City of
San Diego
PLANNING
DEPARTMENT

Environmental & Resource
Analysis Division
619-235-5200

FINAL
ENVIRONMENTAL IMPACT REPORT

Project No. 346289
SCH No. 2013111017

SUBJECT: **GRANTVILLE FOCUSED PLAN AMENDMENT: CITY COUNCIL APPROVAL OF AN AMENDMENT TO THE NAVAJO COMMUNITY PLAN, GENERAL PLAN AMENDMENT, AND UPDATE TO THE PUBLIC FACILITIES FINANCING PLAN (PFFP); ADOPTION OF A REZONE ORDINANCE TO IMPLEMENT THE COMMUNITY PLAN AND AMENDMENT TO THE CITY'S LAND DEVELOPMENT CODE (LDC) GRANTVILLE COMMUNITY PLAN IMPLEMENTATION OVERLAY ZONE (CPIOZ)**. The Grantville Focused Planning Area (FPA) would be implemented through the adoption of four new Community Commercial (CC) zones (CC-2-5, CC-3-6, CC-3-8, and CC-3-9). The application of these zones, together with the amendment of the Grantville CPIOZ, will serve as the implementation tools to achieve the proposed land use amendments associated with the proposed FPA.

The proposed FPA area covers two (2) Community Plan Implementation Overlay Zones (CPIOZ) described in the Navajo Community Plan: Grantville-CPIOZ-Type A, and part of the existing San Diego River Subdistrict – CPIOZ Type B. The list of criteria for each CPIOZ has been included in the text of the amendment to the Navajo Community Plan; however, the Grantville CPIOZ-Type A area is the primary focus of the Community Plan Amendment for the Navajo Community Plan. The amended Grantville CPIOZ-Type A will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation, and allow for increased density of up to 109 dwelling-units per acre, for a maximum total of approximately 4,594 dwelling units, in the area surrounding the existing Grantville Trolley Station when certain criteria are met. Both areas will follow the CPIOZ guidance per Land Development Code Chapter 13, Article 2, Division 14.

The Navajo PFFP Update reflects the community's boundary, development assumptions at community build-out, a listing of capital improvements, and an updated fee schedule. The Development Impact Fees (DIFs) provide a funding source for public facilities projects in the Navajo Community and would be adopted in conjunction with the community plan amendment and certification of the PEIR.

The Grantville FPA area is located within the Navajo Community Planning area west of Interstate 15 (I-15) and north of I-8; bounded by the Admiral Baker Golf Course to the north and the San Diego River to the west. The FPA area consists of approximately 280 acres and is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue. Figure 2-2 highlights the limits of the proposed FPA area.

APPLICANT: City of San Diego – Planning Department

Update 12/18/2014:

Minor revisions have been made to the Final Environmental Impact Report (EIR) which are shown in a strikeout and underlined format. In accordance with California Environmental Quality Act (CEQA) Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact.

CONCLUSIONS:

Based on the analysis conducted for the project described above, the City has prepared the following Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) to inform public agency decision-makers 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 (State CEQA Guidelines Section 15121). As further described in the attached EIR, the City has determined that the project would have a significant environmental effect in the following areas(s): **Land Use (Noise Compatibility), Air Quality, Noise (Operational) and Transportation/Circulation.**

The proposed project would result in potentially significant but mitigable impacts to the following issue areas: **Noise (Construction), Biological Resources, Hydrology/Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, ~~Paleontological Resources,~~ Health and Safety,** and **Public Utilities (Solid Waste)**. The proposed project's impacts for the following issue areas were determined to be less than significant or no impact was identified: **Greenhouse Gas Emissions, Paleontological Resources, Visual Quality/Neighborhood Character, Public Services and Facilities, Agricultural and Forest Resources, Mineral Resources, and Population and Housing.**

MITIGATION, MONITORING AND PROGRAM:

A series of mitigation measures are identified within each issue area discussion in Section 5.0 of the PEIR to reduce environmental impacts. The mitigation measures are also fully contained in Section 11.0, Mitigation Monitoring and Reporting Program of the EIR for the following issue areas: **Land Use**, **Transportation/Circulation, Air Quality, Noise, Biological Resources, Hydrology/Water Quality, Historical Resources (Built Environment and Archaeological), Geologic Conditions, ~~Paleontological Resources,~~ Health and Safety, and Public Utilities.** The attached Environmental Impact Report and Technical Appendices document the reasons to support the above Determination.

RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS
Based on the requirement that alternatives reduce significant impacts associated with the proposed project, the EIR considers the following Project Alternatives which are further detailed in the Executive Summary and Chapter 10 of the EIR:

1. No Project (Adopted Community Plan)
2. Reduced Density Alternative (<43 dwelling units [du]/acre)
3. Reduced Density Alternative (<73 du/acre)
4. Alternative Site Location

Under CEQA Guideline Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. The EIR identified the Reduced Density Alternative (<43 dwelling units [du]/acre) as the environmentally superior alternative because it would meet the Project objectives while further reducing and avoiding impacts associated with land use (noise), transportation/circulation, air quality and noise (operational) when compared to the Project.

PUBLIC REVIEW DISTRIBUTION:

Individuals, organizations, and agencies that received a copy or notice of the Draft EIR and were invited to comment on its accuracy and sufficiency is provided below. Copies of the Draft EIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the office of the Planning Department, or purchased for the cost of reproduction.

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 Impact Report (EIR). No response is necessary and the letters are attached at the end of the EIR.

(X) Comments addressing the accuracy or completeness of the Draft Environmental Impact Report (EIR) were received during the public input period. The letters and responses are located immediately after the EIR Distribution List.

for Tom Tomlinson, Interim Director
Planning Department

December 19, 2014
Date of Draft Report

April 24, 2015
Date of Final Report

Analysts: Rebecca Malone/Kurtis Steinert

DISTRIBUTION OF DRAFT ENVIRONMENTAL IMPACT REPORT:

Copies of the Draft EIR were distributed to the following individuals, organizations, and agencies:

Federal Government:
Federal Aviation Administration (1)
U.S. Army Corps of Engineers (16)
U.S. Environmental Protection Agency (19)
U.S. Fish & Wildlife Service (23)
U.S. Army Corps of Engineers (26)

State of California
State Clearinghouse (46)
California Department of Transportation Planning - CALTRANS (31)
California Department of Fish & Wildlife (32)
Cal Recycle (35)
California Environmental Protection Agency (37A)
Housing and Community Development Department (38)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board: Region 9 (44)
Department of Water Resources (45)
Air Resources Board (49)
California Transportation Commission (51)
State Water Resources Control Board (55)
Native American Heritage Commission (56)
California Energy Commission (59)
California Highway Patrol (58)

County of San Diego
Air Pollution Control District (65)
County Water Authority (73)
Department of Environmental Health Services (74)
Department of Environmental Health Services – Hazardous Material (75)
Department of Environmental Health – Land and Water Quality Division (76)

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 Cates, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Councilmember Emerald, District 9
City Attorney's Office (MS 59)
Planning Department

Tom Tomlinson, Interim Director
Nancy Bragado, Deputy Director
Brian Schoenfisch, Program Manager
Myra Herrmann, Senior Environmental Planner
Rebecca Malone, Associate Environmental Planner
Seth Litchney, Senior Planner
Jenny An, Associate Planner
Kristy Forburger, Senior Planner, MSCP
Jeff Harkness, Park Planning
George Ghossain, Mobility Planning
Kelley Stanco, Senior Planner – Historical Resources
Frank January, Facilities Financing
Cathy Winterrowd

Development Services Department
Louis Schultz, Engineering Review
Ann Gonzalves, Transportation Development
Mehdi Rastakhiz, Water Review
Leonard Wilson, Wastewater Review
Patrick Thomas, Geology Review

Transportation & Storm Water Department
Ruth Kolb
Linda Marabian

Public Utilities Department
Anne Sasaki
Nicole McGinnis

Fire and Life Safety Services
Larry Trame
Michelle Abella-Shon

Police Department
Kevin Mayer

Park and Recreation Board (77)

Library Department – Government Documents (81)
Benjamin Branch Library (81D)
San Carlos Branch Library (81DD)

Park and Recreation Board (83)

Park Development (93)

Real Estates Assets (85)

Public Works Department
James Nagelvoort
Carrie Purcell

Historic Resources Board (87)

Wetland Advisory Board (91A)

Park & Recreation Department
Chris Zirkle

Community Forest Advisory Board (90)

Lisa Wood, Environmental Services Department (93A)

OTHER AGENCIES
San Diego Association of Governments (108)
San Diego County Regional Airport Authority (110)
San Diego Transit Corporation (112)
San Diego Gas & Electric (114)
San Diego Unified School District (125)
San Diego City Schools (132)
San Diego Community College District (133)

ENVIRONMENTAL/BIOLOGICAL ORGANIZATIONS
Sierra Club, San Diego Chapter (165)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
Environmental Heath Coalition (169)
California Native Plant Society (170)
San Diego Coast & Baykeeper (173)
Endangered Habitats League (182/182A)

HISTORICAL AND ARCHAEOLOGICAL ASSOCIATIONS
South Coastal Information Center (210)
San Diego History Center (211)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
San Diego County Archaeological Society (218)

TRIBAL DISTRIBUTION
Carmen Lucas (206)
Ron Christman (215)
Clint Linton (215B)
Frank Brown (216)
Campo Band of Mission Indians (217)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution – Public Notice Only (225A-S)
- Barona Group of Capitan Grande Band of Mission Indians
- Campo Band of Mission Indians
- Ewiiaapaayp Band of Mission Indians
- Inaja Band of Mission Indians
- Jamul Indian Village
- La Posta Band of Mission Indians
- Manzanita Band of Mission Indians
- Sycuan Band of Mission Indians
- Viejas Group of Capitan Grande Band of Mission Indians
- Mesa Grande Band of Mission Indians
- San Pasqual Band of Mission Indians
- Ipai Nation of Santa Ysabel

La Jolla Band of Mission Indians
Pala Band of Mission Indians
Pauma Band of Mission Indians
Pechanga Band of Mission Indians
Rincon Band of Luiseno Indians
San Luis Rey Band of Luiseno Indians
Los Coyotes Band of Mission Indians

CIVIC/PLANNING ORGANIZATIONS

Citizen's Coordinate for Century III (179)
San Diego Chamber of Commerce (157)
Building Industry Association (158)
Local 30 (191)
League of Women Voters (192)
Friends of Adobe Falls (335)
Navajo Community Planners, Inc. (336)
Navajo Community Service Center (337)
San Carlos Area Council (338)
San Diego River Conservancy (168)
San Diego River Foundation/Coalition (164)
Del Cerro Senior Social Club (339)
Mission Trails Regional Park (341)
Grantville Stakeholders Committee
Lynne Murray
Elise caster
Karen Ruggles
Jay Wilson
Brittany Ruggles
Rich Thesing
Daron Teemsma
Patricia Butler, BRG Consulting (Environmental Consultant)

Grantville Focused Plan Amendment
Final Programmatic Environmental Impact Report

Errata

Project Number 346289
SCH NO. 2013111017

For clarification, strikeout/underline has been used to identify changes in the final EIR when compared to the draft EIR,

Additionally, the City of San Diego has incorporated project features into the project subsequent to the draft public review and before the finalization of the EIR. These features include corrections to the draft EIR. These corrections are all within the project area, as reflected in Chapter 4, History of Project Changes, and will not result in any new physical effects.

