarter mile of a school. Additionally, in accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at such sites until a "no further action" clearance letter from the County DEH, or similar determination is issued by the City's Fire Rescue Department, DTSC, RWQCB, or other responsible agency. The current regulatory environment of City, state, and federal requirements provides a high level of protection from new hazardous uses that may be sited near schools or other sensitive receptors. Additionally, existing conditions in the Golden Hill CPU area show no conflict between existing school sites and open hazardous materials sites. Therefore, the impact would be less than significant.

Issue 3 Emergency Evacuation and Response Plans

Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

There are no objectives or policies contained in the proposed Golden Hill CPU and associated discretionary actions that would interfere with or impair implementation of an adopted emergency response or evacuation plan. The *Unified San Diego County Emergency Services Organization Operational Area Emergency Plan, Annex Q, Evacuation* (County of San Diego 2007) identifies a broad range of potential hazards and a response plan for public protection. The plan identifies major interstates and highways within the County as primary transportation routes for evacuation. The land uses identified in the proposed Golden Hill CPU would not physically interfere with any known adopted emergency plans. Improved roadway and transportation modifications discussed in Section 8.3, *Transportation/Traffic Circulation/Parking*, would directly help traffic flow and evacuation time.

The City will continue to make regular modifications to the Multi-Hazard Functional Plan and EOC as hazards, threats, population and land use, or other factors change to ensure impacts to emergency response plans are less than significant (City of San Diego 2008). Impacts to emergency response plans as a result of implementation of the proposed Golden Hill CPU and associated discretionary actions would be less than significant.

Issue 4 Hazardous Materials Sites and Health Hazards

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment?

Hazardous materials are typically utilized by land uses such as industrial, retail/office, commercial, residential, agriculture, medical, and recreational uses, among other activities. According to a search of Federal, State, and local regulatory databases, zero documented hazardous material release cases were identified within Golden Hill. Therefore, there is no risk of development of sites with existing contamination in accordance with the proposed Golden Hill CPU and associated discretionary actions.

Should hazardous materials be discovered at a later time, Federal and State regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. In accordance with local City and County, State, and Federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted at such locations until a "no further action" clearance letter from the County DEH, or similar determination is issued by the City's Fire Rescue Department, DTSC, RWQCB, or other responsible agency.

Because Golden Hill does not historically have a large quantity of hazardous materials sites, and because the proposed Land Use Plan does not demonstrate a significant increase in land uses that have potential to be hazardous materials sites, there are no policies in the proposed Golden Hill CPU relative to hazardous materials. However, the General Plan includes policies to protect the health, safety and welfare of residents relating to industrial land uses, documentation of hazardous materials investigations, and requiring soil remediation in land use changes from industrial or heavy commercial to residential or mixed residential development. Therefore, impacts related to hazardous materials sites and health hazards would less than significant.

Issue 5 Aircraft Related Hazards

Would the project expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operational accidents?

As concluded in Section 7.1 Land Use of this PEIR, impacts relative to safety hazards for people residing in or working in a designated airport influence area would be less than significant. Additionally, there are no private heliport facilities within the Golden Hill CPU area. Thus, impacts related to exposure of people or structures to aircraft hazards would be less than significant.

Cumulative Impact Analysis

As discussed in this section, compliance with Federal, State, regional, and local health and safety laws and regulations would address potential health and safety impacts. Potential health and safety impacts associated with wildfire, hazardous substances, emergency response and evacuation plans,

and aircraft hazards would not combine to create cumulative impacts when viewed together with the potential growth that could occur within the Golden Hill, North Park, and Uptown CPUs. Wildlife impacts in these communities are limited to the canyon areas which are localized and would not be exacerbated by cumulative development in adjacent communities. Additionally, future projects implemented in accordance with the CPUs are required to follow the City's Brush Management regulations and the City and Fire Code requirements. Similarly, potential hazards associated with hazardous material sites are site specific and would not combine with hazards in other CPU areas to create a cumulative impact. In addition, Therefore, implementation of the proposed Golden Hill CPU would not result in a cumulatively significant impact related to health and safety issues.

7.14.4 Significance of Impacts

Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan and proposed Golden Hill CPU contain goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards. Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazard would be less than significant.

The proposed Golden Hill CPU and associated discretionary actions would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of any existing or proposed school. Impacts to schools would be less than significant. No mitigation is required.

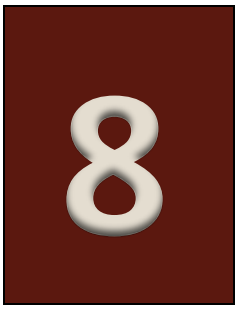
The proposed Golden Hill CPU and associated discretionary actions would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; therefore, impacts are less than significant, and no mitigation would be required.

There are no hazardous material release case sites within the Golden Hill community; therefore, no impacts would result. Should hazardous materials release sites be encountered in the future, there are local, State, and Federal regulations and programs in places that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites and no mitigation is required.

Impacts relative to safety hazards related to being located within an airport influence area less than significant. No mitigation is required.

7.14.5 Mitigation Framework

All impacts related to health and safety would be less than significant; thus, no mitigation is required.



Chapter 8
Effects Found Not to be Significant

California Environmental Quality Act (CEQA) Guidelines §15128 requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and therefore would not be discussed in detail in the EIR. The environmental issues not expected to have a significant impact as a result of the proposed Community Plan Updates (CPUs) are Agricultural Resources, Mineral Resources, and Population and Housing.

8.1 Agricultural Resources

8.1.1 Farmland Mapping and Monitoring Program

Based on the farmland maps prepared by the California Department of Conservation (2010), the CPU areas are not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The two CPU areas are located within an urbanized area where there are no existing agricultural lands or agricultural uses. Therefore there would be no impact to prime farmland, unique farmland, or farmland of statewide importance.

8.1.2 Agricultural Zoning/Williamson Act

The CPU areas are not zoned for agriculture and there are no lands under a Williamson Act contract. Therefore, no impact is identified for this issue area.

8.1.3 Forest, Timberland, Timberland Production Zone

The two CPUs are located within an urbanized area. There are no existing forestlands, timberlands, or timberland zoned Timberland Production, either within the Community Plan areas or in the

immediate vicinity, that would conflict with existing zoning or the proposed rezoning (Forest Service, 2007). Therefore, no impact is identified for this issue area.

8.1.4 Loss of Forest Land

The proposed CPU areas are located within an urbanized area. There are no existing forestlands either within the proposed Community Plan areas or in the immediate vicinity (ESRI 2008). The implementation of proposed CPUs and associated discretionary actions would not result in the loss of forestland or conversion of forestland to non-forest use. Therefore, no impact is identified for this issue area.

8.1.5 Natural Conversion of Farmland or Forest

The proposed CPU areas are located within an urbanized area; there are no existing agricultural and forestland uses either on-site or in the immediate vicinity (Forest Service, 2007). The implementation of proposed CPUs would not involve any other changes that could result in conversion of farmland to non-agricultural use (i.e., increase population), or conversion of forestland to non-forest use. Therefore, no impact is identified for this issue area.

8.2 Mineral Resources

According to the California Department of Conservation (CDC), Division of Mines and Geology, areas of the two proposed CPUs are designated with one Mineral Land Classification, as follows:

MRZ-3: MRZ-3 designated lands are areas containing mineral deposits the significance of which cannot be evaluated from available data (CDC, 1996).

According to the California Geological Survey Open File Report 96-04, areas mapped as Mineral Resource Zone 1, 2, 3, and 4 (MRZ-1 through MRZ-4) have been mapped for the City of San Diego. MRZ-1 areas are locations in San Diego County that have been identified as having no significant mineral deposits. Areas mapped in MRZ-2 are considered to have extractable aggregate deposits. Areas mapped in MRZ-3 contain mineral deposits that may qualify as mineral resources. MRZ-4 areas are those where geologic information does not rule out either the presence or absence of mineral resources. Based on a review of referenced data, the proposed CPU areas are in an urban area where the potential for loss of mineral deposits due to further development is considered low (CDC, 2010).

In addition, the proposed CPU areas are located entirely within a developed urban area and do not require the acquisition of additional land. Furthermore, the buildout of the proposed CPUs would not result in a loss of availability of a locally important mineral resource recovery site delineated on any local or general plan. There are no identified mineral resources that would be affected or "lost" as a result of the proposed CPUs. Therefore, no impact is identified for this issue area.

8.3 Population and Housing

While population projections for the CPU areas, identified in Table 3-12 of the Project Description, indicate that population will increase over time, the population growth would not introduce an impact. The proposed CPUs would serve as a comprehensive, long-term plan for the physical development of the CPU areas, and are intended to manage and address future growth in the CPU areas.

The proposed CPUs would allow for and encourage in some instances redevelopment of existing housing to accommodate higher density residential use or mixed-use development. For example, the North Park CPU would encourage the redevelopment of multi-family units built from the 1960s through the 1980s (Residential Infill Policy LU-4.20). While the proposed CPUs do not propose any specific development at this time, future build-out of the CPUs could result in displacement of existing housing and people when residential structures are targeted for redevelopment. However, any displaced housing would be replaced by higher density housing on the same site and thus, would not require the construction of replacement housing elsewhere. Ultimately, the amount of housing ~~not displace people or existing housing; the number of residential units in the CPU areas~~ would increase as a result of the proposed CPUs and implementation of the CPUs would~~,~~ accommodate~~ating~~ population growth within the exiting urban setting. ~~and any displacement, therefore no impact would occur for this issue area.~~ Thus, the project would have no environmental impact associated with construction of replacement housing elsewhere since future development that would displace housing or residents would result in redevelopment of higher density housing on the same site, avoiding potentially significant impacts associate with construction of replacement housing elsewhere.



Chapter 9
Growth Inducement

This Program Environmental Impact Report (PEIR) must examine the potential growth-inducing impacts of the proposed North Park and Golden Hill CPUs. More specifically, California Environmental Quality Act (CEQA) Guidelines Section 15126.2(d) requires that an Environmental Impact Report:

> Discuss 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. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

According to the City's Significance Determination Thresholds, growth inducement "is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly which may result in the construction of major new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment." In addition, the Thresholds state that "the analysis must avoid speculation and focus on probable growth patterns or projects."

The General Plan PEIR (2008c) notes that "population in San Diego will grow whether or not the Draft General Plan is adopted…" and although a number of the General Plan policies are in place to "…encourage business, education, employment and workforce development…preserve and protect valuable employment land, especially prime industrial land, from conversion to other uses…and

facilitate expansion and new growth of high quality employment opportunities in the City." The General Plan incorporates the previously adopted City of Villages strategy, which notes that a "village" is a place where residential, commercial, employment, and civic uses are present and integrated, and are characterized by compact mixed-use area, that are pedestrian-friendly and linked to the regional transit system (City of San Diego 2008a). Based on Government Code Section 65300, the General Plan serves as a comprehensive, long-term plan for physical development of the City and, by definition, is intended to manage and address future growth in the City. Implementation of the City of Villages strategy relies on the future designation and development village sites through comprehensive community plan updates.

Population in the City, as well as the proposed North Park and Golden Hill Community Plan Update (CPU) areas, is projected to grow under the current adopted community plans, as well as under the land use plans for the proposed North Park and Golden Hill CPUs. In accordance with the framework and policies in the General Plan, future population growth would be accommodated primarily in existing urbanized areas, such as the proposed North Park and Golden Hill CPU areas. As discussed in the Project Description, there is a current estimate of 46,420 residents in the North Park CPU area, and 15,800 residents in the Golden Hill CPU area (Table 3-12). By the year 2035, this population is projected to increase to 73,170 residents in the North Park CPU area, and 24,010 residents in the Golden Hill CPU area. The proposed North Park and Golden Hill CPUs serve as a comprehensive, long-term plan for the physical development of the CPU areas, and are intended to manage and address future growth in the North Park and Golden Hill CPU areas.

The proposed North Park CPU incorporates the City of Villages Strategy by designating a Community Village along University Avenue and 30th Street, and two neighborhood villages; one along Park Boulevard and Adams Avenue, and one along Adams Avenue near 30th. The proposed Golden Hill CPU incorporates the City of Villages Strategy by designating a neighborhood village in Golden Hill along 25th Street between B and F Streets and a transit corridor (identified as a "village equivalent" in the CPU Land Use Element) along the length of 30th Street. The community and neighborhood village concepts are realized in the proposed CPU areas' setting, commercial centers, transit corridors, institutions, and employment centers. These areas are planned to be vibrant pedestrian neighborhoods with enhanced connectivity that reflects the types of public spaces, structures, public art, connections, and land uses that are influenced by the heterogeneous character of the communities' populations. The proposed North Park and Golden Hill CPU policies direct housing growth to areas suitable for infill and redevelopment that are integrated into the mixed-use cores of the communities.

The proposed North Park and Golden Hill CPUs are intended to provide guidance on orderly growth and redevelopment in accordance with smart growth principles. Through the placement of higher density residential development in areas in and around transit and commercial corridors, the proposed North Park and Golden Hill CPUs would reinforce a mixed-use urban environment that supports transit and pedestrian activity. The proposed North Park and Golden Hill CPUs would designate land uses to accommodate growth, though additional housing units would not be built without demand. Therefore the CPUs would accommodate, not induce, growth in the North Park and Golden Hill communities. The proposed North Park and Golden Hill CPUs each include an IFS that would allow maintenance and improvements in infrastructure capacity and public services to coincide with future development. Other potential environmental impacts associated with

population growth in the proposed North Park and Golden Hill CPU areas (e.g., transportation/traffic, air quality, noise, GHG emissions) are addressed in the relevant sections of this PEIR.