Corrections:

1) Chapter 3.0 of the draft EIR included Figure 3.4, a map of the proposed rezone of the entire proposed FPA project area. A small portion on the northernmost section of Grantville was erroneously labeled as being rezoned. The final EIR includes an amended Figure 3.4 that shows the proposed zones in the entire project area. Figure 3.4 is now consistent with Figure 3.2. Table 3.1 has also been amended to reflect the correct acreage of each proposed zone within the project area and also includes right of way information for greater accuracy.
2) Section 5.12 has been updated to reflect the geological information for the proposed FPA. The project area has been reduced to be consistent with the Grantville CPIOZ Type-A area as identified by ordinance. The project area does not include any low, medium, or high sensitivity geology formations. No mitigation per this project is required and there is no impact as a result of this project. As a result of this finding, previously proposed mitigation has been removed from the Executive Summary, Section 5.12 and the Mitigation Monitoring and Reporting Program.

3) Section 5.15 Public Facilities and the PFFP have been updated to reflect the removal of the joint use park, Monumentum (formally Cleveland) school. The land was sold and is no longer available for use as joint use park.
4) 2.0 Environmental Setting, 5.7 Hydrology, and 5.8 Water Quality have been revised to include additional information regarding flooding at Alvarado Creek.
5) Mapping for flooding and MHPA have been updated per Letter F. Figure 5.1-1 and Figure 5.1-2 have been updated to reflect corrected information.
6) Pages ES-16, 5.2-39, 11-9 have been updated to reflect the RTP 2050.
7) Page 5.1-10 of the Final EIR has been amended to include the updated population forecast.
8) Page 5.14-8 has been updated to reflect the correct enrollment and capacity for Henry High School. This update does not change the conclusions of the EIR.
9) Table 5.2-5, Existing Freeway Segment Operations and Table 5.2-13a, Year 2030 with Existing Freeway Segment Operations have been updated with corrected headings.
10) Section 5.2.4.3 Mitigation Framework-Mainline Freeways Segment Mitigation Measures has been updated to reflect the RTP 2050.
11) Page 5.2-34 Transportation/Circulation has been updated to reflect CPIOZ A supplemental development regulations.
12) Mitigation for Biological Resources (Section 5.6) impacts has been revised to address comments regarding the enforceability of the mitigation. Mitigation ratio tables were added to the Biological Resources Section and removed from the Land Use Section (Section 5.1).
13) Mitigation Measures LU-1 and LU-2 have been removed because it was determined that these measures were redundant with respect to LU-3 (compliance with the MHPA Guidelines) and Mitigation Measure LU-3 has been renumbered to LU-1.
14) Geologic units that are not part of the project area were removed from Section 5.11, Geologic Conditions.

RESPONSE TO COMMENTS ON THE DRAFT EIR

The Draft Environmental Impact Report (Draft EIR) for the Grantville Focused Plan Amendment was distributed for public review on December 16, 2014, initiating a 60-day public review period ending on February 17, 2015. The document was made available online, at 3 public libraries throughout the City of San Diego, and at the City of San Diego's Development Services Department. During the public review period, a total of 16 letters and emails were received before the close of the public comment period. After the close of the public comment period, 2 more letters were submitted. Pursuant to California Environmental Quality Act (CEQA) Guidelines §15088(a), "the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response." All comment letters received on the Grantville Focused Plan Amendment, including the letter received after the close of the public comment period, were evaluated for environmental issues, and written responses to comments on environmental issues were prepared.

Table 1 provides a list of the comment letters received, including details on the agency, organization, or individual that submitted the letter and the date of the letter. This appendix presents written responses to comments on environmental issues raised in these letters. The written responses describe the disposition of significant environmental issues raised, as required by CEQA Guidelines §15088(c).

Table 1: List of Comment Letters on the Grantville Focused Plan Amendment

Letter No.	Agency/Organization/Individual	Letter Date	Page #
A	John Bennett	2/17/15	3
B	Brian Caster and Other Property Owners (multiple)	2/17/15	5
C	County of San Diego	2/17/15	18
D	Brian Desrosiers and Other Residents (multiple)	2/17/15	19
E	Four D Properties	2/17/15	22
F	H.G. Fenton*	2/20/15	28
G	Metropolitan Transit System	2/17/15	33
H	Navajo Community Planning Group	2/12/15	36
I	Pauma Band of Luiseno Indians	1/5/15	38
J	Potter and Associates	1/27/15	39
K	Ralph Richardson (1 of 2)	2/9/15	42
L	Ralph Richardson (2 of 2)	2/13/15	44
M	Marilyn Reed (1 of 2)	2/8/15	45
N	Marilyn Reed/Allied Gardens Community Council (2 of 2)	2/8/15	51
O	Kilian Roever*	2/18/15	55
P	San Diego Association of Governments	2/17/15	56
Q	San Diego Unified School District	12/29/14	61
R	Patricia Vollmer	1/23/15	64
S	California Department of Transportation	2/5/15	65

Notes:
* Letters F and O were received after the close of the public comment period. CEQA does not require a Lead Agency to respond to comments received after the close of the comment period; however, the City of San Diego has chosen to respond to all comments nonetheless.

For organizational purposes, each letter has been assigned letter identification as outlined in Table 1. Each comment letter is reproduced in its entirety and is aligned side-by-side with the response(s) to the letter. Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

February 17. 2015

Rebecca Malone

Environmental Planner, City of San Diego

1222 1st Avenue, MS 501

San Diego, CA 92101

RE: Comments on the Grantville Focused Plan Amendment (FPA):

I have reviewed the Grantville Focused Plan Amendment EIR and would like to comment on some of the issues identified in the noise analysis that are considered significant and unmitigable.

The section about existing conditions does not include any long term field measurements about the traffic noise conditions in the Grantville area. There was no such measurement for Interstate 8 on the south boundary or for Mission Gorge Road in the central portion of the project area. Such measurements provide a better understanding of the so-called peak hour noise conditions. There should be no confusion between the peak volume of traffic versus peak noise hour for this model and its assumptions. The concept of level of service (LOS) needs to be explained more since peak traffic volume may cause reduced speeds and decreased noise levels compared to a better level of service condition (unimpeded flow with higher speeds – LOS C). Depending on the day of the week, each peak noise hour episode in the morning and afternoon can often be prolonged to two or more hours. I have attached an example of a measurement taken in the Allied Gardens neighborhood overlooking Interstate 8 and the Grantville FPA area. For this reason, I believe that the future noise conditions may be underestimated in the TNM model in the vicinity of Interstate 8. Consequently, the proposed areas for rezoning to Urban Village and Business – Residential may need a requirement to buffer residential exterior noise sensitive land uses from traffic noise. A-1 A-2 A-3

I support the concept of transit oriented development (TOD) but I found no measurements or discussion about the Grantville Trolley station area. I have been to this station and found that the wall or barrier along Interstate 8 had a marginal noise reduction due to its height and the overhead structure of the trolley platform. About the FPA mitigation measures for exterior uses, my concern would not be about the STC A-4 A-5

Letter A
John Bennett

A-1: The noise study prepared for the EIR consisted of five monitoring stations which are sufficient to show the existing noise setting within the plan area. While a specific location could provide additional information as to that specific area, at the programmatic level the environmental setting for the plan area is adequate. Future development within the area near the I-8 will require noise studies for that location. Using the existing noise study it was determine that future development would after mitigation remain significant.

A-2: While there is a relationship between traffic and noise, the environmental setting in Section 5.5 is the existing conditions for noise. These conditions reflect all of the sources of noise including traffic. As to the impact analysis, the EIR shows that future development will be exposed to increased noise levels and after mitigation would remain significant.

A-3: The Supplemental Development Regulations provide additional provisions for noise sensitivity including increased setback, interior noise attenuation, and limiting exterior balconies particularly along Alvarado Canyon Road (roadway immediately north of I-8).

A-4: As shown in Figure 5.5-1 there was a monitoring location near the Grantville trolley station and the trolley is identified as a transportation noise source. The EIR shows (Figure 5.5-3) that the trolley station is within the 70 dBA noise contour. As to the existing noise barriers and the need for any future improvements these would be subject to future separate development project and environmental review.

A-5: The EIR identifies the Grantville CPIOZ section of the Navajo Community Plan as part of the FPA. The Grantville CPIOZ section requires submittal of a noise study, traffic calculations, and includes Supplemental Design Regulations regarding building articulation and noise mitigation for development along Alvarado Canyon Road.

rating of the walls and barriers but the overall size of any future structures to mitigate noise effectively and their visual appearance in any future residential neighborhood. The use of berms would help here but their footprint as well as their height were not estimated or discussed in the noise or visual analyses. There was no clear distinction between mitigation measures for exterior and interior noise sensitive land uses. Even at the program level, the EIR needs to provide a better estimate of these mitigation elements in the requirements for a good neighborhood design.

A-5 cont.

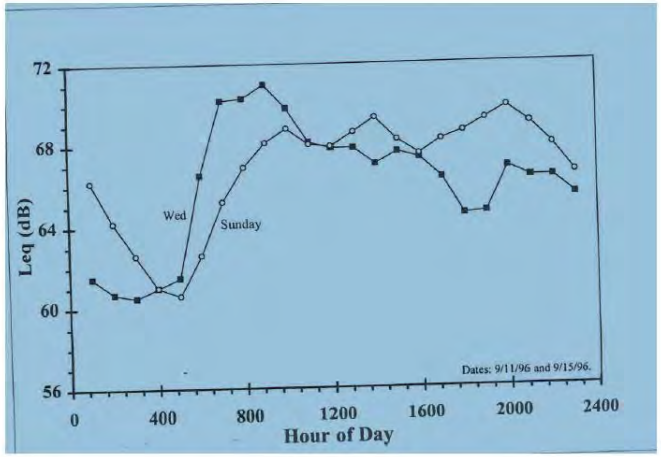
My final comment is that the Grantville FPA with the proposed rezoning needs to have additional guidelines that use buffering more effectively by choosing the appropriate type of development (i.e., screening by commercial and industrial structures) in the site plan process to protect future residential sites.

A-6

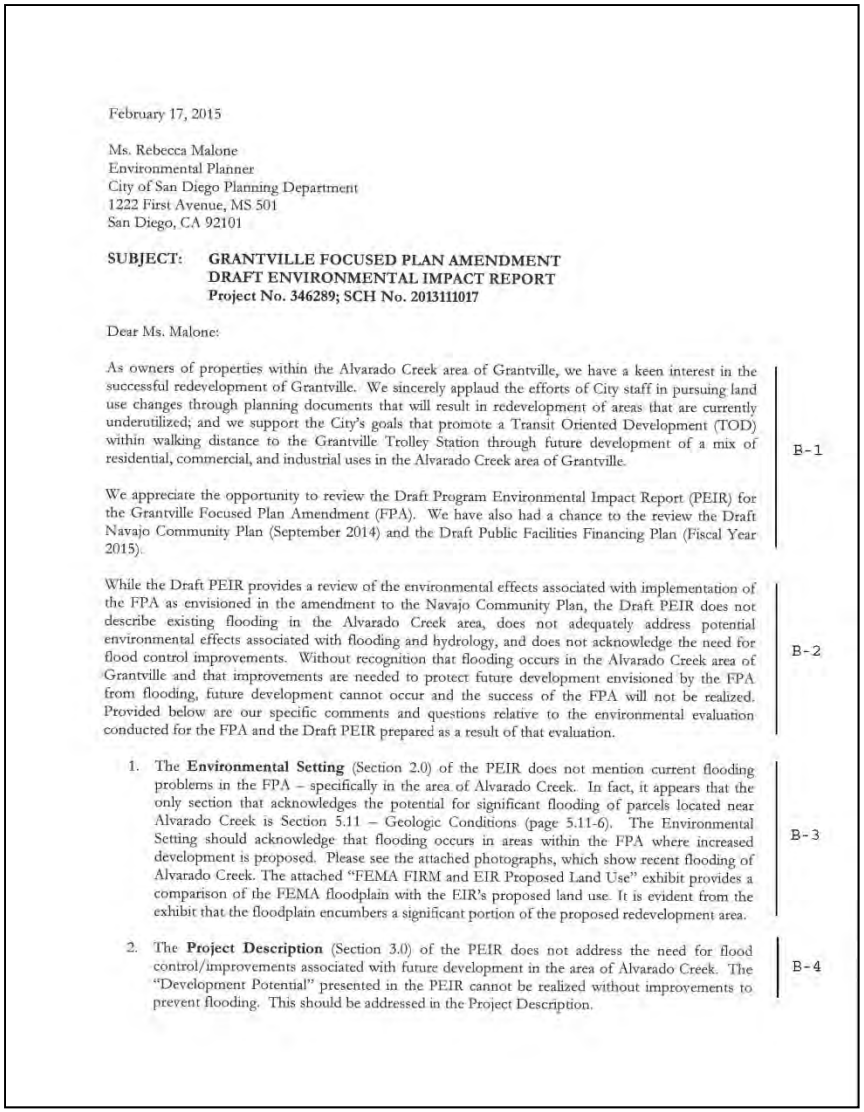
Thank you for this opportunity to comment on this EIR,

John Bennett, a resident of Allied Gardens

619-287-8331



A-6: The FPA includes the Grantville CPIOZ section that will be amended to the Navajo Community Plan. There are 40 supplemental design regulations that buffer development and protect future residential sites.



February 17, 2015

Ms. Rebecca Malone
Environmental Planner
City of San Diego Planning Department
1222 First Avenue, MS 501
San Diego, CA 92101

SUBJECT: GRANTVILLE FOCUSED PLAN AMENDMENT
DRAFT ENVIRONMENTAL IMPACT REPORT
Project No. 346289; SCH No. 2013111017

Dear Ms. Malone:

As owners of properties within the Alvarado Creek area of Grantville, we have a keen interest in the successful redevelopment of Grantville. We sincerely applaud the efforts of City staff in pursuing land use changes through planning documents that will result in redevelopment of areas that are currently underutilized; and we support the City's goals that promote a Transit Oriented Development (TOD) within walking distance to the Grantville Trolley Station through future development of a mix of residential, commercial, and industrial uses in the Alvarado Creek area of Grantville. B-1

We appreciate the opportunity to review the Draft Program Environmental Impact Report (PEIR) for the Grantville Focused Plan Amendment (FPA). We have also had a chance to the review the Draft Navajo Community Plan (September 2014) and the Draft Public Facilities Financing Plan (Fiscal Year 2015).

While the Draft PEIR provides a review of the environmental effects associated with implementation of the FPA as envisioned in the amendment to the Navajo Community Plan, the Draft PEIR does not describe existing flooding in the Alvarado Creek area, does not adequately address potential environmental effects associated with flooding and hydrology, and does not acknowledge the need for flood control improvements. Without recognition that flooding occurs in the Alvarado Creek area of Grantville and that improvements are needed to protect future development envisioned by the FPA from flooding, future development cannot occur and the success of the FPA will not be realized. Provided below are our specific comments and questions relative to the environmental evaluation conducted for the FPA and the Draft PEIR prepared as a result of that evaluation. B-2

1. The **Environmental Setting** (Section 2.0) of the PEIR does not mention current flooding problems in the FPA – specifically in the area of Alvarado Creek. In fact, it appears that the only section that acknowledges the potential for significant flooding of parcels located near Alvarado Creek is Section 5.11 – Geologic Conditions (page 5.11-6). The Environmental Setting should acknowledge that flooding occurs in areas within the FPA where increased development is proposed. Please see the attached photographs, which show recent flooding of Alvarado Creek. The attached "FEMA FIRM and EIR Proposed Land Use" exhibit provides a comparison of the FEMA floodplain with the EIR's proposed land use. It is evident from the exhibit that the floodplain encumbers a significant portion of the proposed redevelopment area. B-3

2. The **Project Description** (Section 3.0) of the PEIR does not address the need for flood control/improvements associated with future development in the area of Alvarado Creek. The "Development Potential" presented in the PEIR cannot be realized without improvements to prevent flooding. This should be addressed in the Project Description. B-4

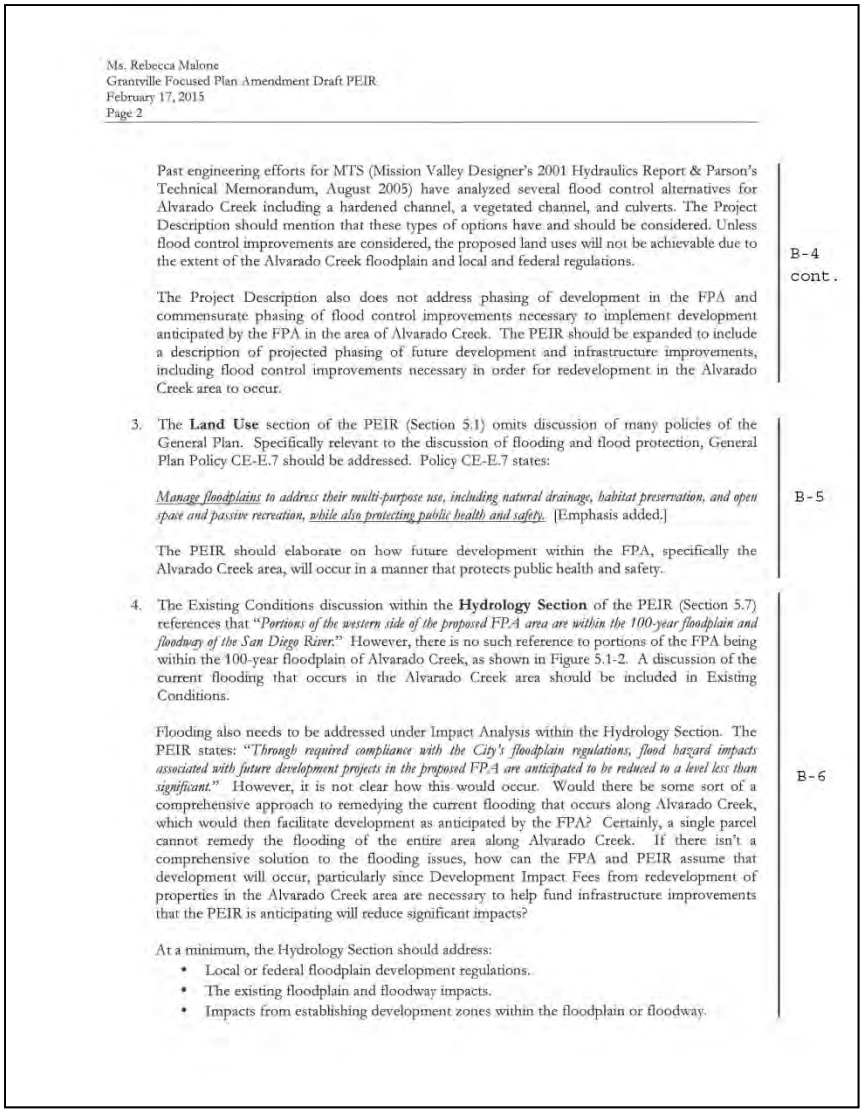
Letter B
Brian Caster and Other Property Owners

B-1: Comment Noted.

B-2: In the Final EIR, the Environmental Setting section has been revised to include a description of the flooding on Alvarado Creek.

B-3: Refer to B-2.

B-4: The proposed project involved an amendment to the Navajo Community Plan, revisions to the zoning code, the community plan implementation overlay zone, and revisions to the Navajo Public Facilities Financing Plan. Specific actions necessary to address the existing flooding condition are not a part of the project and therefore will not be included in the project description. In the Final EIR, the Hydrology and Environmental Setting sections will include language identifying the flooding hazard.



Ms. Rebecca Malone
Grantville Focused Plan Amendment Draft PEIR
February 17, 2015
Page 2

Past engineering efforts for MTS (Mission Valley Designer's 2001 Hydraulics Report & Parson's Technical Memorandum, August 2005) have analyzed several flood control alternatives for Alvarado Creek including a hardened channel, a vegetated channel, and culverts. The Project Description should mention that these types of options have and should be considered. Unless flood control improvements are considered, the proposed land uses will not be achievable due to the extent of the Alvarado Creek floodplain and local and federal regulations.

B-4 cont.

The Project Description also does not address phasing of development in the FPA and commensurate phasing of flood control improvements necessary to implement development anticipated by the FPA in the area of Alvarado Creek. The PEIR should be expanded to include a description of projected phasing of future development and infrastructure improvements, including flood control improvements necessary in order for redevelopment in the Alvarado Creek area to occur.

3. The **Land Use** section of the PEIR (Section 5.1) omits discussion of many policies of the General Plan. Specifically relevant to the discussion of flooding and flood protection, General Plan Policy CE-E.7 should be addressed. Policy CE-E.7 states:

Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety. [Emphasis added.]

B-5

The PEIR should elaborate on how future development within the FPA, specifically the Alvarado Creek area, will occur in a manner that protects public health and safety.

4. The Existing Conditions discussion within the **Hydrology Section** of the PEIR (Section 5.7) references that "*Portions of the western side of the proposed FPA area are within the 100-year floodplain and floodway of the San Diego River.*" However, there is no such reference to portions of the FPA being within the 100-year floodplain of Alvarado Creek, as shown in Figure 5.1-2. A discussion of the current flooding that occurs in the Alvarado Creek area should be included in Existing Conditions.

Flooding also needs to be addressed under Impact Analysis within the Hydrology Section. The PEIR states: "*Through required compliance with the City's floodplain regulations, flood hazard impacts associated with future development projects in the proposed FPA are anticipated to be reduced to a level less than significant.*" However, it is not clear how this would occur. Would there be some sort of a comprehensive approach to remedying the current flooding that occurs along Alvarado Creek, which would then facilitate development as anticipated by the FPA? Certainly, a single parcel cannot remedy the flooding of the entire area along Alvarado Creek. If there isn't a comprehensive solution to the flooding issues, how can the FPA and PEIR assume that development will occur, particularly since Development Impact Fees from redevelopment of properties in the Alvarado Creek area are necessary to help fund infrastructure improvements that the PEIR is anticipating will reduce significant impacts?

B-6

At a minimum, the Hydrology Section should address:

- Local or federal floodplain development regulations.
- The existing floodplain and floodway impacts.
- Impacts from establishing development zones within the floodplain or floodway.