As stated above, the population in the proposed CPU areas will grow whether or not the proposed North Park and Golden Hill CPUs are adopted. The proposed CPUs promote infill residential, commercial, and office development, and encourage the use of local and State programs to incentivize business retention and expansion. Additional policies are intended to facilitate economic wellbeing of locally-owned and operated businesses and create ample job opportunities for residents in the proposed CPU areas. These policies serve to facilitate expansion and new growth of high-quality employment opportunities. Therefore, the proposed North Park and Golden Hill CPUs would provide comprehensive planning for the management of population growth and necessary economic expansion to support the development efforts and allow an appropriate balance of managed population, housing, and economic growth to accommodate community development while maintaining related community and environmental standards.



Chapter 10
Significant Unavoidable Impacts/Significant Irreversible Environmental Changes/Energy Conservation

10.1 Significant and Unavoidable Impacts

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the PEIR. For the proposed Golden Hill and North Park CPUs and associated discretionary actions, impacts related to transportation and circulation (cumulative impacts to roadway segments, intersections, freeway segments and freeway ramps), noise (ambient and vehicle noise impacts), historical resources (historic and archeological resources), and paleontological resources would remain significant and unavoidable effects of the Golden Hill and North Park CPUs. Additionally, the proposed North Park CPU and associated discretionary actions would result in significant and unavoidable impacts related to air quality associated with conflicts with air quality plans and operational emissions (refer to Chapters 6.0 and 7.0, Environmental Analysis, of this PEIR for further detail). All other significant impacts identified in Chapters 6.0 and 7.0 of this PEIR can be reduced to below a level of significance with implementation of the Mitigation Framework identified as well as through compliance with adopted General Plan and CPU policies.

10.2 Significant Irreversible Environmental Impacts

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes which would occur should the proposed Golden Hill and North Park CPUs

and associated discretionary actions be implemented. Irreversible changes typically fall into three categories:

- Primary impacts such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);

- Primary and secondary impacts such as highway improvements which provide access to previously inaccessible areas; and

- Environmental accidents potentially associated with buildout of the proposed Golden Hill and North Park CPUs and associated discretionary actions.

Section 15126.2(c) of the State CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the proposed Golden Hill and North Park CPUs and associated discretionary actions would not result in significant irreversible impacts to agricultural land, biological resources, energy, historic resources, mineral deposits, or water bodies. Although some sensitive biological resources are identified within the canyons and areas designated as open space in the Golden Hill and North Park CPU areas, direct and indirect impacts can be offset through strict compliance with CPU policies, regulatory compliance (MSCP and ESL Regulations of the LDC), and the Mitigation Framework identified in Sections 6.8 and 7.8 of this PEIR for biological resources. Similarly, future development pursuant to the proposed Golden Hill and North Park CPUs and associated discretionary actions could impact important historical or archaeological resources given the presence of known and potential historical and archaeological resources within the communities. The potential archaeological resource impacts can be mitigated through strict adherence to CPU policies, regulatory compliance (LDC Historical Resource Regulations), and implementation of the Mitigation Framework further detailed in Sections 6.7 and 7.7 of this PEIR. Impacts to historical and archeological resources would however, remain significant and unavoidable. As evaluated in Chapter 8, Effects Not Found to be Significant, of this PEIR, implementation of the proposed Golden Hill and North Park CPUs and associated discretionary actions would not result in significant irreversible impacts to agricultural and forestry or mineral resources. Finally, no water bodies are present within the communities, and no downstream receiving waters would be impacted by buildout of either CPU.

Both North Park and Golden Hill are almost completely built out, and are currently accessible via regional transportation facilities (e.g., I-5, I-8, I-805, SR163 and SR94). No new freeways or roadways are proposed that would provide access to currently inaccessible areas. Therefore, implementation of the proposed Golden Hill and North Park CPUs and associated discretionary actions would not result in a significant irreversible commitment with regard to unplanned land use.

Construction of development implemented in accordance with the proposed Golden Hill and North Park CPUs and associated discretionary actions would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from nonrenewable sources, such as fossil

fuels, would be consumed during construction and as a result of operational lighting, heating, cooling, and transportation uses. The proposed Golden Hill and North Park CPUs include policies aimed at improving energy efficiency, reducing water use, and minimizing impacts on other natural resources. For example, the neighborhood and community village concepts would reduce dependence on fossil fuel energy sources by integrating housing units in close proximity to transit corridors. These policies would serve to reduce irreversible water, energy, and building materials consumption associated with construction, occupation, and operation. Energy consumption is discussed in greater detail in Section 10.3 below.

With respect to environmental accidents potentially associated with buildout of the proposed Golden Hill and North Park CPUs and associated discretionary actions and, as further discussed in Sections 6.14 and 7.14 in this PEIR, 40 listed hazardous materials sites of potential environmental concern are located within the North Park CPU area and 16 in the Golden Hill CPU area. Potential impacts related to hazardous materials and associated health hazards from implementation of the proposed Golden Hill and North Park CPUs and associated discretionary actions would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes. The Golden Hill CPU area lies within the AIA for San Diego International Airport. Based on a review of ALUCP airport safety zones in relation to the Golden Hill CPU area, the risk of aircraft-related risks is low. The North Park and Golden Hill CPU areas contain undeveloped land in the form of canyons that is occupied by a variety of native and non-native plant communities. Due to the amount of natural, unmaintained open space in the North Park and Golden Hill CPU areas, the areas pose a high risk for wildfires. Development pursuant to the proposed Golden Hill and North Park CPUs and associated discretionary actions, however, would be subject to applicable State and City regulatory requirements related to fire hazards and prevention. Accidents related to flood hazards would not be significant because neither CPU area contains mapped floodplains.

10.3 Energy Conservation

Section 15126.4 (a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures, which could minimize significant adverse impacts, including, where relevant, the inefficient and unnecessary consumption of energy. CEQA Guidelines, Appendix F, Energy Conservation, provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Resources Agency 2009). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the project.

Because the proposed action is the adoption of two community plans and associated discretionary regulatory actions, and does not specifically address any particular development project(s), impacts to energy resources are addressed generally, based on projected buildout of the proposed Golden Hill and North Park CPUs and associated discretionary actions. Implementation of the proposed Golden Hill and North Park CPUs and associated discretionary actions have the potential to result in impacts to energy supply due to development that is anticipated to occur in response to projected

population growth. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the proposed Golden Hill and North Park CPUs and associated discretionary actions would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code).

Energy resources would be consumed during construction of future development. Energy also would be consumed to provide operational lighting, heating, cooling, and transportation for future development.

10.3.1 Construction-Related Energy Consumption

Grading and construction activities consume energy through the operation of heavy off-road equipment, trucks and worker traffic. At the program-level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type. The majority of energy to be used in conjunction with construction activities would be supplied by SDG&E.

In compliance with the City's Thresholds of Significance, future discretionary projects exceeding the 60 ton solid waste threshold would be required to develop waste management plans targeting at least 75 percent waste reduction, including construction waste. Even though exact details of the projects implemented in accordance with the proposed Golden Hill and North Park CPUs and associated discretionary actions are not known at this time, there are no conditions in the CPU areas that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development pursuant to the proposed Golden Hill and North Park CPUs and associated discretionary actions would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects.

10.3.2 Long-Term Operation-Related Energy Consumption

Long-term operational energy use associated with the proposed Golden Hill and North Park CPUs and associated discretionary actions includes fuel consumption of vehicles and electricity and natural gas consumption by residents and commercial operations, energy consumption related to obtaining water. However, the use of these resources would still be used daily as essential energy sources and utilities regardless of implementation of the proposed Golden Hill and North Park CPUs and associated discretionary actions. As such, although long-term operational energy use would result from future development, such changes would not be considered significant in comparison to the energy use of other cities in the region. The proposed proposed Golden Hill and North Park CPUs and associated discretionary actions would not result in any unusual characteristics that would result in excessive long-term operational building energy demand.

At a minimum, development under the proposed Golden Hill and North Park CPUs and associated discretionary actions would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code). Some efficiencies associated with the Energy Standards under Title 24 include the building heating, ventilating, and air conditioning (HVAC) mechanical system, water heating system, and lighting

system. Additionally, rebate and incentive programs that promote the installation and use of energy efficient plug-in appliances and lighting would be available, but not covered under Title 24. Development would be required to comply with the proposed Golden Hill CPU Conservation Element and proposed North Park CPU Sustainability and Conservation, which contain lists of Sustainable Development Policies that focus on designing new development to have a climate, energy efficient, and environmentally oriented site design .

Policies proposed in the Golden Hill and North Park CPUs would further address energy consumption. Specifically, proposed Conservation Element (Sustainability and Conservation Element in North Park) and Urban Design Element policies would reduce local dependence on automobile transportation, support incorporation of sustainable building and development practices, adhering to standardized measures outlined in the City's Climate Action Plan, encouraging adherence to LEED standards for construction, promoting the continued use or adaptive reuse of existing buildings in conjunction with energy efficiency upgrades. Refer to the proposed Golden Hill and North Park CPUs for specific policies.

Although these policies would decrease the overall per capita energy use in the CPU areas, they would not ensure that energy supplies would be available when needed. Future projects would be subject to review for measures that would further reduce energy consumption in conformance to existing regulations. Furthermore, the City's Climate Action Plan (CAP), adopted by City Council in December 2015, includes 2020 and 2035 targets that are on the trajectory for meeting the 2050 GHG reduction goals established by Executive Order S-3-05. Future projects would be reviewed for consistency with the CAP and applicable implementation measures.

Future operational energy use related to roadways would consist of the transportation fuels consumed to transport area residents, workers, and visitors. The total estimated daily vehicle trips at full buildout are estimated to be 106,389 for the proposed Golden Hill CPU and 460,231 for the proposed North Park CPU, as detailed in the traffic impact analysis prepared for the CPUs (Kimley-Horn 2015). The proposed Golden Hill and North Park CPUs Mobility Elements also contain policies that would reduce VMT and associated fuel consumption. These include policies to improve neighborhood walkability design (North Park CPU Policies ME-1.1 through ME-1.13; Golden Hill CPU Policies ME-1.1 through ME-1.6), expand public transit (North Park CPU Policies ME-2.1 through ME-2.12 and Golden Hill CPU Policies 3.3-1 through 3.3-10 and Golden Hill CPU Policies ME-2.1 through ME-2.8), and increase bicycle infrastructure and bike-riding incentives (Policies ME-1.1-14 through ME-1.19 and Golden Hill CPU Policies ME-1.7 through ME-1.11).

In conclusion, development under the proposed Golden Hill and North Park CPUs and associated discretionary actions would result in increased energy use, in the form of new buildings and transportation. Both residential and nonresidential development use electricity, natural gas, and petroleum products for power, lighting, heating, and other indoor and outdoor services, while cars use both oil and gas. Use of these types of energy for new development would result in the overall increased use of nonrenewable energy resources. This represents an irreversible environmental change.

As described in this PEIR, the proposed Golden Hill and North Park CPUs contain policies aimed at improving energy efficiency, reducing water use, and minimizing impacts to natural resources, which serve to reduce irreversible consumption of building materials, water, and energy use.

11

Chapter 11
Alternatives – North Park

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an EIR compare the effects of a "reasonable range of alternatives" to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should attain most of the basic project objectives, and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

As discussed in Section 6, the proposed North Park CPU and associated discretionary actions would result in significant and/or cumulative environmental impacts related to transportation, air quality, noise, historical resources, and paleontological resources. In developing the alternatives to be addressed in this section, consideration was given regarding the ability to meet the basic objectives of the proposed North Park CPU and associated discretionary actions, and the potential to eliminate or substantially reduce significant environmental impacts (as identified in Section 6 of this PEIR).

The following specific objectives for the proposed North Park CPU and associated discretionary actions support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The following primary goals, recommendations, and objectives of the proposed North Park CPU are to:

- Develop a multi-modal transportation network emphasizing active transportation measures for walkable and bicycle-friendly streets, and transit-related measures supporting transit operations and access.

- Maintain or increase the housing supply through the designation of higher residential densities focusing along major transit corridors.
- Provide for increased economic diversification through land use to increase employment and economic growth opportunities.
- Preserve the neighborhood character and design relationships between neighborhoods within each community through the development of transitions and design policies.
- Identify significant historic and cultural resources within each community and provide for their preservation, protection, and enhancement.
- Provide increased recreation opportunities and new public open spaces.
- Preserve, protect and enhance each community's natural landforms, including canyons and environmentally sensitive lands.
- Include financing strategies that can secure infrastructure improvements concurrent with development.

The alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the proposed North Park CPU;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the proposed North Park CPU and associated discretionary actions. The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria described above, this PEIR considers the following project alternatives:

- No Project Alternative ;
- Higher-Density Alternative; and
- Lower-Density Alternative.

General descriptions of the characteristics of each of these alternatives, along with a discussion of their ability to reduce the significant environmental impacts associated with the proposed North Park CPU and associated discretionary actions, are provided in the following subsections. Table 11-1, Comparison of Proposed Project Impacts with Impacts from the Project Alternatives, provides a side-by-side summary comparison of the potential impacts of the alternatives to the impacts of the proposed North Park CPU and associated discretionary actions.