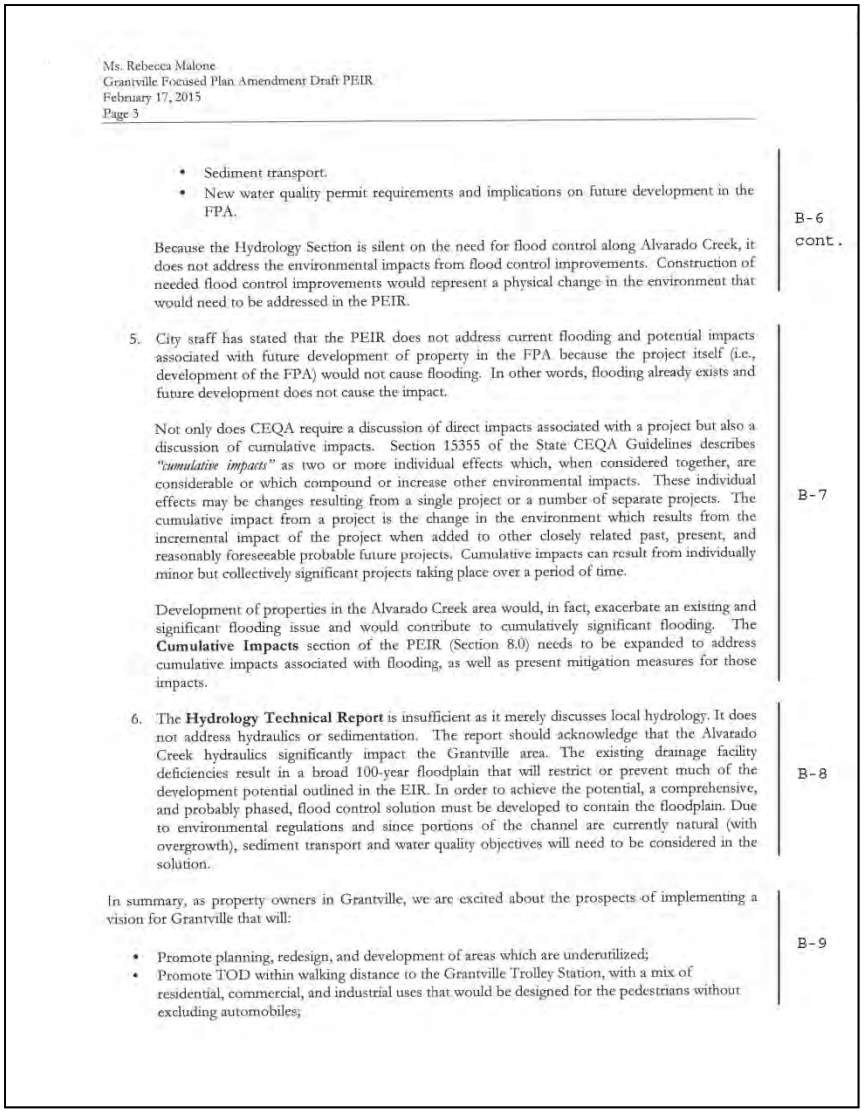
B-5: Since the project does not involve the direct management of a floodplain, General Plan Policy CE-E.7 will not be included in the Land Use section. Water Quality section 5.8 mentions General Plan Policy CE-E.7. Any future development proposal will be required to address flooding and all mitigation to comply with this policy.

B-6: The Hydrology section of the PEIR has been amended to include a discussion of the project's location in the floodplain of Alvarado Creek. The section will also refer to the Environmental Setting section for a description of the existing floodplain and floodway; however, the document will not discuss the impacts of flooding on future projects.

The City is applying for grants and other funding opportunities to address the existing flood conditions. The environmental impacts of those actions will be analyzed once the scope of the flood control projects is determined. Since the proposed FPA does not include any actions to address flooding, a discussion of the impacts of flood control projects is speculative. If sediment transport is affected by these projects, it will be analyzed at that time.

Since the existing floodplain is already currently developed, the impact of establishing development zones within the floodplain was not discussed. The Water Quality section notes that the volume of runoff within the proposed FPA area is not expected to increase and would probably decrease through the required implementation of Low Impact Development design.

The Water Quality section contains an analysis and mitigation measures pertaining to water quality permits for future development. Therefore, the Hydrology Section does not include this information.



Ms. Rebecca Malone
Grantville Focused Plan Amendment Draft PEIR
February 17, 2015
Page 3

- Sediment transport.
- New water quality permit requirements and implications on future development in the FPA.

B-6 cont.

Because the Hydrology Section is silent on the need for flood control along Alvarado Creek, it does not address the environmental impacts from flood control improvements. Construction of needed flood control improvements would represent a physical change in the environment that would need to be addressed in the PEIR.

5. City staff has stated that the PEIR does not address current flooding and potential impacts associated with future development of property in the FPA because the project itself (i.e., development of the FPA) would not cause flooding. In other words, flooding already exists and future development does not cause the impact.

   Not only does CEQA require a discussion of direct impacts associated with a project but also a discussion of cumulative impacts. Section 15355 of the State CEQA Guidelines describes *"cumulative impacts"* as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from a project is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

B-7

   Development of properties in the Alvarado Creek area would, in fact, exacerbate an existing and significant flooding issue and would contribute to cumulatively significant flooding. The **Cumulative Impacts** section of the PEIR (Section 8.0) needs to be expanded to address cumulative impacts associated with flooding, as well as present mitigation measures for those impacts.

6. The **Hydrology Technical Report** is insufficient as it merely discusses local hydrology. It does not address hydraulics or sedimentation. The report should acknowledge that the Alvarado Creek hydraulics significantly impact the Grantville area. The existing drainage facility deficiencies result in a broad 100-year floodplain that will restrict or prevent much of the development potential outlined in the EIR. In order to achieve the potential, a comprehensive, and probably phased, flood control solution must be developed to contain the floodplain. Due to environmental regulations and since portions of the channel are currently natural (with overgrowth), sediment transport and water quality objectives will need to be considered in the solution.

B-8

In summary, as property owners in Grantville, we are excited about the prospects of implementing a vision for Grantville that will:

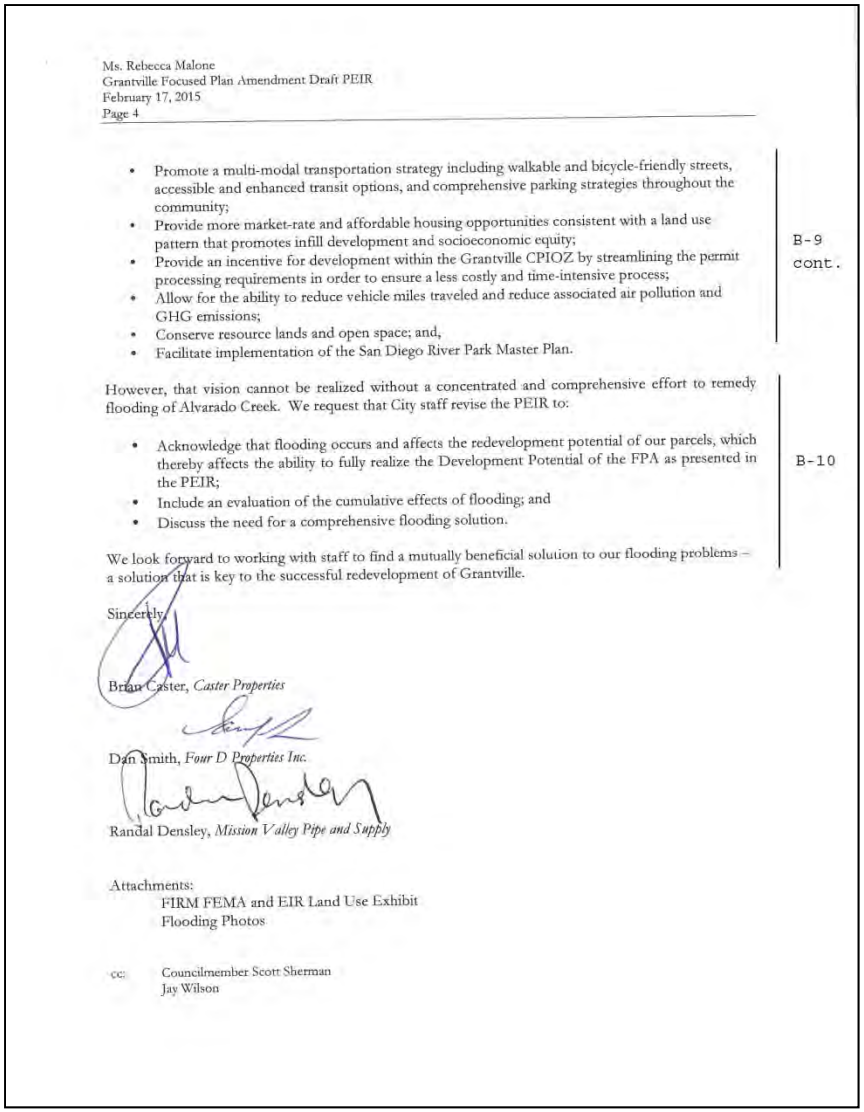
- Promote planning, redesign, and development of areas which are underutilized;
- Promote TOD within walking distance to the Grantville Trolley Station, with a mix of residential, commercial, and industrial uses that would be designed for the pedestrians without excluding automobiles;

B-9

B-7: While the proposed FPA would allow for increased density, the permitted land uses would occur in an area that is fully developed and nearly 87% impervious; therefore, the volume or rate of runoff is not likely to be increased by future development projects. Instead, the proposed land use changes would have some potential to slightly decrease the volume of storm water runoff because current storm water regulations would require implementation of Low Impact Development (LID) practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation. Therefore, flooding is not a cumulatively significant impact.

B-8: The City plans on applying for grants and other funding opportunities to address the existing flood conditions. The environmental impacts of those actions will be analyzed once the scope of the flood control projects is determined. Since the proposed FPA does not include any actions to address flooding, a discussion of the impacts of flood control projects is speculative. If sediment transport is affected by these projects, it will be analyzed at that time.

B-9: Comment noted.



Ms. Rebecca Malone
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- Promote a multi-modal transportation strategy including walkable and bicycle-friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout the community;
- Provide more market-rate and affordable housing opportunities consistent with a land use pattern that promotes infill development and socioeconomic equity;
- Provide an incentive for development within the Grantville CPIOZ by streamlining the permit processing requirements in order to ensure a less costly and time-intensive process;
- Allow for the ability to reduce vehicle miles traveled and reduce associated air pollution and GHG emissions;
- Conserve resource lands and open space; and,
- Facilitate implementation of the San Diego River Park Master Plan.

B-9 cont.

However, that vision cannot be realized without a concentrated and comprehensive effort to remedy flooding of Alvarado Creek. We request that City staff revise the PEIR to:

- Acknowledge that flooding occurs and affects the redevelopment potential of our parcels, which thereby affects the ability to fully realize the Development Potential of the FPA as presented in the PEIR;
- Include an evaluation of the cumulative effects of flooding; and
- Discuss the need for a comprehensive flooding solution.

B-10

We look forward to working with staff to find a mutually beneficial solution to our flooding problems – a solution that is key to the successful redevelopment of Grantville.

Sincerely,

Brian Caster, *Caster Properties*

Dan Smith, *Four D Properties Inc.*

Randal Densley, *Mission Valley Pipe and Supply*

Attachments:
FIRM FEMA and EIR Land Use Exhibit
Flooding Photos

cc: Councilmember Scott Sherman
Jay Wilson

B-10: In the Final EIR, the Environmental Setting section has been revised to include a description of the flooding on Alvarado Creek. The cumulative effects of flooding were found to be less than significant. The City will pursue a solution to the existing flooding condition once funding has been identified.