Table 11-1 Matrix Comparison of North Park CPU Project Alternatives and Proposed CPU for North Park				
Environmental Issue Area	Proposed North Park CPU	No Project Alternative	Higher-Density Alternative	Lower-Density Alternative
Land Use	LS	=	=	=
Visual Effects and Neighborhood Character	LS	=<	=	=
Transportation	SU	=	>	<
Air Quality	SU	<	>	<
Greenhouse Gas	LS	>	=	>
Noise	SU	=	=	=
Historical Resources	SU	>	=	=
Biological Resources	LS	>	=	=
Geology and Seismic Hazards	LS	=	=	=
Paleontological Resources	SU	=	=	=
Hydrology and Water Quality	LS	=	=	=
Public Services and Facilities	LS	=	>	<
Public Utilities	LS	=	=	=
Health & Safety	LS	=	=	=
Notes: SU=Significant and Unavoidable (the issue that results in the impact); LSM=Potentially Significant Mitigated to Less than Significant, LS=Less than Significant, NI=No Impact. Comparison of Impacts: = Impacts the same/similar to the Proposed; < Impact less than the Proposed North Park CPU > Impacts greater than the Proposed North Park CPU.				

11.1 No Project Alternative: Adopted Community Plan

11.1.1 Description

Under the No Project Alternative, the adopted North Park Community Plan would continue to guide development. Last updated in 1986, the adopted Community Plan identifies the following issues that are the most important to be addressed in the Community Plan through policies and regulations:

- Neighborhood conservation and preservation of existing single-family housing stock.
- Housing rehabilitation.
- Revitalization and consolidation of the retail commercial areas.
- Preservation of open space.

- Expansion and enhancement of public transit opportunities through the establishment of strong public transit links with downtown and adjacent communities.
- Improvement in recreational opportunities for the residents of the community.
- Establishment of urban design standards and criteria for the entire community to guide future development.
- Establishment of a canyon and hillside fire prevention program.
- Establishment of mixed land uses in appropriate areas to improve land utilization and encourage redevelopment.
- Preservation of community character and historical, architectural and cultural resources.
- Establishment of consistency between zoning, land use recommendations and adequacy of public facilities.
- Enhancement of school facilities.
- Ability of the community to accommodate new development based upon zoning, the availability of public facilities and growth management policies.
- Establishment of a comprehensive Community Plan implementation program which will be undertaken concurrently with or subsequent to the adoption of the Community Plan.

The No Project Alternative would consist of the adopted Community Plan land use designations as they apply today, including all amendments to the Community Plan from its original adoption in 1988 to the most recent amendment in 2003. Table 11-2 describes the history of amendments to the adopted North Park Community Plan that are considered part of the No Project Alternative.

Table 11-2
Amendments to the 1986 North Park Community Plan

Amendment	Date Adopted by City Council	Resolution Number
Redesignated a portion of the planning area	March 13, 1990	R-275278
Released portions of the planning area from requirements of the Single-Family Protection Ordinance	March 13, 1990	R-275279
Refined areas of the Single-Family Protection Ordinance	June 26, 1990	R-276017
32nd St./Walgreens Parking Structure	December 9, 2003	R-298736

The adopted Community Plan land use designations seek to promote a balance of land uses; however, the majority of the land use in the adopted Community Plan is designated for residential uses. The main corridors, El Cajon Boulevard and University Avenue, are identified for the highest

intensity within the adopted Community Plan. Institutional, Education, and Park and Recreation designations are located on City-owned and other public/quasi-public facilities.

The areas of the North Park CPU area where the degree of change from the existing designations to the proposed North Park CPU designations are those areas along Park and El Cajon Boulevards which are identified as part of the Transit Oriented Enhancement Area. Within the Transit Oriented Enhancement Area is where the proposed North Park CPU would generally facilitate higher intensity mixed-use development compared to the adopted Community Plan. The Enhancement Area would permit higher building heights and densities than those in the adopted Community Plan. The proposed North Park CPU would also include policies to develop additional commercial development along University Avenue and 30th Street, which are also served by transit. Although the number of single-family residents and multi-family development would remain similar to that of the adopted Community Plan, with the use of mixed-use developments within the Enhancement Areas and other corridors, the anticipated population at build-out of the proposed North Park CPU would be about 4,600 persons more than the population under the adopted Community Plan.

Table 11-3 presents a summary of the residential capacity and reasonably anticipated non-residential development under the No Project Alternative. Table 11-4 presents the proposed North Park CPU for comparison. The adopted Community Plan land uses are shown in Section 6.1 of this PEIR as Figure 6.6-1.

Table 11-3
Build-out Under the No Project Alternative For North Park

Land Use	Acres	Dwelling Units	Floor Area
Education	28	-	333,030
Institutional	21		537,410
Multi-Family	553	29,179	-
Office Commercial	10		353,610
Open Space	162	-	-
Parking	5	-	-
Parks	15	-	-
Recreational	3		27,460
Retail Commercial	99		1,809,950
Roads	753	-	-
Single-Family	605	5,116	-
Utilities	-	-	11,900
Vacant	1	-	-
Visitor Commercial	3	-	158,870
Grand Totals	**2,258**	**34,295**	**3,232,230**
Estimated Future Population	**68,610**		

Table 11-4 Build-out Under the Proposed North Park CPU			
Land Use	Acres	Dwelling Units	Floor Area
Education	28	-	333,030
Institutional	21	17	537,410
Multi-Family	554	31,453	-
Office Commercial	9	-	340,010
Open Space	162	-	-
Parking	5	-	-
Parks	16	-	-
Recreational	3		27,450
Retail Commercial	98	-	1,786,300
Roads	753	-	-
Single-Family	605	5,117	-
Utilities	-	-	11,900
Vacant	1	-	-
Visitor Commercial	3	-	158,900
Grand Totals	**2,258**	**36,570**	**3,195,000**
Estimated Future Population	**73,170**		

11.1.2 Environmental Analysis

a. Land Use

The No Project Alternative would retain the adopted North Park Community Plan. Land use impacts under this alternative would be similar or greater than the anticipated impacts to the proposed North Park CPU because the adopted Community Plan does not contain the proposed North Park CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. While it would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact, it would not implement the City of Villages Strategy of the General Plan or the environmental goals, objectives, and guidelines of the General Plan's various elements to the same degree as the proposed North Park CPU.

The adopted Community Plan's open space boundary was not precisely mapped and portions of the MHPA are mapped over existing residential. Thus, this alternative does not support the MSCP Subarea Plan to the same degree as the proposed North Park CPU, which includes MHPA boundary corrections that remove areas designated as residential. The corrections s proposed as part of the proposed North Park CPU would also add open space areas, which are not currently included, into the MHPA; and this would not occur under the No Project Alternative.

The adopted Community Plan would not include all of the proposed plan policies supporting the Historical Resources protections. Though new development occurring under the No Project Alternative would be required to comply with the City's Land Development Code, this alternative would not benefit from the supplemental development regulations to create additional safeguards

for specified historic preservation district that are included with the proposed North Park CPU and associated discretionary actions. Therefore, while land use impacts would still be less than significant under this alternative, impacts would be greater in comparison to the proposed North Park CPU and associated discretionary actions.

b. Visual Effects and Neighborhood Character

Potential visual effects and impacts to neighborhood character under the No Project Alternative would be similar to those anticipated under the proposed North Park CPU and associated discretionary actions; however, the no project alternative would not include proposed design guidelines and policies intended to enhance and preserve community character. While the proposed North Park CPU does include increases in density and building heights such as those within the Community Plan Enhancement Program areas, generally the proposed North Park CPU and the No Project Alternative would produce similar bulk and scale development. However, the No Project Alternative would also not include proposed North Park CPU policies that reduce the impact of future development on community character, preserve historic resources, preserve the structural and visual integrity of the areas' landform, and establish appropriate uses of lighting and encourage lighting design that minimizes light pollution and excess glare. In addition, the proposed North Park CPU includes policies that address the potential impacts associated with development in the Community Plan Enhancement Program areas; policies which would not be implemented under the No Project Alternative.

Similar to the No Project Alternative, the proposed North Park CPU and associated discretionary actions would not propose any specific developments that would substantially alter existing or planned character or involve the grading or alteration of steep slopes, and all future development would be required to comply with existing regulations regarding grading activities and lighting design. Therefore, impacts for the No Project Alternative would be less than significant and similar or slightly reduced compared to the proposed North Park CPU.

c. Transportation

The No Project Alternative would generate fewer vehicular trips than the proposed North Park CPU. However, the No Project Alternative does not contain the proposed North Park CPU policies intended to promote a multimodal network that encourage walking, bicycling, and use of transit. Nor does the No Project Alternative contain policies that support the policies of SANDAG's San Diego Forward. While impacts to individual intersections and roadway segments would be lesser in the No Project Alternative than the proposed North Park CPU, these impacts would remain significant and unavoidable because similar to the proposed CPU, build-out of land uses would result in significant and unavoidable impacts to roadway segments and intersections since improvements necessary to mitigate impacts are not necessarily supported by the CPU polices and no guaranteed funding mechanism is available. In addition, the No Project Alternative is not consistent with the goals and policies of the General Plan's City of Villages Strategy as well as the implementation strategy of the Climate Action Plan.

d. Air Quality

The No Project Alternative would retain the adopted North Park Community Plan. Air Quality impacts under this alternative would be less than the anticipated impacts of the proposed North Park CPU. Unlike the proposed North Park CPU, the No Project Alternative would not conflict with or obstruct implementation of the applicable air quality plan, which for the proposed North Park CPU would require mitigation, nor would the adopted North Park Community Plan result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. Furthermore, the No Project Alternative's future operational emissions would be less than those of the proposed North Park CPU. Because the land use changes associated with the proposed North Park CPU would result in an effective increase in emissions, the impacts of the No Project Alternative would be less than the proposed North Park CPU and associated discretionary actions.

e. Greenhouse Gases

The No Project Alternative would result in less than significant impacts related to GHG, similar to the proposed North Park CPU and associated discretionary actions. However, compared to the proposed CPU, GHG impacts would be slightly greater than the proposed CPU because the No Project Alterative would not change land uses to be consistent with the City of Villages and CAP strategies. While t~~T~~he proposed North Park CPU would increase GHG emissions over those of the adopted Community Plan~~; however~~, this increase in GHG is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. The proposed CPU would i~~I~~ncrease~~ing~~ residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP. Therefore, the No Project Alternative would result in less than significant impacts related to GHG, similar to the proposed North Park CPU and associated discretionary actions, although impacts would be slightly greater due to inconsistency with the City's CAP.

f. Noise

The No Project Alternative would retain the adopted North Park Community Plan. Noise impacts under this alternative would be similar to the anticipated impacts under the proposed North Park CPU. Similar to the proposed North Park CPU development, under the adopted Community Plan, sensitive noise receptors would be impacted by ambient noise increases from traffic on area roadways and exposure to vehicular noise from freeways.. While the No Project Alternative does not contain the proposed North Park CPU policy changes intended to improve compatibility with the San Diego General Plan, both the No Project Alternative and the proposed North Park CPU and associated discretionary actions would be required to follow City noise regulations as well as state regulations such as the Code of Regulations Title 24. However, even with implementation of these regulations, existing noise sensitive land uses and future noise sensitive land uses would be subject to potential noise impacts from ambient and transportation noise. Therefore, the resulting noise impacts for both the No Project Alternative and the proposed North Park CPU would be significant and unavoidable.

g. Historical Resources

The No Project Alternative would retain the adopted North Park Community Plan with no additional discretionary actions, including the supplemental development regulations for potential historic districts. Included with the proposed North Park CPU discretionary actions is an amendment to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. These regulations would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts.

As with the proposed North Park CPU and associated discretionary actions, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to both historical and archaeological resources. The extent of impacts to archaeological resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed North Park CPU. Therefore, impacts to historical resources would be greater, yet still significant and unavoidable, similar to the proposed North Park CPU and associated discretionary actions.

h. Biological Resources

Under the No Project Alternative the MHPA boundary corrections proposed in the proposed North Park CPU would have to go forward as a separate action, and until this action was completed it is likely that the amount of preserved open space would be less and sensitive habitat outside of the MHPA could be impacted. As such, the No Project Alternative would result in greater potential impacts to biological resources than those anticipated under the proposed North Park CPU. Implementation of the No Project Alternative would also be required to adhere to all applicable federal, state, and local regulations regarding the protection of biological resources, which is the same for all subsequent development project submittals under the proposed North Park CPU. Therefore, impacts under this alternative would be similar, but slightly greater than those identified for the proposed North Park CPU and associated discretionary actions.

i. Geology Conditions

Similar to the proposed North Park CPU and associated discretionary actions, potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils, would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the California Building Code, the San Diego Municipal Code, and the Seismic Hazards Mapping Act. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements, and, if necessary, NPDES General Construction Storm Water Permit provisions and a prepared site-specific Stormwater Pollution Prevention Plan would ensure that future grading and construction activities would avoid significant soil erosion impacts. Impacts from the No Project Alternative would be similar to those of the proposed North Park CPU and associated discretionary actions.

j. Paleontological Resources

As with the proposed North Park CPU, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources. Implementation of future projects under this alternative would require adherence to all applicable local regulations and guidelines further described in Section 6.10, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed North Park CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed North Park CPU, implementation of the No Project Alternative would result in potentially significant impacts related to paleontological resources at the program level.

k. Hydrology and Water Quality

The land use pattern and distribution for the No Project Alternative is generally the same as the proposed North Park CPU. While there would be a potential for impacts, future development would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level, so impacts under both the No Project Alternative and the proposed North Park CPU would remain less than significant.

l. Public Services and Facilities

The No Project Alternative would retain the adopted North Park Community Plan. Impacts to Public Services and Facilities under this alternative would be similar or lesser than the anticipated impacts to the proposed North Park CPU because the anticipated population at build-out of the No Project Alternative would be less than the anticipated population for the build-out of the proposed North Park CPU. For police and fire protection services the difference in population would not impact either the police or fire department in their ability to provide service, nor would the departments require the construction of new facilities. For both the No Project Alternative and the proposed North Park CPU, future projects would be required to pay for any potential impacts to schools reducing these impacts to less than significant. Similarly both the No Project Alternative and the proposed North Park CPU include financing mechanisms to provide for libraries. However, in the case of both the No Project Alternative and the proposed North Park CPU there results in a deficit in population based parks and the need to build new recreational facilities. Construction of new facilities would require separate environmental review and if required mitigation, so the impacts of new construction of new facilities for both the No Project Alternative and the proposed North Park CPU would be less than significant. While the anticipated population of the No Project Alternative would require smaller amount of new park land the impact, like the proposed North Park CPU, the deficit in park land would be adverse but less than significant.

m. Public Utilities

The No Project Alternative would retain the adopted North Park Community Plan. Impacts to Public Utilities under this alternative would be similar to the anticipated impacts to the proposed North Park CPU. Although the No Project Alternative does not contain the proposed North Park CPU

policies and land use changes intended to improve compatibility with and implement the San Diego General Plan, the anticipated population at build-out of the No Project Alternative is smaller than the anticipated population of the proposed North Park CPU. Although the proposed North Park CPU would have a larger anticipated population than the No Project Alternative, as discussed in section 6.13, Public Utilities, the implementation of the proposed North Park CPU would not result in significant impacts to storm water, sewer, water, communications, solid waste and recycling, or energy. Therefore the impacts for both the No Project Alternative and the proposed North Park CPU are less than significant.

n. Health and Safety

Impacts from the No Project Alternative would be similar or slightly less than the proposed North Park CPU. Future development under the No Project Alternative has the potential to result in exposure to hazardous materials, wastes, or emissions; airport hazards, and fire hazards. As the No Project alternative would result in a slighter lower population growth than the proposed North Park CPU, there would be fewer people exposed to these potential hazards. Additionally, there would not be any areas of change or land use changes that would increase potential exposure to hazards. Federal, state and local regulations that serve to reduce impacts a less than significant level would also cover the No Project alternative. Overall, impacts would be less than significant and somewhat less than those anticipated under the proposed North Park CPU.

11.2 Higher-Density Alternative

11.2.1 Description

The Higher-Density Alternative utilizes the proposed North Park CPU and increases intensity within specific commercial nodes. The node locations and associated density increases beyond the proposed North Park CPU are shown on Figure 11-1 and are noted below:

1. Along 30th North Park Way to Upas (up to 44 du/ac)
2. Meade to Madison (up to 109 du/ac)
3. Along 30th Madison to Adams (up to 73 du/ac)
4. Along Adams between Kansas and Hamilton (up to 44 du/ac)
5. Along 30th at Thorn, Redwood, and Jupiter (up to 44 du/ac)
6. University between Mississippi and Louisiana (up to 44 du/ac)

The Higher-Density Alternative would increase densities in line with the goal of facilitating transit-oriented development and mixed use development. It expands residential capacity in select mixed-use areas near and along transit corridors. The increase would accommodate approximately 384 additional Multi-Family units in areas where residents would have access to transit and commercial services. The remaining land use designations in the Higher-Density Alternative would be the same as in the proposed North Park CPU. All of the other policies in the Higher-Density Alternative are the same as those included in the proposed North Park CPU; all other discretionary actions would be the same as the proposed North Park CPU for this alternative.

Table 11-5 presents a summary of the residential capacity and reasonably anticipated non-residential development under the Higher-Density Alternative. Figure 11-1 show proposed land use designations under this alternative.

Table 11-5
Build-out Under the Higher-Density Alternative for North Park CPU

Land Use	Acres	Dwelling Units	Floor Area
Education	28	-	333,034
Institutional	21	-	537,407
Multi-Family	554	31,837 (31,453*)	-
Office Commercial	9	-	340,007
Open Space	162	-	-
Parking	5	-	-
Parks	16	-	-
Recreational	3	-	27,463
Retail Commercial	98	-	1,786,245
Roads	753	-	-
Single-Family	605	5,117	-
Utilities	-	-	11,933
Vacant	1	-	-
Visitor Commercial	3	-	158,866
Grand Totals	**2,258**	**36,954 (36,570*)**	**3,194,955**
Estimated Future Population	**74,190 (73,170*)**		

*Proposed North Park CPU

Map Source: SanGIS

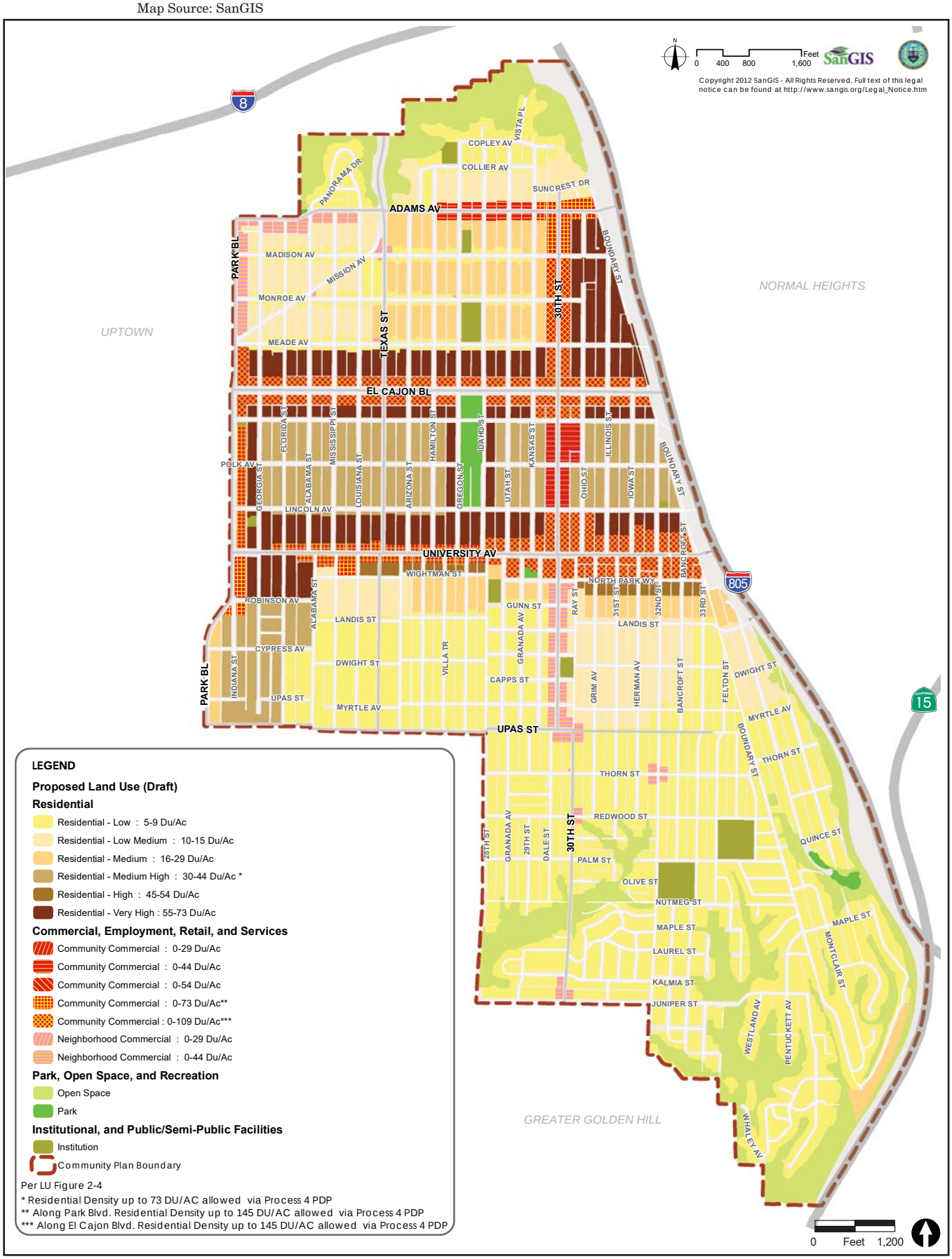


FIGURE 11-1
Higher-Density Alternative – North Park

11.2.2 Environmental Analysis

a. Land Use

The Higher-Density Alternative would retain the proposed North Park CPU land uses but would increase intensity within specific commercial nodes beyond the Community Plan Enhancement Areas. Land use impacts under this alternative would be similar to the anticipated impacts to the proposed North Park CPU. While the Higher-Density Alternative would facilitate transit-oriented development and mixed use development to a greater degree than the proposed North Park CPU, the land use changes proposed in both the proposed North Park CPU and the Higher-Density Alternative are intended to improve compatibility with and implement the San Diego General Plan. Like the proposed North Park CPU, this alternative would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact, similar to the proposed North Park CPU.

b. Visual Effects and Neighborhood Character

Potential visual effects and impacts to neighborhood character under the Higher-Density Alternative would be similar to those anticipated under the proposed North Park CPU. Like the proposed North Park CPU, the Higher-Density Alternative includes increases in density and building heights such as those within the Community Plan Enhancement Program Areas as well as along 30th Street and Adams Avenue. Generally, the proposed North Park CPU and the Higher-Density Alternative would produce similar bulk and scale development. The Higher-Density Alternative would also include proposed North Park CPU policies that reduce the impact of future development on community character and related visual effects. The overall aesthetic impact would less than significant, similar to the proposed North Park CPU.

c. Transportation

The Higher-Density Alternative would generate more vehicular trips than the proposed North Park CPU. While the Higher-Density Alternative would contain the proposed North Park CPU policies intended to promote a multimodal network that encourage walking, bicycling, and taking transit, the impacts to individual intersections and roadway segments would be greater than the proposed North Park CPU, and like the proposed North Park CPU these impacts would remain significant and unavoidable.

d. Air Quality

The Higher-Density Alternative would increase the amount of traffic generated. As such, Air Quality impacts under this alternative would greater than the anticipated impacts due to the proposed North Park CPU. Like the proposed North Park CPU, the Higher-Density Alternative would conflict with or obstruct implementation of the applicable air quality plan, or would it result in a violation of any air quality standard or contribute substantially to an adopted or projected air quality violation. In addition, the Higher-Density Alternative's future operational emissions would be greater than those of the proposed North Park CPU and therefore significant, which like the proposed North Park

CPU would require mitigation. Because the land use changes associated with the Higher-Density Alternative would result in an effective increase in emissions, the impacts of the Higher-Density Alternative would be greater than the proposed North Park CPU.

e. Greenhouse Gases

The Higher-Density Alternative would slightly increase GHG emissions over those of the proposed North Park CPU; however, the increased density in the Higher-Density Alternative furthers the goals of the CAP, specifically CAP Strategy 3: Bicycling, Walking, Transit & Land Use, of facilitating transit-oriented development and mixed use development. It expands residential capacity in select mixed-use areas near and along transit corridors. The increase would accommodate approximately 384 additional Multi-Family units within the Higher-Density Alternative in areas where residents would have convenient access to transit and commercial services. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP. Impacts associated with GHG emissions under both the alternative and the proposed North Park CPU would be similar and would be less than significant.

f. Noise

The Higher-Density Alternative would result in increased densities along certain commercial corridors. Noise impacts under this alternative would be similar to the anticipated impacts under the proposed North Park CPU because like the proposed North Park CPU the development under the Higher-Density Alternative could impact sensitive noise receptors. Development under both the Higher-Density Alternative and the proposed North Park CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24; however, the increase in development could expose sensitive receptors to increase noise levels. Therefore, the resulting noise impacts for both the Higher-Density Alternative and the proposed North Park CPU would be similar and would remain significant and unavoidable.

g. Historical Resources

While the Higher-Density Alternative would permit greater development, the Higher-Density Alternative would retain the proposed amendment to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation.

Like the proposed North Park CPU, this alternative with the adopted supplemental development regulations is consistent with the policies of the proposed North Park CPU Historic Preservation Element to provide additional protection for potential historic districts, but like the proposed North Park CPU it is impossible to ensure the successful preservation of all historical resources within the North Park CPU area. Therefore, potential impacts to the historical resources from implementation of the Higher-Density Alternative remain significant and unavoidable like the proposed North Park CPU.