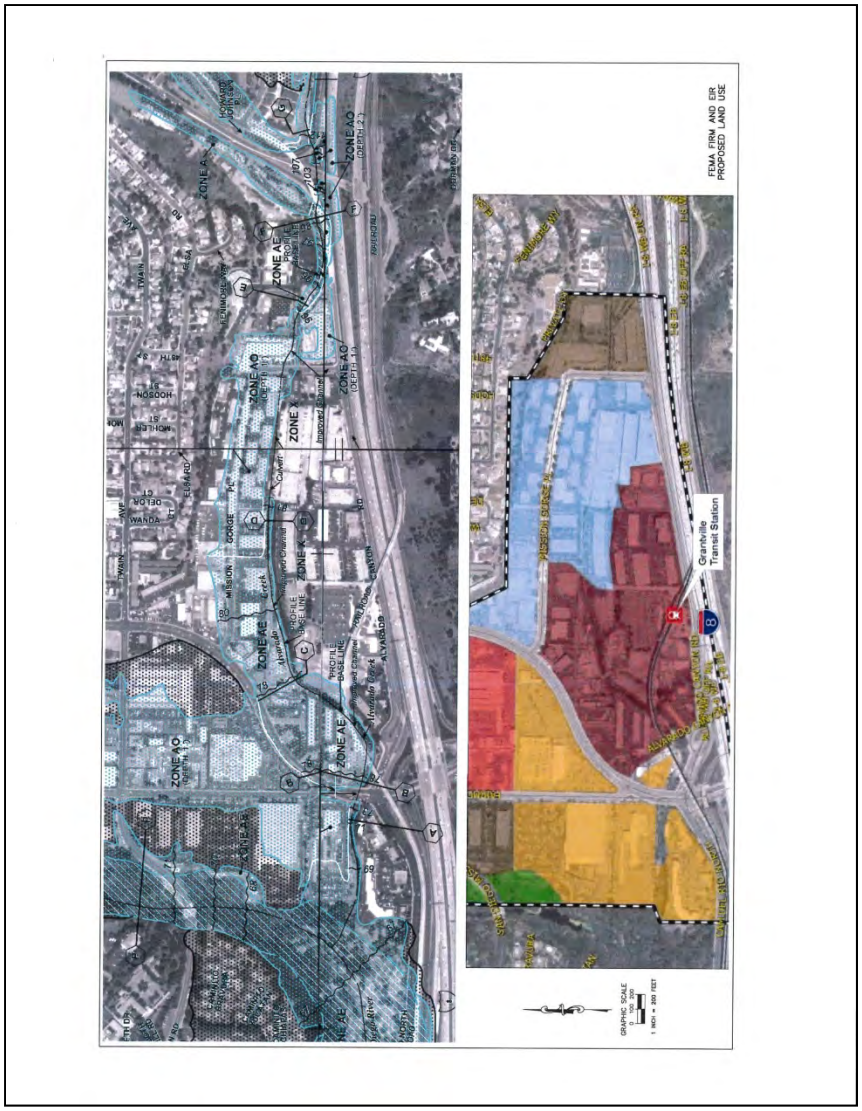


Exhibit viewed





Exhibit viewed





Exhibit viewed





Exhibit viewed





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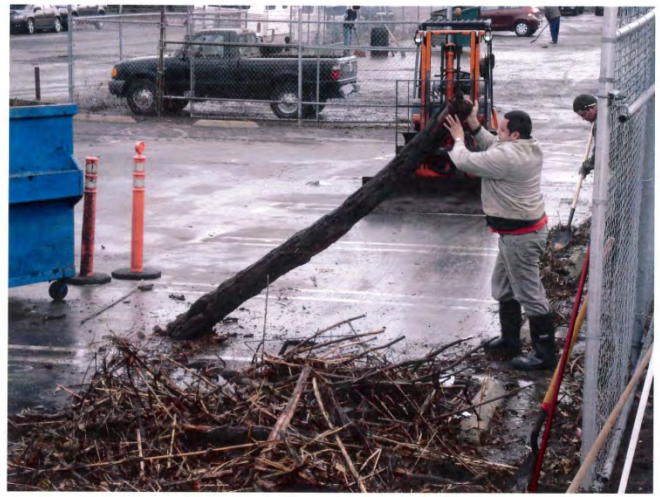




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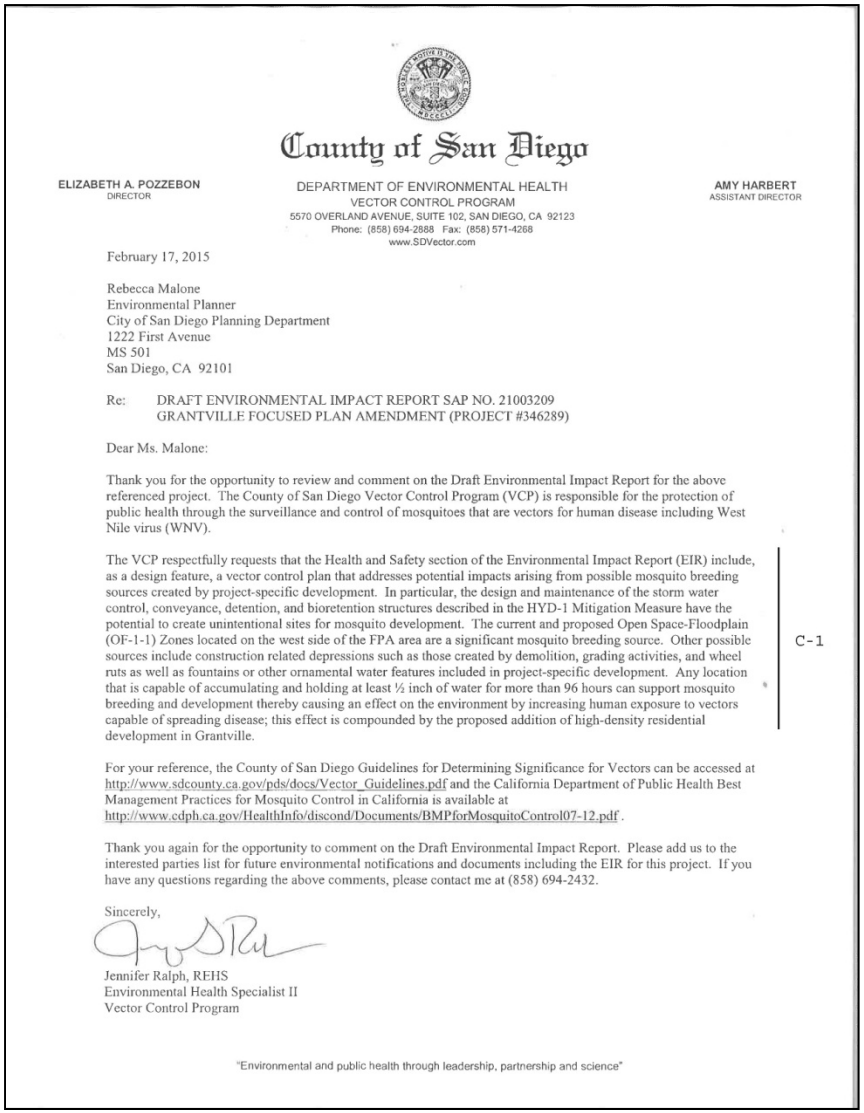


Exhibit viewed





Exhibit viewed



County of San Diego

ELIZABETH A. POZZEBON
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
VECTOR CONTROL PROGRAM
5570 OVERLAND AVENUE, SUITE 102, SAN DIEGO, CA 92123
Phone: (858) 694-2888 Fax: (858) 571-4268
www.SDVector.com

AMY HARBERT
ASSISTANT DIRECTOR

February 17, 2015

Rebecca Malone
Environmental Planner
City of San Diego Planning Department
1222 First Avenue
MS 501
San Diego, CA 92101

Re: DRAFT ENVIRONMENTAL IMPACT REPORT SAP NO. 21003209
GRANTVILLE FOCUSED PLAN AMENDMENT (PROJECT #346289)

Dear Ms. Malone:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report for the above referenced project. The County of San Diego Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV).

The VCP respectfully requests that the Health and Safety section of the Environmental Impact Report (EIR) include, as a design feature, a vector control plan that addresses potential impacts arising from possible mosquito breeding sources created by project-specific development. In particular, the design and maintenance of the storm water control, conveyance, detention, and bioretention structures described in the HYD-1 Mitigation Measure have the potential to create unintentional sites for mosquito development. The current and proposed Open Space-Floodplain (OF-1-1) Zones located on the west side of the FPA area are a significant mosquito breeding source. Other possible sources include construction related depressions such as those created by demolition, grading activities, and wheel ruts as well as fountains or other ornamental water features included in project-specific development. Any location that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development thereby causing an effect on the environment by increasing human exposure to vectors capable of spreading disease; this effect is compounded by the proposed addition of high-density residential development in Grantville.

C-1

For your reference, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at http://www.sdcounty.ca.gov/pds/docs/Vector_Guidelines.pdf and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf .

Thank you again for the opportunity to comment on the Draft Environmental Impact Report. Please add us to the interested parties list for future environmental notifications and documents including the EIR for this project. If you have any questions regarding the above comments, please contact me at (858) 694-2432.

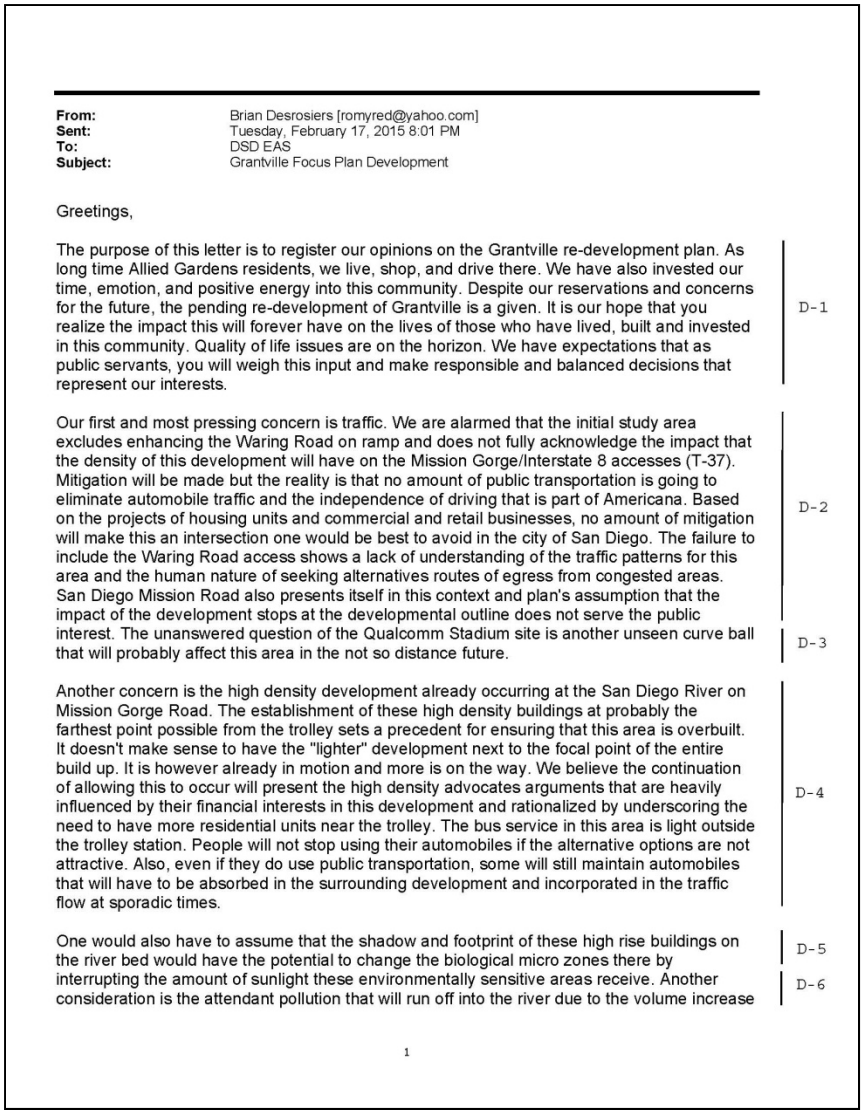
Sincerely,

Jennifer Ralph, REHS
Environmental Health Specialist II
Vector Control Program

"Environmental and public health through leadership, partnership and science"

Letter C
County of San Diego

C-1: The following was added to Mitigation Measure HYD-1, "To accommodate vector control, any measure used to control runoff or protect water quality shall ensure that it does not result in 0.5-inch or more of standing water for more than 96 hours."