As with the proposed North Park CPU, future development under the Higher-Density Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 6.7, Historical Resources. The extent of impacts to archaeological resources resulting from implementation of the Higher-Density Alternative would be similar to those identified for the proposed plan, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed North Park CPU, implementation of the Higher-Density Alternative would result in potentially significant impacts related to archaeological resources at the program level.

h. Biological Resources

Like the proposed North Park CPU, the Higher-Density Alternative would include the MHPA boundary corrections. Therefore, the Higher-Density Alternative would result in similar impacts to biological resources as those anticipated under the proposed North Park CPU. Implementation of the Higher-Density Alternative would also be required to adhere to all applicable federal, state, and local regulations regarding the protection of biological resources, which is the same for all subsequent development project submittals under the proposed North Park CPU. Therefore, impacts under this alternative would be similar to those identified for the proposed North Park CPU.

i. Geology Conditions

Impacts from the Higher-Density Alternative would be similar to those of the proposed North Park CPU. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the California Building Code, the San Diego Municipal Code, and the Seismic Hazards Mapping Act. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements, and, if necessary, NPDES General Construction Storm Water Permit provisions and a prepared site-specific Storm water Pollution Prevention Plan would ensure that future grading and construction activities would avoid significant soil erosion impacts.

j. Paleontological Resources

As with the proposed North Park CPU, implementation of the Higher-Density Alternative has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources. Implementation of future projects under Higher-Density Alternative would require adherence to all applicable local regulations and guidelines further described in Section 6.10, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the Higher-Density Alternative would be similar to those identified for the proposed North Park CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed North Park CPU, implementation of the Higher-Density Alternative would result in potentially significant impacts related to paleontological resources at the program level

k. Hydrology and Water Quality

The land use pattern and distribution for the Higher-Density Alternative is generally the same as the proposed North Park CPU. Like the proposed North Park CPU, the Higher-Density Alternative would implement the boundary corrections in the proposed North Park CPU which is likely to preserve the same amount of open space. The development footprint of the Higher-Density Alternative would be similar to the proposed North Park CPU and future development would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level. Thus impacts related to hydrology and water quality would be similar.

l. Public Services and Facilities

Impacts to Public Services and Facilities under the Higher-Density Alternative would be similar or greater than the anticipated impacts under the proposed North Park CPU because the anticipated population at build-out of the Higher-Density Alternative would be more than the anticipated population for the build-out of the proposed North Park CPU. For police and fire protection services, the difference in population would not impact either the police or fire department in their ability to provide service, nor would the departments require the construction of new facilities. For both the Higher-Density Alternative and the proposed North Park CPU, future projects would be required to pay for any potential impacts to schools reducing these impacts to less than significant. Similarly, both the Higher-Density Alternative and the proposed North Park CPU include financing mechanisms to provide for libraries. However, in the case of both the Higher-Density Alternative and the proposed North Park CPU, there results in a deficit in population based parks and the need to build new recreational facilities. Construction of new facilities would require separate environmental review and if required mitigation, so the impacts of new construction of new facilities for both the Higher-Density Alternative and the proposed North Park CPU would be less than significant. With the anticipated population of the Higher-Density Alternative, more new parkland would be required than the proposed North Park CPU and the deficit in parkland would be adverse, but less than significant.

m. Public Utilities

Impacts to Public Utilities under this alternative would be slightly greater than the anticipated impacts under the proposed North Park CPU. Like the proposed North Park CPU, the Higher-Density Alternative contains the proposed North Park CPU policies and land use changes intended to improve compatibility with and implement the City's General Plan. However, the anticipated population at build-out of the Higher-Density Alternative is greater than the anticipated population of the proposed North Park CPU. As discussed in section 6.13, Public Utilities, the implementation of the proposed North Park CPU would not result in significant impacts related to storm water, sewer, water, communications, solid waste and recycling, or energy. It is anticipated that the increase of 384 multi-family units in the implementation of the Higher-Density Alternative would result in an approximate population increase of 1,000 persons; thus, the Higher-Density Alternative would result in slightly greater impacts on public utilities due to increased demand.

n. Health and Safety

Impacts from the Higher-Density Alternative would be similar or slightly more than the proposed North Park CPU. Future development under the Higher-Density Alternative has the potential to result in exposure to hazardous materials, wastes, or emissions; airport hazards, and fire hazards. As the Higher-Density Alternative would result in a slighter higher population growth than the proposed North Park CPU, there could be more people exposed to these potential hazards. However, Federal, state and local regulations that serve to reduce impacts a less-than-significant level would also address the Higher-Density Alternative. Overall, impacts would be less than significant and the same as those anticipated under the proposed North Park CPU.

11.3 Lower-Density Alternative

11.3.1 Description

The Lower-Density Alternative uses the proposed North Park CPU land uses; removes the PDP density increase mechanism and decreases intensity in the central multi-family area. This alternative maintains the proposed North Park CPU's objectives to create walkable areas with mixed use development along transit corridors and within commercial nodes. However, the density of future development would be lower under this alternative, resulting in less overall development near these facilities. The Lower-Density Alternative would result in approximately 1,700 fewer units and a population decrease of approximately 3,150 compared to the proposed North Park CPU.

The main reduction in density would occur in the residential neighborhood between El Cajon Blvd and University Avenue. Residential densities would be designated for 16-29 du/ac in the central residential area and 30-44 du/ac for properties abutting the commercial corridors. The other density reductions would occur with the removal of the discretionary process 4 PDP density increase tool proposed with the proposed North Park CPU. The Medium High Residential zone would not be allowed to increase from a maximum 44 du/ac to 73 du/ac, within commercial areas along Park Blvd from 73 du/ac to 145 du/ac, and El Cajon Blvd. from 109 du/ac to 145 du/ac.

The Lower-Density Alternative would reduce the allowed density in both the central residential and mixed use areas of the community. The rest of the community would mirror the proposed North Park CPU and the Lower-Density Alternative would also feature all the same policies as the proposed North Park CPU; all other discretionary actions would be the same as the proposed North Park CPU for this alternative.

Table 11-6 presents a summary of the residential and non-residential development projected under the Lower-Density Alternative. Figure 11-2 shows land use designations under this alternative.

Table 11-6 Build-out Under Lower-Density Alternative for North Park CPU			
Land Use	Acres	Dwelling Units	Floor Area
Education	28	-	333,034
Institutional	21	-	537,407
Multi-Family	554	29,764	-
Office Commercial	9	-	340,007
Open Space	162	-	-
Parking	5	-	-
Parks	16	-	-
Recreational	3	-	27,463
Retail Commercial	98	-	1,786,245
Roads	753	-	-
Single-Family	605	5,117	-
Utilities	-	-	11,933
Vacant	1	-	-
Visitor Commercial	3	-	158,866
Grand Totals	**2,258**	**34,881**	**3,194,955**
Estimated Future Population =	**70,020 (73,170*)**		

Map Source: SanGIS

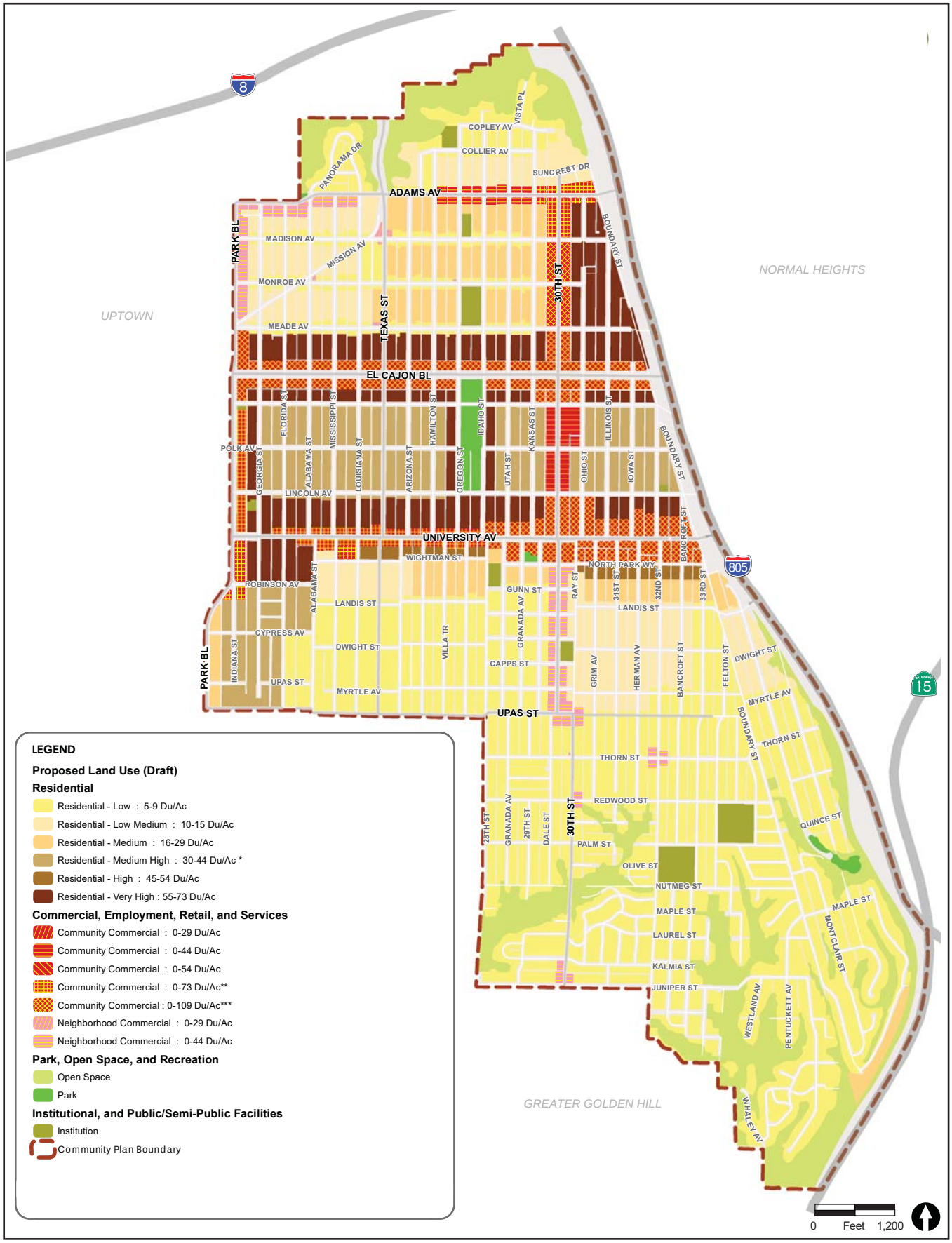


FIGURE 11-2

Lower-Density Alternative – North Park

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11.3.2 Environmental Analysis

a. Land Use

The Lower-Density Alternative would retain the proposed North Park CPU land uses but would decrease intensity within both the central residential and mixed use areas of the community. Land use impacts under this alternative would be similar to those of the proposed North Park CPU. The Lower-Density Alternative would facilitate transit-oriented development and mixed use development but to a lesser degree than the proposed North Park CPU and the land use changes are compatible with the implementation of the San Diego General Plan, but to a lesser degree. Impacts of the Lower-Density Alternative would be similar to the proposed North Park CPU as it would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact.

b. Visual Effects and Neighborhood Character

Potential visual effects and impacts to neighborhood character under the Lower-Density Alternative would be similar to those anticipated under the proposed North Park CPU. Like the proposed North Park CPU, the Lower-Density Alternative includes some increases in density but removes the Community Plan Enhancement Program. Generally, the proposed North Park CPU and the Lower-Density Alternative would produce similar bulk and scale development. Like the proposed North Park CPU, the Lower-Density Alternative would also include proposed North Park CPU policies that reduce the impact of future development on community character and related visual effects. As such, the overall impact would be similar to that of the proposed North Park CPU.

c. Transportation and Circulation

The Lower-Density Alternative would generate fewer vehicular trips than the proposed North Park CPU. The Lower-Density Alternative would also contain the proposed North Park CPU policies intended to promote a multimodal network that encourage walking, bicycling, and taking transit, and the impacts to individual intersections and roadway segments would be less than the proposed North Park CPU. ~~However, because t~~The impacts to individual intersections and roadway segments would be reduced under this alternative due to reduced vehicle trips; however, transportation facility impacts would still occur and ~~not be fully mitigated the~~ impacts would remain significant and unavoidable. In addition, with lower densities, even with the inclusion of the proposed plan policies, it is unlikely that the multimodal networks would be implemented to the level envisioned in the proposed North Park CPU. Overall, impacts of the Lower-Density Alternative would be slightly reduced compared to the proposed North Park CPU.

d. Air Quality

The Lower-Density Alternative would decrease the amount of traffic generated locally. As such, Air Quality impacts under this alternative would create fewer than the anticipated impacts under the proposed North Park CPU. Unlike the proposed North Park CPU, the Lower-Density Alternative would not conflict with or obstruct implementation of the applicable air quality plan, nor would it

result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. The Lower-Density Alternative's future operational emissions would be lower than those of the proposed North Park CPU and less than significant.

e. Greenhouse Gases

The Lower-Density Alternative would decrease GHG emissions over those of the proposed North Park CPU, as there would be approximately 1,700 fewer units when compared to the proposed plan. However, the decrease in density would occur in areas where residents would have convenient access to transit and commercial services and would result in a potential conflict with the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Decreasing residential and commercial density in transit corridors and Community Villages within a Transit Priority Area (TPA) would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP and thus, impacts associated with GHG Plan Consistency~~emissions~~ would be greater than the proposed North Park CPU and would potentially significant for the Lower-Density Alternative.

f. Noise

The Lower-Density Alternative would result in decreased densities along certain commercial corridors. Noise impacts under this alternative would be similar to the anticipated impacts under the proposed North Park CPU because like the proposed North Park CPU the Lower-Density Alternative would permit development that could impact sensitive noise receptors. Both the Lower-Density Alternative and the proposed North Park CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24. Although the resulting noise impacts for the Lower-Density Alternative would be less than those impacts of the proposed North Park CPU, the impacts would remain significant and unavoidable.

g. Historical Resources

The Lower-Density Alternative would retain the proposed amendment to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. Like the proposed North Park CPU, the supplemental development regulations are consistent with the policies of the proposed North Park CPU Historic Preservation Element to provide additional protection for potential historic districts. While the Lower-Density Alternative could result in a reduced number of projects that would modify historical resources, like the proposed North Park CPU it is impossible to ensure the successful preservation of all historical resources within the plan area. Therefore, potential impacts to the historical resources from implementation of the Lower-Density Alternative would be similar to the proposed North Park CPU and would remain significant and unavoidable.

As with the proposed North Park CPU, future development under the Lower-Density Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable local regulations and guidelines further described in Section 6.7, Historical Resources. The extent of

impacts to archaeological resources resulting from implementation of the Lower-Density Alternative would be similar to those identified for the proposed North Park CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. Implementation of the Lower-Density Alternative would result in similar potentially significant impacts to archaeological resources at the program level as the proposed North Park CPU.

h. Biological Resources

Like the proposed North Park CPU, the Lower-Density Alternative would include MHPA boundary corrections. Therefore, the Lower-Density Alternative would result in similar impacts to biological resources as those anticipated under the proposed North Park CPU. Implementation of the Lower-Density Alternative would also be required to adhere to all applicable federal, state, and local regulations regarding the protection of biological resources, which would be the same for all subsequent development project submittals under the proposed North Park CPU. Therefore, impacts under this alternative would be similar to those identified for the proposed North Park CPU.

i. Geology Conditions

Impacts from the Lower-Density Alternative would be similar to those of the proposed North Park CPU. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the California Building Code, the San Diego Municipal Code, and the Seismic Hazards Mapping Act. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements, and, if necessary, NPDES General Construction Storm Water Permit provisions and a prepared site-specific Stormwater Pollution Prevention Plan would ensure that future grading and construction activities would avoid significant soil erosion impacts.

j. Paleontological Resources

As with the proposed North Park CPU, future development under the Lower-Density Alternative has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources. Implementation of future projects under this alternative would require adherence to all applicable local regulations and guidelines further described in Section 6.10, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the Lower-Density Alternative would be similar to those identified for the proposed North Park CPU, because the extent and areas of disturbance by development would be generally the same and only the land use densities would change. Implementation of the Lower-Density Alternative would result in potentially significant impacts related to paleontological resources at the program level, and impacts would be the same as with the proposed North Park CPU.

k. Hydrology and Water Quality

The land use pattern and distribution for the Lower-Density Alternative is generally the same as the proposed North Park CPU. Like the proposed North Park CPU, the Lower-Density Alternative would implement MHPA boundary corrections proposed in the North Park CPU, which is likely to preserve the same amount of open space. Impacts of the Lower-Density Alternative would be similar to the proposed North Park CPU since the development footprint and impervious areas would be similar. Additionally, future development would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level. Thus, impacts under both the Lower-Density Alternative and the proposed North Park CPU would be similar and would be less than significant.

l. Public Services and Facilities

Impacts to Public Services and Facilities under the Lower-Density Alternative would be slightly less than the anticipated impacts under the proposed North Park CPU because the anticipated population at build-out of the Lower-Density Alternative would be less than the anticipated population for the build-out of the proposed North Park CPU which would slightly reduce demand on public facilities and services. For police and fire protection services, the difference in population would not impact either the police or fire department in their ability to provide service, nor would the departments require the construction of new facilities. For both the Lower-Density Alternative and the proposed North Park CPU, future projects would be required to pay school fees. Similarly, both the Lower-Density Alternative and the proposed plan include financing mechanisms to provide for libraries. In the case of both the Lower-Density Alternative and the proposed North Park CPU there results in a deficit in population based parks and the need to build new recreational facilities. Thus, the Lower-Density Alternative would slightly reduce the demand on public services and facilities and impacts would be slightly reduced compared to the proposed North Park CPU.

m. Public Utilities

Impacts to Public Utilities under this alternative would be similar to the anticipated impacts to the proposed North Park CPU. Like the proposed North Park CPU, the Lower-Density Alternative contains the proposed North Park CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. The anticipated population at build-out of the Lower-Density Alternative is less than the anticipated population of the proposed North Park CPU. As discussed in section 6.13, Public Utilities, the implementation of the proposed North Park CPU would not result in significant impacts to storm water, sewer, water, communications, solid waste and recycling, or energy. Impacts of the Lower-Density Alternative would be similar to the impacts under the proposed North Park CPU.

n. Health and Safety

Impacts from the Lower-Density Alternative would be similar or slightly less than the proposed North Park CPU. Future development under the Lower-Density Alternative has the potential to result in exposure to hazardous materials, wastes, or emissions; airport hazards, and fire hazards. As the Lower-Density Alternative would result in a slighter lower population growth than the

proposed North Park CPU, there would be fewer people exposed to these potential hazards. However, Federal, state and local regulations would reduce impacts a less than significant level. Overall, impacts would be less than significant and similar to those anticipated under the proposed North Park CPU.

11.4 Environmentally Superior Alternative for North Park CPU

As required under Section 15126.6 (e)(2) of the CEQA Guidelines, the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the proposed North Park CPU goals and objectives, the environmental superior alternative as compared to the proposed North Park CPU for this Program EIR is the Lower-Density Alternative. While the Lower-Density Alternative does reduce impacts to Transportation and Traffic, Air Quality, and Public Services and Facilities s as compared to the North Park Community Plan, the Lower-Density Alternative would still result in significant and unavoidable impacts to Transportation and Traffic, Noise, Historical Resources and Paleontological Resources. While the Lower-Density Alternative does reduce the impacts to Air Quality to less than significant, the Lower-Density Alternative does not support the full implementation of the General Plan's City of Villages Strategy of developing multi-modal centers that encourage walking, bicycling, and taking transit and contain a mixture of commercial and residential development. The Lower-Density Alternative would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP.

12

Chapter 12
Alternatives – Golden Hill

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) compare the effects of a "reasonable range of alternatives" to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should attain most of the basic project objectives, and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

As discussed in Section 7, the proposed Golden Hill CPU and associated discretionary actions would result in significant and/or cumulative environmental impacts related to transportation, noise, historical resources, and paleontological resources. In developing the alternatives to be addressed in this section, consideration was given regarding the ability to meet the basic objectives of the proposed Golden Hill CPU and associated discretionary actions, and the potential to eliminate or substantially reduce significant environmental impacts (as identified in Section 7 of this PEIR).

The following specific objectives for the proposed Golden Hill CPU and associated discretionary actions support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the Lead Agency in preparing findings and overriding considerations, if necessary. The following primary goals, recommendations, and objectives of the proposed Golden Hill CPU are to:

- Develop a multi-modal transportation network emphasizing active transportation measures for walkable and bicycle-friendly streets, and transit-related measures supporting transit operations and access.

- Maintain or increase the housing supply through the designation of higher residential densities focusing along major transit corridors.
- Provide for increased economic diversification through land use to increase employment and economic growth opportunities.
- Preserve the neighborhood character and design relationships between neighborhoods within each community through the development of transitions and design policies.
- Identify significant historic and cultural resources within each community and provide for their preservation, protection, and enhancement.
- Provide increased recreation opportunities and new public open spaces.
- Preserve, protect and enhance each community's natural landforms, including canyons and environmentally sensitive lands.
- Include financing strategies that can secure infrastructure improvements concurrent with development.

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the proposed Golden Hill CPU;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the proposed Golden Hill CPU and associated discretionary actions ;
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria above, this PEIR considers the following project alternatives:

- No Project Alternative;
- Higher-Density Alternative; and
- Lower-Density Alternative.

General descriptions of the characteristics of each of these alternatives, along with a discussion of their ability to reduce the significant environmental impacts associated with the proposed Golden Hill CPU and associated discretionary actions, are provided in the following subsections. Table 12-1, Comparison of Proposed Project Impacts with Impacts from the Project Alternatives, provides a side-

by-side summary comparison of the potential impacts of the alternatives to the impacts of the proposed Golden Hill CPU and associated discretionary actions.

Table 12-1
Matrix Comparison of the Proposed Golden Hill Project Alternatives and Proposed Golden Hill CPU

Environmental Issue Area	Proposed Golden Hill CPU	No Project Alternative	Higher-Density Alternative	Lower-Density Alternative
Land Use	LS	=	=	=
Visual Effects and Neighborhood Character	LS	=	=	=
Transportation	SU	>	>	<
Air Quality	LS	=	>	<
Greenhouse Gas	LS	>	=	>
Noise	SU	=	=	=
Historical Resources	SU	>	=	=
Biological Resources	LS	>	=	=
Geology and Seismic Hazards	LS	=	=	=
Paleontological Resources	SU	=	=	=
Hydrology and Water Quality	LS	=	=	=
Public Services and Facilities	LS	=	>	<
Public Utilities	LS	=	=	=
Health & Safety	LS	=	=	=

Notes: SU=Significant and Unavoidable (the issue that results in the impact); LSM=Potentially Significant Mitigated to Less than Significant, LS=Less than Significant, NI=No Impact. Comparison of Impacts: = Impacts the same/similar to the Proposed Golden Hill CPU; < Impact less than the Proposed Golden Hill CPU > Impacts greater than the Proposed Golden Hill CPU.

12.1 No Project Alternative

12.1.1 Description

Under the No Project Alternative, the adopted Golden Hill Community Plan would continue to guide development. Last updated in 1988, the adopted Community Plan identifies the following issues that are the most important to be addressed in the Community Plan through policies and regulations:

- Achieving conformance between zoning and Community Plan land use designations.
- Preservation of community scale, character/historical and architectural resources.
- Preservation of single-family and low-density neighborhoods.
- Clustering of high density residential development along transit corridors.
- Revitalization of commercial areas.
- Preservation of open space.
- Elimination of land use conflicts.

The No Project Alternative would consist of the adopted Golden Hill Community Plan land use designations as they apply today. There have been no amendments to the adopted Golden Hill Community Plan since adoption.

The adopted Golden Hill Community Plan is intended to preserve and enhance the quality of housing opportunities for all income levels; maintain the distinctive architectural character and scale of the area; maintain the heritage of Golden Hill by retaining the character of residential neighborhoods and ensure that new development is in character and scale with the community; revitalize the existing retail commercial areas; preserve existing open space areas; and improve the overall appearance of the area by adopting urban design standards for compatible housing design, streetscape improvements and commercial revitalization.

The majority of Golden Hill is designated for residential uses. South of A Street is primarily designated for Medium density (15-29du/ac) with higher density centering around Broadway at 29-44 and 44-73 du/ac. North of A Street is composed of Low density residential at 1-9 du/ac with modest increases in density along 30th (15-29 du/ac) and in the northeast corner of the community (10-15 du/ac).

In Golden Hill, 25th Street and 30th Street contain the community's commercial centers allowing mixed use development up to 29 du/ac. 25th Street is a four block commercial area from the 94 Freeway to B Street and 30th Street, the community's main north south corridor, contains commercial areas defined by Cedar and Beech Streets, Grape and Juniper Streets, and small neighborhood commercial lots south of A Street. A Neighborhood Commercial center is also located at 28th and B Street. The residential area centered along the Broadway corridor between 26th Street and 31st Street from C Street to as far south as the 94 Freeway is proposed for lower density residential uses.

Table 12-2 presents a summary of the residential capacity and reasonably anticipated non-residential development under the No Project Alternative. Table 12-3 presents the proposed Golden Hill CPU for comparison. Figure 7.1-1 shows the adopted Community Plan land use.

Table 12-2
Build-out Under the No Project Alternative For Golden Hill

Land Use	Acres	Dwelling Units	Floor Area
Education	9	-	100,660
Institutional	7	-	112,380
Multi-Family	189	7,100	-
Office Commercial	2	-	37,160
Open Space	57	-	-
Retail Commercial	25	-	394,000
Roads	281	-	-
Single-Family	176	2,070	-
Grand Totals	**746**	**9,170**	**644,200**
Estimated Future Population	**23,890**		

Table 12-3 Build-out for the Proposed Golden Hill CPU			
Land Use	Acres	Dwelling Units	Floor Area
Education	9	-	100,660
Institutional	7	-	112,380
Multi-Family	~~189~~188	7,120	-
Office Commercial	2	-	37,160
Open Space	57	-	-
Retail Commercial	~~25~~23	-	356,800
Roads	281	-	-
Single-Family	~~176~~179	2,095	-
Grand Totals	**746**	**9,215**	**607,000**
Estimated Future Population	**24,010**		

12.1.2 Environmental Analysis

a. Land Use

The No Project Alternative would retain the adopted Community Plan. Land use impacts under this alternative would be similar to or greater than the anticipated impacts to the proposed Golden Hill CPU because the adopted Community Plan does not contain the proposed Golden Hill CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. While it would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact, it would not implement the City of Villages Strategy of the General Plan or the environmental goals, objectives, and guidelines of the General Plan's various elements to the same degree as the proposed Golden Hill CPU.

The adopted Community Plan's open space boundary was not precisely mapped and portions of the MHPA are mapped over existing residential. Thus, this alternative does not support the MSCP Subarea Plan to the same degree as the proposed Golden Hill CPU, which includes MHPA boundary corrections that remove areas designated as residential and adds open space areas, not in the MHPA now into the MHPA. The corrections proposed as part of the proposed North Park CPU would also add open space areas, which are not currently included, into the MHPA; and this would not occur under the No Project Alternative.

The adopted Community Plan would not include all of the proposed Golden Hill CPU policies supporting the Historical Resource protections. Though new development occurring under the No Project Alternative would be required to comply with the City's Land Development Code, this alternative would not benefit from the supplemental development regulations to create additional safeguards for specified historic preservation districts that are included with the proposed Golden Hill CPU and associated discretionary actions.

b. Visual Effects and Neighborhood Character

Potential visual effects and impacts to neighborhood character under the No Project Alternative would be similar to those anticipated under the proposed Golden Hill CPU. Generally, the No Project Alternative would produce similar bulk and scale development as the proposed Golden Hill CPU and associated discretionary actions, however, the No Project Alternative also would not include proposed Golden Hill CPU policies that reduce the impact of future development on community character, preserve historic resources, and preserve the structural and visual integrity of the areas' landform.