From: Brian Desrosiers [romyred@yahoo.com]
Sent: Tuesday, February 17, 2015 8:01 PM
To: DSD EAS
Subject: Grantville Focus Plan Development

Greetings,

The purpose of this letter is to register our opinions on the Grantville re-development plan. As long time Allied Gardens residents, we live, shop, and drive there. We have also invested our time, emotion, and positive energy into this community. Despite our reservations and concerns for the future, the pending re-development of Grantville is a given. It is our hope that you realize the impact this will forever have on the lives of those who have lived, built and invested in this community. Quality of life issues are on the horizon. We have expectations that as public servants, you will weigh this input and make responsible and balanced decisions that represent our interests. D-1

Our first and most pressing concern is traffic. We are alarmed that the initial study area excludes enhancing the Waring Road on ramp and does not fully acknowledge the impact that the density of this development will have on the Mission Gorge/Interstate 8 accesses (T-37). Mitigation will be made but the reality is that no amount of public transportation is going to eliminate automobile traffic and the independence of driving that is part of Americana. Based on the projects of housing units and commercial and retail businesses, no amount of mitigation will make this an intersection one would be best to avoid in the city of San Diego. The failure to include the Waring Road access shows a lack of understanding of the traffic patterns for this area and the human nature of seeking alternatives routes of egress from congested areas. San Diego Mission Road also presents itself in this context and plan's assumption that the impact of the development stops at the developmental outline does not serve the public interest. The unanswered question of the Qualcomm Stadium site is another unseen curve ball that will probably affect this area in the not so distance future. D-2 D-3

Another concern is the high density development already occurring at the San Diego River on Mission Gorge Road. The establishment of these high density buildings at probably the farthest point possible from the trolley sets a precedent for ensuring that this area is overbuilt. It doesn't make sense to have the "lighter" development next to the focal point of the entire build up. It is however already in motion and more is on the way. We believe the continuation of allowing this to occur will present the high density advocates arguments that are heavily influenced by their financial interests in this development and rationalized by underscoring the need to have more residential units near the trolley. The bus service in this area is light outside the trolley station. People will not stop using their automobiles if the alternative options are not attractive. Also, even if they do use public transportation, some will still maintain automobiles that will have to be absorbed in the surrounding development and incorporated in the traffic flow at sporadic times. D-4

One would also have to assume that the shadow and footprint of these high rise buildings on the river bed would have the potential to change the biological micro zones there by interrupting the amount of sunlight these environmentally sensitive areas receive. Another consideration is the attendant pollution that will run off into the river due to the volume increase D-5 D-6

1

Letter D
Brian Desrosiers and Other Residents

D-1: Comment Noted.

D-2: Based on our modeling effort, regional access to the FPA area is primarily provided through the Fairmount Avenue and I-8 interchange and I-15 and Friars Road. Potential impacts to these locations have been disclosed in the traffic impact study and EIR. Mitigation measures to these locations have been coordinated with Caltrans and a near term and long term improvements have been identified and included in the facility financing plan.

D-3: Without a confirmed proposal on the site, any future development of Qualcomm Stadium would be speculative to include in this EIR.

D-4: The Grantville Focused Plan Amendment includes the development of a Community Plan Implementation Overlay Zone (CPIOZ). The Grantville CPIOZ is intended to encourage transit oriented developments which will minimize the need for an over reliance on automobiles and emphasize pedestrian orientation and proximity to public transit. It includes supplemental development regulations which reinforce the concept of an interconnection between development projects and the surrounding public transit system through significant physical and functional integration of project components, site design, and the provision of pedestrian and bicycle infrastructure. As development and redevelopment occurs over time, the plan envisions an elaborate pedestrian and bicycle circulation network linking new mixed use developments to the Grantville Trolley Station.

D-5: Current City design requirements include consideration of shadowing of adjacent uses. In addition, the City has specific requirements for development near sensitive environmental areas such as near San Diego River and other waterways. With the enforcement of the ordinance, it is anticipated that impacts associated with shadowing would be less than significant.

D-6: The Water Quality section of the EIR determined the following: With the adherence to the requirements of the Regional Water Quality Control Board and San Diego Municipal Code, including the requirements of the MS4 permit for the San Diego Region and the City's

of traffic and residents in this area. It's a given that these issues will be under served on the city's priority board after the project is completed. D-6 cont.

In regards to park space and sidewalks, it should be noted that both of these are not fully addressed. If the nature of building this type of density is to ensure all the residents needs are met, wouldn't it make sense to have an open green grass park in the central portion? The existing parkland in the surrounding areas will be negatively impacted by the higher number of residents and setting aside additional usable park space that is centrally located in the Grantville development would be good planning and show balance. The majority of park land surrounding the development zone is on the San Diego River and will have negligible recreational use for the residents. D-7

The sidewalks should consider at least one overpass or underpass to help alleviate the vast increases in traffic. Given the magnitude of the proposed development, it's hard to fathom why this is not being considered. D-8

It is a given that the vast majority of people participating in the development and building process have financial incentives or government positions that don't reflect the likelihood of their established presence of living in or around Grantville. As such, right or wrong, they will not be here to suffer any consequences that will most likely arise from building a high density development. No one will ever be held accountable for overbuilding but the residents will be punished by an aggrandized development that generates a Los Angeles style density. The potential to cripple the intersection of Mission Gorge Road and Interstate 8 is a reality that will be borne out with time and will never fully be experienced by the decision makers deciding the extent of this project. It is with that final thought that we encourage you to put yourselves in the place of residents and reduce the density to a sustainable 43 units per acre. D-9

This letter is written and blessed by all names and represents the feelings for all of us. We hope to convey the solidarity of our concerns and encourage you to contact any of us should you wish to do so.

Sincerely,

Brian and Monet Desrosiers
5469 Chaparajos Court
San Diego, CA 92120
619 286 8781

Lawrence F. and Judith A. Blick
5458 Chaparajos Court
San Diego, CA 92120
619 582 0997

Genoveva S. and Eugene Martinez Jr.
5452 Chaparajos Court
San Diego, CA 92120
619 286 9310

Ann Meador
5466 Chaparajos Court
San Diego, CA 92120
619 582 6947

2

D-6 con't: Storm Water Standards Manual; the implementation of Best Management Practices; the implementation of the Mitigation Framework detailed in HYD-1; and compliance with California Best Management Practices Handbook, potential water quality impacts associated with the construction of future development projects within the proposed FPA area would be reduced to a level less than significant.

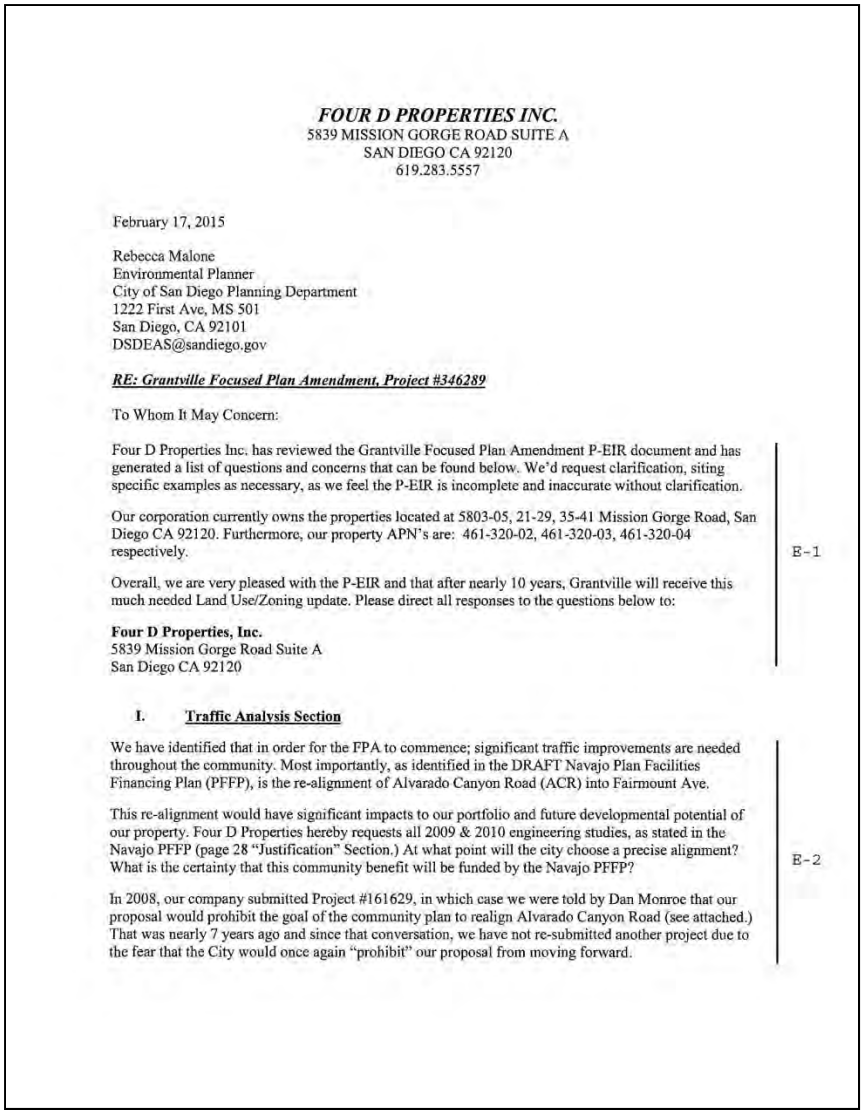
D-7: The Public Facilities section of the draft EIR used outdated information to calculate the impact of the project on park and recreation facilities. The Grantville Focused Plan Amendment includes changes to the Navajo Community Plan and the Navajo Public Facilities Financing Plan that add new park facilities to the community. The final EIR has been amended to state the following:

> At community build out the Navajo Community population will require approximately 204 acres of population-based parks. Through the community update process an additional 72.46 acres of park land was identified for future acquisition and development, resulting in a 7.76 acre surplus in the Navajo Community.

D-8: As future development occurs, the CPIOZ will require it emphasize pedestrian orientation and interconnection between development projects. While it is unknown whether a pedestrian overpass or underpass is necessary, it could be considered as part of a development proposal as long as it conforms to all applicable city laws and regulations.

D-9: Impact to Fairmount Avenue and I-8 interchange has been disclosed in the traffic impact study and EIR. Mitigation measures to this location have been coordinated with Caltrans and a near term and long term improvements have been identified and included in the facility financing plan.

As to the request for a specific density, this is a comment on the proposed FPA not the EIR. A reduced density alternative was analyzed in the PEIR and during their deliberations the decision makers had the ability to approve the density proposed or select the reduced density alternative.



FOUR D PROPERTIES INC.
5839 MISSION GORGE ROAD SUITE A
SAN DIEGO CA 92120
619.283.5557

February 17, 2015

Rebecca Malone
Environmental Planner
City of San Diego Planning Department
1222 First Ave, MS 501
San Diego, CA 92101
DSDEAS@sandiego.gov

RE: Grantville Focused Plan Amendment, Project #346289

To Whom It May Concern:

Four D Properties Inc. has reviewed the Grantville Focused Plan Amendment P-EIR document and has generated a list of questions and concerns that can be found below. We'd request clarification, siting specific examples as necessary, as we feel the P-EIR is incomplete and inaccurate without clarification.

Our corporation currently owns the properties located at 5803-05, 21-29, 35-41 Mission Gorge Road, San Diego CA 92120. Furthermore, our property APN's are: 461-320-02, 461-320-03, 461-320-04 respectively. E-1

Overall, we are very pleased with the P-EIR and that after nearly 10 years, Grantville will receive this much needed Land Use/Zoning update. Please direct all responses to the questions below to:

Four D Properties, Inc.
5839 Mission Gorge Road Suite A
San Diego CA 92120

I. Traffic Analysis Section

We have identified that in order for the FPA to commence; significant traffic improvements are needed throughout the community. Most importantly, as identified in the DRAFT Navajo Plan Facilities Financing Plan (PFFP), is the re-alignment of Alvarado Canyon Road (ACR) into Fairmount Ave.