As with the proposed Golden Hill CPU and associated discretionary actions, the No Project Alternative would not propose any specific developments that would substantially alter existing or planned character or involve the grading or alteration of steep slopes, and all future development would be required to comply with existing regulations regarding grading activities. Therefore, impacts for the No Project Alternative would be less than significant.

c. Transportation

The No Project Alternative would generate a similar volume of vehicular trips than the proposed Golden Hill CPU. The No Project Alternative does not contain the proposed Golden Hill CPU policies intended to promote a multimodal network that encourages walking, bicycling, and use of transit. Nor does the No Project Alternative contain policies that support the policies of SANDAG's San Diego Forward. Impacts to individual intersections and roadway segments under the No Project Alternative would be similar to the proposed Golden Hill CPU, and both would result in significant and unavoidable impacts. The No Project Alternative would result in greater impacts associated with consistency with policies and plans supporting alternative transportation because the no project alternative would not be consistent with the goals and policies of the General Plan's City of Villages Strategy as well as the implementation strategy of the Climate Action Plan.

d. Air Quality

The No Project Alternative would retain the adopted Golden Hill Community Plan. Air Quality impacts under this alternative would be similar, or slightly greater than the anticipated impacts under the proposed Golden Hill CPU due to greater commercial land uses. However, like the proposed Golden Hill CPU, the No Project Alternative would not conflict with or obstruct implementation of the applicable air quality plan, nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. Thus, impacts of the No Project Alternative would be similar to the proposed Golden Hill CPU.

e. Greenhouse Gases

The proposed Golden Hill CPU would generate similar or slightly reduced GHG emissions over those of the adopted Community Plan. This decrease in GHG would be a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus,

impacts associated with GHG emissions for the No Project Alternative would be greater than the impacts of the proposed Golden Hill CPU.

f. Noise

The No Project Alternative would retain the adopted Golden Hill Community Plan. Noise impacts under this alternative would be similar to the anticipated impacts under the proposed Golden Hill CPU because like the proposed Golden Hill CPU development under the adopted Golden Hill Community Plan could impact sensitive noise receptors. While the No Project Alternative does not contain the proposed Golden Hill CPU policy changes intended to improve compatibility with and implement the San Diego General Plan that could mitigate some impacts, both the No Project Alternative and the proposed Golden Hill CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24. However, the resulting noise impacts for both the No Project Alternative and the proposed Golden Hill CPU would remain significant and unavoidable.

g. Historical Resources

The No Project Alternative would retain the adopted Golden Hill Community Plan with no additional discretionary actions, including the supplemental development regulations for potential historic districts. Included with the proposed Golden Hill CPU discretionary actions is an amendment to the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. These supplemental development regulations would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts.

As with the proposed Golden Hill CPU, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 7.7, Historical Resources. The extent of impacts to archaeological resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development, implementation of the No Project Alternative would result in potentially significant impacts related to archaeological resources at the program level, similar to the proposed Golden Hill CPU.

h. Biological Resources

Under the No Project Alternative the boundary corrections proposed in the proposed Golden Hill CPU would have to go forward as a separate action and until this action was completed it is likely that the amount of preserved open space would be less. As such, the No Project Alternative would result in slightly greater impacts to biological resources than those anticipated under the proposed Golden Hill CPU, as less open space would be preserved. Implementation of the No Project Alternative would require that all subsequent development projects adhere to all applicable federal, state, and local regulations regarding the protection of biological resources. Therefore, impacts

under this alternative would be similar, but slightly greater than those identified for the proposed Golden Hill CPU, because less developable land would be converted to open space and development patterns would remain as they are today.

i. Geology Conditions

Similar to the proposed Golden Hill CPU and associated discretionary actions, potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the California Building Code, the San Diego Municipal Code, and the Seismic Hazards Mapping Act. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements would ensure that future grading and construction activities would avoid significant soil erosion impacts. Impacts from the No Project Alternative would be similar to than those of the proposed Golden Hill CPU.

j. Paleontological Resources

As with the proposed Golden Hill CPU, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources. Implementation of future projects under this alternative would require adherence to all applicable local regulations and guidelines further described in Section 7.10, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed Golden Hill CPU because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed Golden Hill CPU, implementation of the No Project Alternative would result in potentially significant impacts related to paleontological resources at the program level and impacts would be similar.

k. Hydrology and Water Quality

The land use pattern and distribution for the No Project Alternative is generally the same as the proposed Golden Hill CPU. Future development would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level; thus, impacts under both the No Project Alternative and the proposed Golden Hill CPU would be similar.

l. Public Services and Facilities

The No Project Alternative would retain the adopted Golden Hill Community Plan. Impacts to Public Services and Facilities under this alternative would be similar or lesser than the anticipated impacts associated with the proposed Golden Hill CPU because the anticipated population at build-out of the No Project Alternative would be slightly less than the anticipated population for the build-out of the proposed Golden Hill CPU. For police and fire protection services, the difference in population would not impact either the police or fire department in their ability to provide service, nor would the departments require the construction of new facilities. For both the No Project Alternative and the

proposed Golden Hill CPU, future projects would be required to pay for any potential impacts to schools reducing these impacts to less than significant. Similarly, both the No Project Alternative and the proposed Golden Hill CPU include financing mechanisms to provide for libraries. However, in the case of both the No Project Alternative and the proposed Golden Hill CPU there results in a deficit in population based parks and the need to build new recreational facilities. Construction of new facilities would require separate environmental review and if required mitigation, so the impacts of new construction of new facilities for both the No Project Alternative and the proposed Golden Hill CPU would be less than significant. Thus, the No Project Alternative would result in similar impact as the proposed Golden Hill CPU.

m. Public Utilities

The No Project Alternative would retain the adopted Golden Hill Community Plan. Impacts to Public Utilities under this alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU. Although the No Project Alternative does not contain the proposed community Golden Hill CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan, the anticipated population at build-out of the No Project Alternative is smaller than the anticipated population of the proposed Golden Hill CPU. Although the proposed Golden Hill CPU would have a larger anticipated population than the No Project Alternative, as discussed in section 7.13, Public Utilities, the implementation of the proposed Golden Hill CPU would not result in significant impacts to storm water, sewer, water, communications, solid waste and recycling, or energy. Therefore, the impacts for the No Project Alternative would be similar to the proposed Golden Hill CPU.

n. Health and Safety

Impacts from the No Project Alternative would be similar or slightly less than the proposed Golden Hill CPU. Future development under the No Project Alternative has the potential to result in exposure to hazardous materials, wastes, or emissions; airport hazards, and fire hazards. As the No Project Alternative would result in a slighter lower population growth than the proposed Golden Hill CPU, there would be fewer people exposed to these potential hazards. Additionally, there would not be any areas of change or land use changes that would increase potential exposure to hazards. Federal, state and local regulations that serve to reduce impacts a less-than-significant level would also cover the No Project alternative. Overall, impacts would be less than significant and somewhat less than those anticipated under the proposed Golden Hill CPU.

12.2 Higher-Density Alternative for Golden Hill CPU

12.2.1 Description

The Higher-Density Alternative utilizes the proposed Golden Hill CPU policies and increases density along the 25th Street commercial corridor and the City's Operation Yard to 44 du/ac. This Alternative would increase densities in line with the goal of facilitating transit-oriented development and a range of housing types.

Both the Higher-Density Alternative and the proposed Golden Hill CPU allows for 44 du/ac and limited commercial at the City's operation yard located at the northwestern edge of the community. The proposed Golden Hill CPU expands the institutional uses including the fire station and Golden Hill Elementary School. The open space network is more clearly defined in the proposed Golden Hill CPU and shows a network of canyons along the eastern side of Golden Hill.

Table 12-4 presents a summary of the residential capacity and reasonably anticipated non-residential development under the Higher-Density Alternative. Figure 12-1 shows the proposed land use designations under this Alternative. It should be noted that as a result of proposing higher densities the number of single-family units at build-out would decrease in comparison to the proposed Golden Hill CPU.

Table 12-4
Build-out Under the Alternative 1: Higher-Density Alternative for Golden Hill CPU

Land Use	Acres	Dwelling Units	Floor Area
Education	9	-	100,665
Institutional	7	-	112,379
Multi-Family	189	7,265	-
Office Commercial	2	-	37,160
Open Space	57	-	-
Retail Commercial	25	-	394,023
Roads	281	-	-
Single-Family	176	2,070	-
Grand Totals	**746**	**9,335**	**644,227**
Estimated Future Population =	**24,350**		

Map Source: SanGIS



FIGURE 12-1
Higher-Density Alternative – Golden Hill

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12.2.2 Environmental Analysis

a. Land Use

The Higher-Density Alternative would retain the proposed Golden Hill CPU land uses but would increase intensity within specific commercial nodes. While the overall amount of single-family units would decline as this alternative would be built out, the land use impacts under this alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU. While the Higher-Density Alternative would facilitate transit-oriented development and mixed use development to a greater degree than the proposed Golden Hill CPU, the land use changes are intended to improve compatibility with and implement the San Diego General Plan. Like the proposed Golden Hill CPU, this alternative would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact.

b. Visual Effects and Neighborhood Character

Potential visual effects and impacts to neighborhood character under the Higher-Density Alternative would be similar to those anticipated under the proposed Golden Hill CPU. Like the proposed Golden Hill CPU, the Higher-Density Alternative includes increases in density, generally the proposed Golden Hill CPU and the Higher-Density Alternative would produce similar bulk and scale development. The Higher-Density Alternative would also include proposed Golden Hill CPU policies that would reduce the impact of future development on community character and related visual effects. The overall impact would be similar to the proposed Golden Hill CPU.

c. Transportation

The Higher-Density Alternative would generate more vehicular trips than the proposed Golden Hill CPU. While the Higher-Density Alternative would contain the proposed Golden Hill CPU policies intended to promote a multimodal network that encourage walking, bicycling, and taking transit, the impacts to individual intersections and roadway segments would be greater than the proposed Golden Hill CPU.

d. Air Quality

The Higher-Density Alternative would increase the amount of traffic generated. As such, Air Quality impacts under this alternative would be greater than the anticipated impacts under the proposed Golden Hill CPU. Like the proposed Golden Hill CPU, the Higher-Density Alternative would not conflict with or obstruct implementation of the applicable air quality plan nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. However, the Higher-Density Alternative's future operational emissions would be greater than those of the proposed Golden Hill CPU. Because the land use changes associated with the Higher-Density Alternative would result in an effective increase in emissions, the impacts of the Higher-Density Alternative would be greater than the proposed Golden Hill CPU.

e. Greenhouse Gases

The Higher-Density Alternative would increase density compared to the proposed Golden Hill CPU because it adds approximately 120 additional units. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions from the Higher-Density Alternative would be similar to the proposed project.

f. Noise

The Higher-Density Alternative would result in increased densities along certain commercial corridors. Noise impacts under this alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU because like the proposed Golden Hill CPU the Higher-Density Alternative would permit development that could impact sensitive noise receptors. Both the Higher-Density Alternative and the proposed Golden Hill CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24; however, the increase in development could expose sensitive receptors to increase noise levels. Therefore, resulting noise impacts for the Higher-Density Alternative would be the same as the proposed Golden Hill CPU.

g. Historical Resources

The Higher- Density Alternative would retain the proposed implementation of interim protection measures to preserve the integrity and eligibility of potential historic districts. As with the proposed Golden Hill CPU, this alternative would amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. The supplemental development regulations would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts.

Therefore, this Alternative is consistent with the policies of the proposed Golden Hill CPU Historic Preservation Element to provide additional protection for potential historic districts, but like the proposed Golden Hill CPU it is impossible to ensure the successful preservation of all historical resources within the Golden Hill CPU area. Therefore, potential impacts to the historical resources from implementation of the Higher-Density Alternative remain significant and unavoidable like the proposed Golden Hill CPU.

As with the proposed Golden Hill CPU, future development under the Higher-Density Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 7.7, Historical Resources. The extent of impacts to archaeological resources resulting from implementation of the Higher-Density Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed Golden Hill CPU, implementation of the Higher-Density Alternative would result in potentially significant impacts related to archaeological resources at the program level.

h. Biological Resources

The Higher-Density Alternative would include the same boundary corrections as the proposed Golden Hill CPU. Therefore, the Higher-Density Alternative would result in similar impacts to biological resources as those anticipated under the proposed Golden Hill CPU. Implementation of the Higher-Density Alternative would require that all subsequent development project submittals adhere to all applicable federal, state, and local regulations regarding the protection of biological resources. Therefore, impacts under this Alternative would be similar to those identified for the proposed Golden Hill CPU, which are less than significant.

i. Geology Conditions

Impacts from the Higher-Density Alternative would be similar to those of the proposed Golden Hill CPU. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the California Building Code, the San Diego Municipal Code, and the Seismic Hazards Mapping Act. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements and compliance with applicable State and/or Federal regulations would ensure that future grading and construction activities would avoid significant soil erosion impacts.

j. Paleontological Resources

As with the proposed Golden Hill CPU, future development under the Higher-Density Alternative has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources. Implementation of future projects under this alternative would require adherence to all applicable local regulations and guidelines further described in Section 7.10, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the Higher-Density Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed Golden Hill CPU, implementation of the Higher-Density Alternative would result in potentially significant impacts related to paleontological resources at the program level.

k. Hydrology and Water Quality

The land use pattern and distribution for the Higher-Density Alternative is generally the same as the proposed plan. Like the proposed Golden Hill CPU, the Higher-Density Alternative would implement the boundary corrections s proposed in the Golden Hill CPU which is likely to preserve the same amount of open space. Future development would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level; thus, impacts under both the Higher-Density Alternative and the proposed Golden Hill CPU would be similar.

l. Public Services and Facilities

Impacts to Public Services and Facilities under the Higher-Density Alternative would be similar or greater than the anticipated impacts to the proposed Golden Hill CPU because the anticipated population at build-out of the Higher-Density Alternative would be more than the anticipated population for the build-out of the proposed Golden Hill CPU. For police and fire protection services, the difference in population would not impact either the police or fire department in their ability to provide service, nor would the departments require the construction of new facilities. For both the Higher-Density Alternative and the proposed Golden Hill CPU, future projects would be required to pay for any potential impacts to schools reducing these impacts to less than significant. Similarly, both the High Density Alternative and the proposed a Golden Hill CPU include financing mechanisms to provide for libraries. Under both the Higher-Density Alternative and the proposed Golden Hill CPU there results in a deficit in population based parks and the need to build new recreational facilities. Impacts of the Higher-Density Alternative would be similar or slightly greater than the proposed Golden Hill CPU.

m. Public Utilities

Impacts to Public Utilities under this Alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU. Like the proposed Golden Hill CPU, the Higher-Density Alternative contains the proposed community Golden Hill CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. The anticipated population at build-out of the Higher-Density Alternative is greater than the anticipated population of the proposed Golden Hill CPU. As discussed in section 7.13, Public Utilities, the implementation of the proposed Golden Hill CPU would not result in significant impacts to storm water, sewer, water, communications, solid waste and recycling, or energy. While it is anticipated that the population increase would be approximately 340 persons, the impacts to storm water, sewer, water, communications, solid waste and recycling, or energy would be similar to the proposed Golden Hill CPU.

n. Health and Safety

Impacts from the Higher-Density Alternative would be similar to the proposed Golden Hill CPU. Future development under the Higher-Density Alternative has the potential to result in exposure to hazardous materials, wastes, or emissions; airport hazards, and fire hazards. As the Higher-Density Alternative would result in a slighter higher population growth than the proposed plan, there could be more people exposed to these potential hazards; however, Federal, state and local regulations would minimize impacts to a less than significant level. Thus, the Higher-Density Alternative would have similar impacts as the proposed Golden Hill CPU.

12.3 Lower-Density Alternative

12.3.1 Description

The Lower-Density Alternative maintains land uses which are similar to the proposed Golden Hill CPU except in two areas. The Lower-Density Alternative further lowers density along the Broadway Corridor from 30-44 du/ac to 16-29 du/ac, maintains the City's Operation Yard to 29 du/ac and does not specify limited commercial in the City's Operation Yard could be included. However, the density of future development would be lower under this alternative, resulting in less overall development.

Table 12-5 presents a summary of the residential capacity and reasonably anticipated non-residential development under the Lower-Density Alternative. Figure 12-2 shows land use designations under this Alternative.

Table 12-5
Build-out Under Lower-Density Alternative for Golden Hill CPU

Land Use	Acres	Dwelling Units	Floor Area
Education	9	-	100,665
Institutional	7	-	112,379
Multi-Family	188	6,960	-
Office Commercial	2	-	37,160
Open Space	57	-	-
Retail Commercial	23	-	356,813
Roads	281	-	-
Single-Family	179	2,097	-
Grand Totals	**746**	**9,057**	**607,017**
Estimated Future Population	**23,600**		

Map Source: SanGIS



FIGURE 12-2
Lower-Density Alternative – Golden Hill

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12.3.2 Analysis of Alternative 2: Lower-Density Alternative for Golden Hill CPU

a. Land Use

The Lower-Density Alternative would retain the proposed Golden Hill CPU land uses but further lowers density along the Broadway Corridor, maintains the City's Operation Yard current density, and does not specify limited commercial in the City's Operation Yard. Land use impacts under this Alternative would be similar to the anticipated impacts of the proposed Golden Hill CPU. The Lower-Density Alternative would facilitate transit-oriented development and mixed use development but to a lesser degree than the proposed Golden Hill CPU. The land use changes are compatible with the implementation of the San Diego General Plan but to a lesser degree. Like the proposed Golden Hill CPU, it would not conflict with adopted land use plans, policies, or ordinances, and would thus have a less than significant impact.

b. Visual Effects and Neighborhood Character

Potential visual effects and impacts to neighborhood character under the Lower-Density Alternative would be similar to those anticipated under the proposed Golden Hill CPU. Unlike the proposed Golden Hill CPU, the Lower-Density Alternative is closer to the adopted Golden Hill Community Plan's densities. But like the proposed Golden Hill CPU, the Lower-Density Alternative would generally produce similar bulk and scale development. The Lower-Density Alternative would also include proposed Golden Hill CPU policies that reduce the impact of future development on community character. Impacts would be similar to the proposed Golden Hill CPU.

c. Transportation

The Lower-Density Alternative would generate fewer vehicular trips than the proposed plan. While the Lower-Density Alternative would contain the proposed Golden Hill CPU policies intended to promote a multimodal network that encourage walking, bicycling, and taking transit but to a lesser extent than the proposed Golden Hill CPU, the impacts to individual intersections and roadway segments would be less than the proposed Golden Hill CPU. However, because the impacts to individual intersections and roadway segments would not be fully mitigated, like the proposed Golden Hill CPU, these impacts would remain significant and unavoidable.

d. Air Quality

The Lower-Density Alternative would decrease the amount of traffic generated. Air Quality impacts under this Alternative would be less than the anticipated impacts to the proposed Golden Hill CPU. Like the proposed Golden Hill CPU, the Lower-Density Alternative would not conflict with or obstruct implementation of the applicable air quality plan, nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation. The Lower-Density Alternative's future operational emissions would be less than those of the proposed Golden Hill CPU.

e. Greenhouse Gases

The Lower-Density Alternative would decrease GHG emissions over those of the proposed Golden Hill CPU, as there would be approximately 158 fewer units when compared to the proposed Golden Hill CPU. The decrease in density in areas where residents would have convenient access to transit and commercial services would result in a potential conflict with the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Decreasing residential and commercial density in transit corridors and Community Villages within a TPA would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP and thus, impacts associated with GHG emissions would be greater than the proposed Golden Hill CPU.

f. Noise

The Lower-Density Alternative would result in decreased densities along certain commercial corridors. Noise impacts under this Alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU because, like the proposed Golden Hill CPU, development under the Lower-Density Alternative would impact sensitive noise receptors. Both the Lower-Density Alternative and the proposed Golden Hill CPU would follow City noise regulations as well as state regulations such as the Code of Regulations Title 24. The resulting noise impacts for both the Lower-Density Alternative and the proposed Golden Hill CPU would remain significant and unavoidable.

g. Historical Resources

The Lower-Density Alternative would permit less development and would retain the proposed implementation of interim protection measures to preserve the integrity and eligibility of potential historic districts. Like the proposed Golden Hill CPU, the Lower-Density Alternative would amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation. The supplemental development regulations would limit how and where modifications can be made on residential properties identified as potentially contributing to specified potential historic districts. While the Lower-Density Alternative could result in a reduced the number of proposed projects that would modify historical resources, like the proposed Golden Hill CPU it is impossible to ensure the successful preservation of all historical resources within the plan area. Therefore, potential impacts to the historical resources from implementation of the Lower-Density Alternative would remain significant and unavoidable like the proposed Golden Hill CPU.

As with the proposed Golden Hill CPU, future development under the Lower-Density Alternative has the potential to result in significant direct and/or indirect impacts to archaeological resources. Implementation of future projects under this Alternative would require adherence to all applicable local regulations and guidelines further described in Section 7.7, Historical Resources. The extent of impacts to archaeological resources resulting from implementation of the Lower-Density Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed Golden Hill CPU, implementation of the Higher-Density

Alternative would result in potentially significant impacts related to archaeological resources at the program level.

h. Biological Resources

The Lower-Density Alternative would include the boundary corrections of the proposed Golden Hill CPU, and would result in similar impacts to biological resources as those anticipated under the proposed Golden Hill CPU. Implementation of the Lower-Density Alternative would require that all subsequent development project submittals adhere to all applicable federal, state, and local regulations regarding the protection of biological resources. Therefore, impacts under this Alternative would be similar to those identified for the proposed Golden Hill CPU which are less than significant.

i. Geology Conditions

Impacts from the Lower-Density Alternative would be similar to those of the proposed Golden Hill CPU. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the California Building Code, the San Diego Municipal Code, and the Seismic Hazards Mapping Act. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements, and, if necessary, NPDES General Construction Storm Water Permit provisions and compliance with applicable State and/or Federal regulations would ensure that future grading and construction activities would avoid significant soil erosion impacts.

j. Paleontological Resources

As with the proposed Golden Hill CPU, future development under the Lower-Density Alternative has the potential to result in significant direct and/or indirect impacts to paleontological fossil resources. Implementation of future projects under this Alternative would require adherence to all applicable State and local regulations further described in Section 7.10, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the Lower-Density Alternative would be similar to those identified for the proposed Golden Hill CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed Golden Hill CPU, implementation of the Lower-Density Alternative would result in potentially significant impacts related to paleontological resources at the program level.

k. Hydrology and Water Quality

The land use pattern and distribution for the Lower-Density Alternative is generally the same as the proposed Golden Hill CPU. Like the proposed Golden Hill CPU, the Lower-Density Alternative would implement the boundary corrections proposed in the Golden Hill CPU which is likely to preserve which the same amount of open space. As the same amount of land would be developed with

impervious surfaces, this Alternative would result in similar impacts associated with hydrology, flooding, and water quality. Future development would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level, thus impacts under both the Lower-Density Alternative and the proposed Golden Hill CPU would remain less than significant

l. Public Services and Facilities

Impacts to Public Services and Facilities under the Lower-Density Alternative would be similar or less than the anticipated impacts to the proposed Golden Hill CPU because the anticipated population at build-out of the Lower-Density Alternative would be less than the anticipated population for the build-out of the proposed Golden Hill CPU. For police and fire protection services, the difference in population would not impact either the police or fire department in their ability to provide service, nor would the departments require the construction of new facilities. For both the Lower-Density Alternative and the proposed Golden Hill CPU, future projects would be required to pay for any potential impacts to schools reducing these impacts to less than significant. Similarly, both the Lower-Density Alternative and the proposed Golden Hill CPU include financing mechanisms to provide for libraries. In the case of both the Lower-Density Alternative and the proposed Golden Hill CPU there results in a deficit in population based parks and the need to build new recreational facilities. Construction of new facilities would require separate environmental review and if required mitigation, so the impacts of new construction of new facilities for both the Lower-Density Alternative and the proposed Golden Hill CPU would be similar. The anticipated population of the Lower-Density Alternative would require less new park land than the proposed Golden Hill CPU, but a deficit would remain. Like the proposed Golden Hill CPU, the impact from the deficit in park land would be less than significant.

m. Public Utilities

Impacts to Public Utilities under this Alternative would be similar to the anticipated impacts to the proposed Golden Hill CPU. Like the proposed Golden Hill CPU, the Lower-Density Alternative contains the proposed Golden Hill CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. The anticipated population at build-out of the Lower-Density Alternative is lower than the anticipated population of the proposed Golden Hill CPU. As discussed in section 7.13, Public Utilities, the implementation of the proposed Golden Hill CPU would not result in significant impacts to storm water, sewer, water, communications, solid waste and recycling, or energy. It is anticipated that the population in the Lower-Density Alternative would be approximately 410 fewer people than under the proposed Golden Hill CPU. Therefore, the impacts to storm water, sewer, water, communications, solid waste and recycling, or energy would be less than the proposed Golden Hill CPU and impacts under both would be less than significant.

n. Health and Safety

Impacts from the Lower-Density Alternative would be similar to the proposed Golden Hill CPU. Future development under the Lower-Density Alternative has the potential to result in exposure to hazardous materials, wastes, or emissions; airport hazards, and fire hazards. As the Lower-Density

Alternative would result in a slighter lower population growth than the proposed Golden Hill CPU, there would be fewer people exposed to these potential hazards. Federal, state and local regulations that serve to reduce impacts a less-than-significant level would also address potential impacts of the Lower-Density Alternative. Overall, impacts would be less than significant and similar to those anticipated under the proposed Golden Hill CPU.

12.4 Environmentally Superior Alternative for the Golden Hill CPU

As required under Section 15126.6 (e)(2) of the CEQA Guidelines, the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project.

Based on a comparison of the Alternatives' overall environmental impacts and their compatibility with the proposed Golden Hills CPU's goals and objectives, the Lower-Density Alternative would reduce impacts related to Transportation and Traffic, Air Quality, and Public Services and Facilities compared to the proposed Golden Hill CPU. Like the No Project Alternative, transportation impact would remain significant and unavoidable, although the extent of the impacts would be reduced due to lower traffic volumes. The Lower-Density Alternative would still result in significant and unavoidable impacts to Transportation. However, the Lower-Density Alternative does not support the full implementation of the General Plan's City of Villages Strategy of developing multi-modal centers that encourage walking, bicycling, and taking transit and contain a mixture of commercial and residential develop. The Lower-Density Alternative would not support the City of San Diego in achieving the GHG emissions reduction targets of the CAP and thus, impacts associated with GHG emissions would be potentially significant for the Lower-Density Alternative.

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Chapter 13
Mitigation Monitoring and Reporting Program

Section 15097 of the California Environmental Quality Act (CEQA) Guidelines requires that a Mitigation Monitoring and Reporting Program (MMRP) be adopted upon certification of an Environmental Impact Report (EIR) (including associated Findings), to ensure that the associated mitigation measures are implemented. The MMRP identifies the mitigation measures, specifies the entity (or entities) responsible for monitoring and reporting, and notes when in the process monitoring and reporting should be conducted. MMRPs for the North Park and Golden Hill Community Plan Updates are included as attachments to the Staff Report to be considered by the decision maker.

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Chapter 15
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Chapter 16
Certification

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