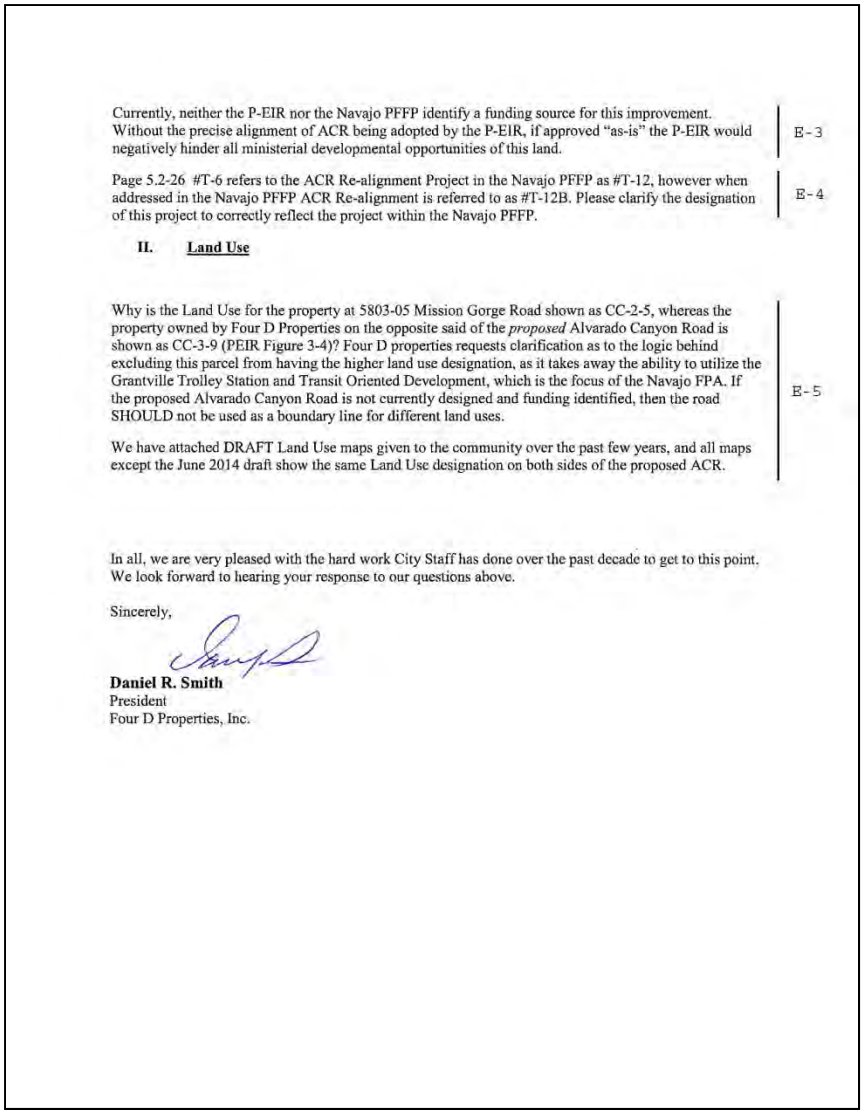
This re-alignment would have significant impacts to our portfolio and future developmental potential of our property. Four D Properties hereby requests all 2009 & 2010 engineering studies, as stated in the Navajo PFFP (page 28 "Justification" Section.) At what point will the city choose a precise alignment? What is the certainty that this community benefit will be funded by the Navajo PFFP? E-2

In 2008, our company submitted Project #161629, in which case we were told by Dan Monroe that our proposal would prohibit the goal of the community plan to realign Alvarado Canyon Road (see attached.) That was nearly 7 years ago and since that conversation, we have not re-submitted another project due to the fear that the City would once again "prohibit" our proposal from moving forward.

Letter E
Four D Properties

E-1: Comment noted.

E-2: In a previous collaborative effort between the City, Caltrans and Metropolitan Transit Development Board, it was determined that Alvarado Canyon Road should be realigned and moved northward to connect at Mission Gorge Road and Fairmount Avenue intersection. The objective of this re-alignment is to alleviate traffic congestion on the westbound I-8 off-ramps/Fairmount Avenue intersection and improve the overall traffic flow along Fairmount Avenue. The City has developed preliminary alignment alternatives to be studied. The preferred alignment of Alvarado Canyon Road will be determined at the project level subject to environmental review. Right of way (R-O-W) needed for the realignment project shall be accounted for as part of future project submitted for the Four D properties.



Currently, neither the P-EIR nor the Navajo PFFP identify a funding source for this improvement. Without the precise alignment of ACR being adopted by the P-EIR, if approved "as-is" the P-EIR would negatively hinder all ministerial developmental opportunities of this land. E-3

Page 5.2-26 #T-6 refers to the ACR Re-alignment Project in the Navajo PFFP as #T-12, however when addressed in the Navajo PFFP ACR Re-alignment is referred to as #T-12B. Please clarify the designation of this project to correctly reflect the project within the Navajo PFFP. E-4

II. Land Use

Why is the Land Use for the property at 5803-05 Mission Gorge Road shown as CC-2-5, whereas the property owned by Four D Properties on the opposite said of the *proposed* Alvarado Canyon Road is shown as CC-3-9 (PEIR Figure 3-4)? Four D properties requests clarification as to the logic behind excluding this parcel from having the higher land use designation, as it takes away the ability to utilize the Grantville Trolley Station and Transit Oriented Development, which is the focus of the Navajo FPA. If the proposed Alvarado Canyon Road is not currently designed and funding identified, then the road SHOULD not be used as a boundary line for different land uses. E-5

We have attached DRAFT Land Use maps given to the community over the past few years, and all maps except the June 2014 draft show the same Land Use designation on both sides of the proposed ACR.

In all, we are very pleased with the hard work City Staff has done over the past decade to get to this point. We look forward to hearing your response to our questions above.

Sincerely,

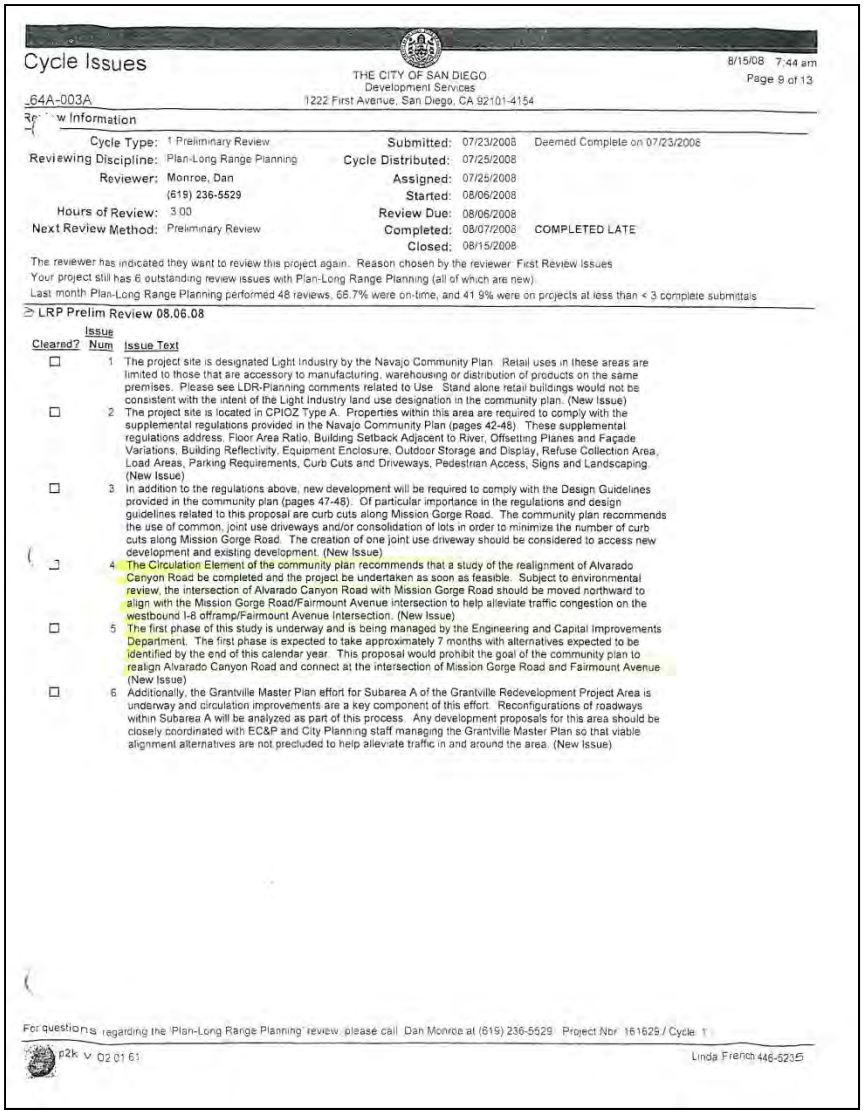
Daniel R. Smith
President
Four D Properties, Inc.

E-3: Funding source for this project will be a combination of fair share contribution granted that R-O-W for the construction of the re-alignment improvement is reserved. Other sources of funding could be pursued to supplement the fair share contribution collected by future development.

E-4: The re-alignment of ACR is one of the three phases programmed as part of the Fairmount Avenue and I-8 interchange improvement identified under PFFP project T-12.

E-5: The proposed land use for the area east of the proposed Alvarado Road alignment is Urban Village (44-109 DU/AC). The proposed zoning is CC-3-9. The proposed land use for area west of the proposed Alvarado Road alignment is Community Commercial and the zoning will be CC-2-5. The CC-2-5 designation is intended to accommodate development with a high intensity, pedestrian orientation. The zone allows community-serving uses with no residential uses. The CC-3-9 designation is intended to accommodate development with high intensity, pedestrian orientation, and the highest density. The zone focuses on a mix of pedestrian-oriented, community-serving commercial uses.

The CC-2-5 designation has been applied due to proximity to high noise and potential health impacts with significant residential development when considering adjacency to existing and future roadways. The Grantville CPIOZ identifies specific supplemental design regulations for properties along Alvarado Canyon Road and does allow for shopkeeper units.



Cycle Issues

THE CITY OF SAN DIEGO
Development Services
1222 First Avenue, San Diego, CA 92101-4154

8/15/08 7:44 am
Page 9 of 13

64A-003A

Review Information

Cycle Type:	1 Preliminary Review	Submitted:	07/23/2008	Deemed Complete on 07/23/2008
Reviewing Discipline:	Plan-Long Range Planning	Cycle Distributed:	07/25/2008	
Reviewer:	Monroe, Dan	Assigned:	07/25/2008	
	(619) 236-5529	Started:	08/06/2008	
Hours of Review:	3.00	Review Due:	08/06/2008	
Next Review Method:	Preliminary Review	Completed:	08/07/2008	COMPLETED LATE
		Closed:	08/15/2008	

The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues
Your project still has 6 outstanding review issues with Plan-Long Range Planning (all of which are new).
Last month Plan-Long Range Planning performed 48 reviews, 66.7% were on-time, and 41.9% were on projects at less than < 3 complete submittals

LRP Prelim Review 08.06.08

Cleared?	Issue Num	Issue Text
☐	1	The project site is designated Light Industry by the Navajo Community Plan. Retail uses in these areas are limited to those that are accessory to manufacturing, warehousing or distribution of products on the same premises. Please see LDR-Planning comments related to Use. Stand alone retail buildings would not be consistent with the intent of the Light Industry land use designation in the community plan. (New Issue)
☐	2	The project site is located in CPIOZ Type A. Properties within this area are required to comply with the supplemental regulations provided in the Navajo Community Plan (pages 42-46). These supplemental regulations address: Floor Area Ratio, Building Setback Adjacent to River, Offsetting Planes and Façade Variations, Building Reflectivity, Equipment Enclosure, Outdoor Storage and Display, Refuse Collection Area, Load Areas, Parking Requirements, Curb Cuts and Driveways, Pedestrian Access, Signs and Landscaping. (New Issue)
☐	3	In addition to the regulations above, new development will be required to comply with the Design Guidelines provided in the community plan (pages 47-48). Of particular importance in the regulations and design guidelines related to this proposal are curb cuts along Mission Gorge Road. The community plan recommends the use of common, joint use driveways and/or consolidation of lots in order to minimize the number of curb cuts along Mission Gorge Road. The creation of one joint use driveway should be considered to access new development and existing development. (New Issue)
☐	4	The Circulation Element of the community plan recommends that a study of the realignment of Alvarado Canyon Road be completed and the project be undertaken as soon as feasible. Subject to environmental review, the intersection of Alvarado Canyon Road with Mission Gorge Road should be moved northward to align with the Mission Gorge Road/Fairmount Avenue intersection to help alleviate traffic congestion on the westbound I-8 offramp/Fairmount Avenue intersection. (New Issue)
☐	5	The first phase of this study is underway and is being managed by the Engineering and Capital Improvements Department. The first phase is expected to take approximately 7 months with alternatives expected to be identified by the end of this calendar year. This proposal would prohibit the goal of the community plan to realign Alvarado Canyon Road and connect at the intersection of Mission Gorge Road and Fairmount Avenue. (New Issue)
☐	6	Additionally, the Grantville Master Plan effort for Subarea A of the Grantville Redevelopment Project Area is underway and circulation improvements are a key component of this effort. Reconfigurations of roadways within Subarea A will be analyzed as part of this process. Any development proposals for this area should be closely coordinated with EC&P and City Planning staff managing the Grantville Master Plan so that viable alignment alternatives are not precluded to help alleviate traffic in and around the area. (New Issue)

For questions regarding the 'Plan-Long Range Planning' review, please call Dan Monroe at (619) 236-5529. Project Nbr: 161625 / Cycle: 1

p2k v 02.01.61

Linda French 446-5235

Exhibit viewed

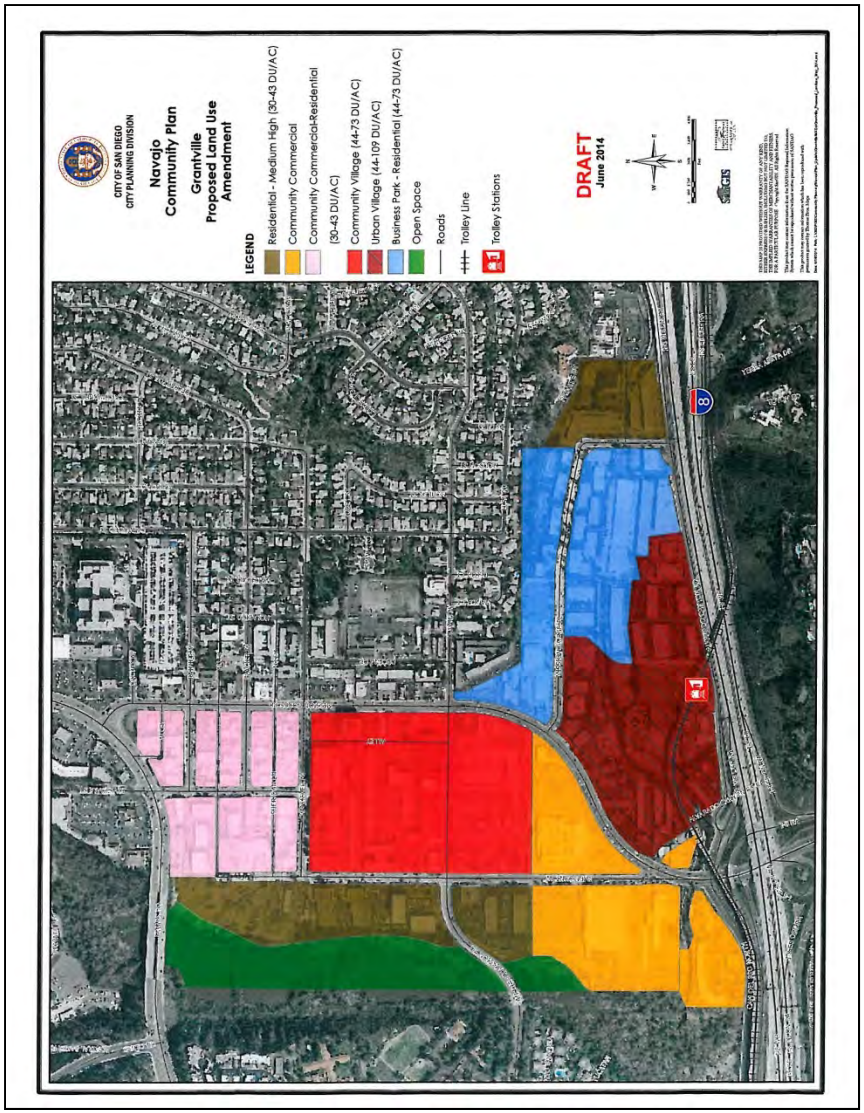


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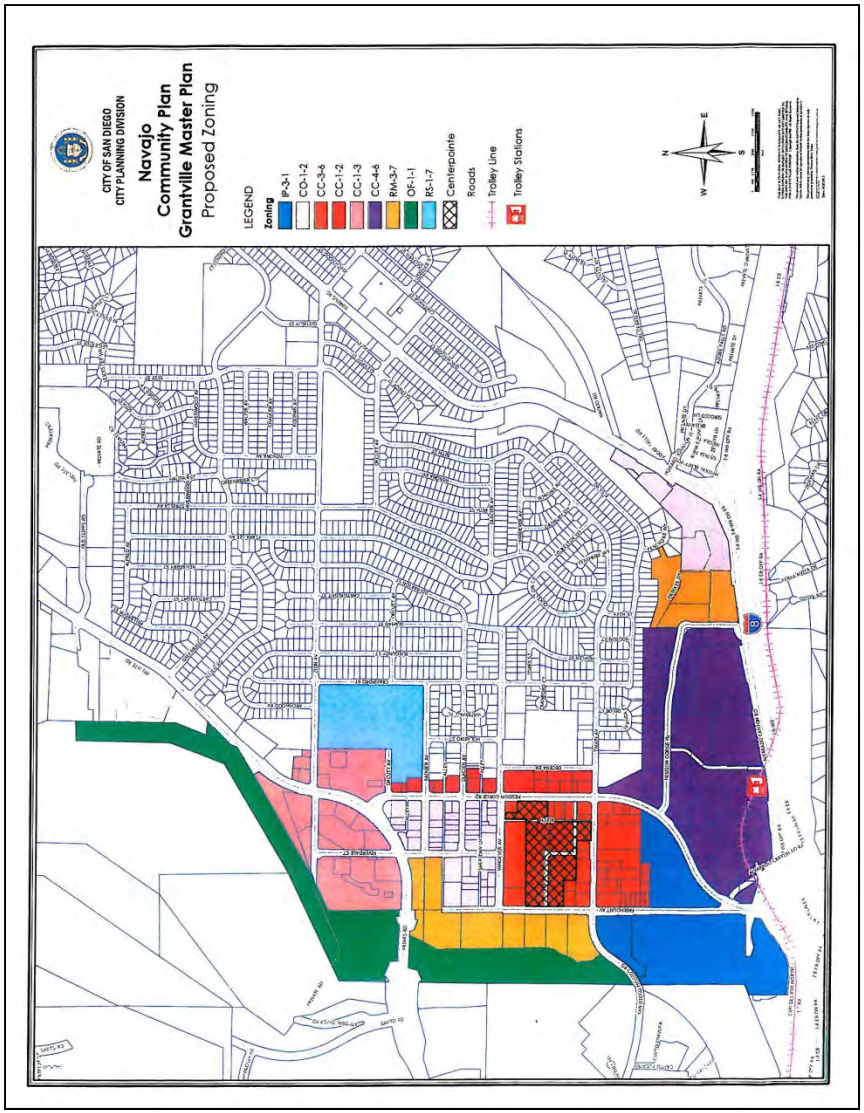


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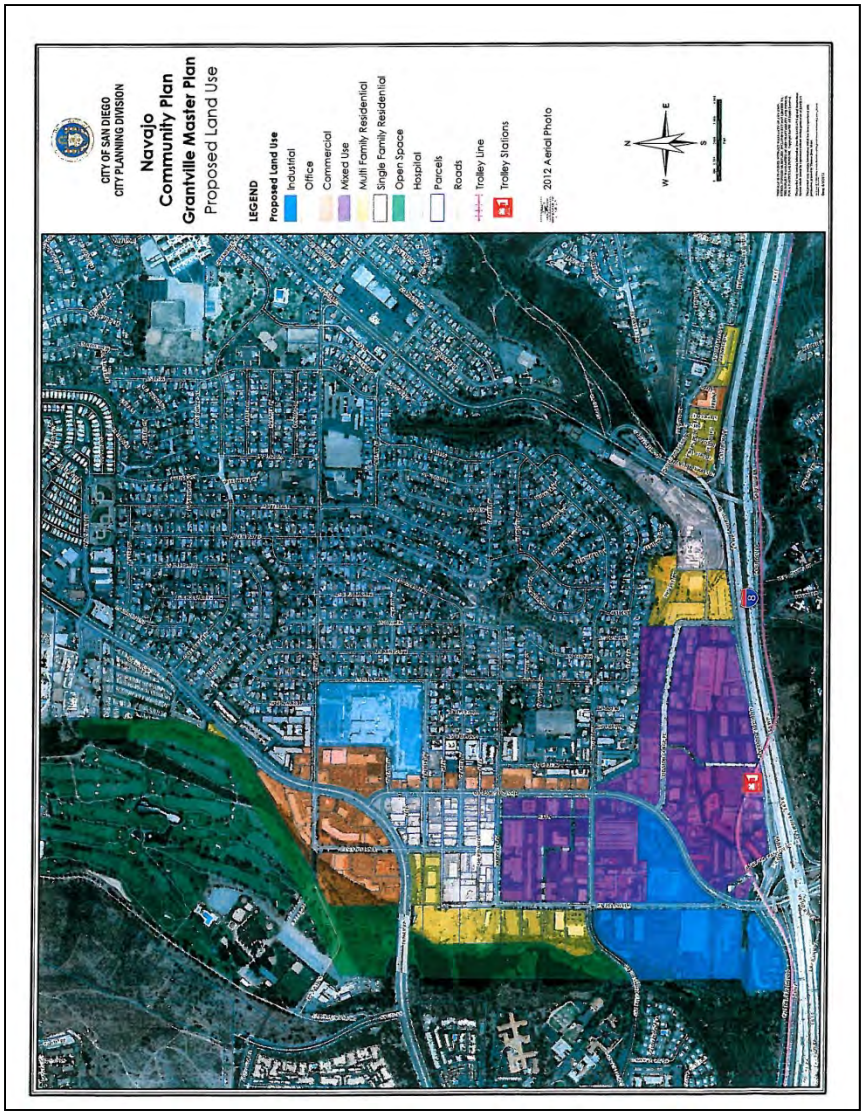
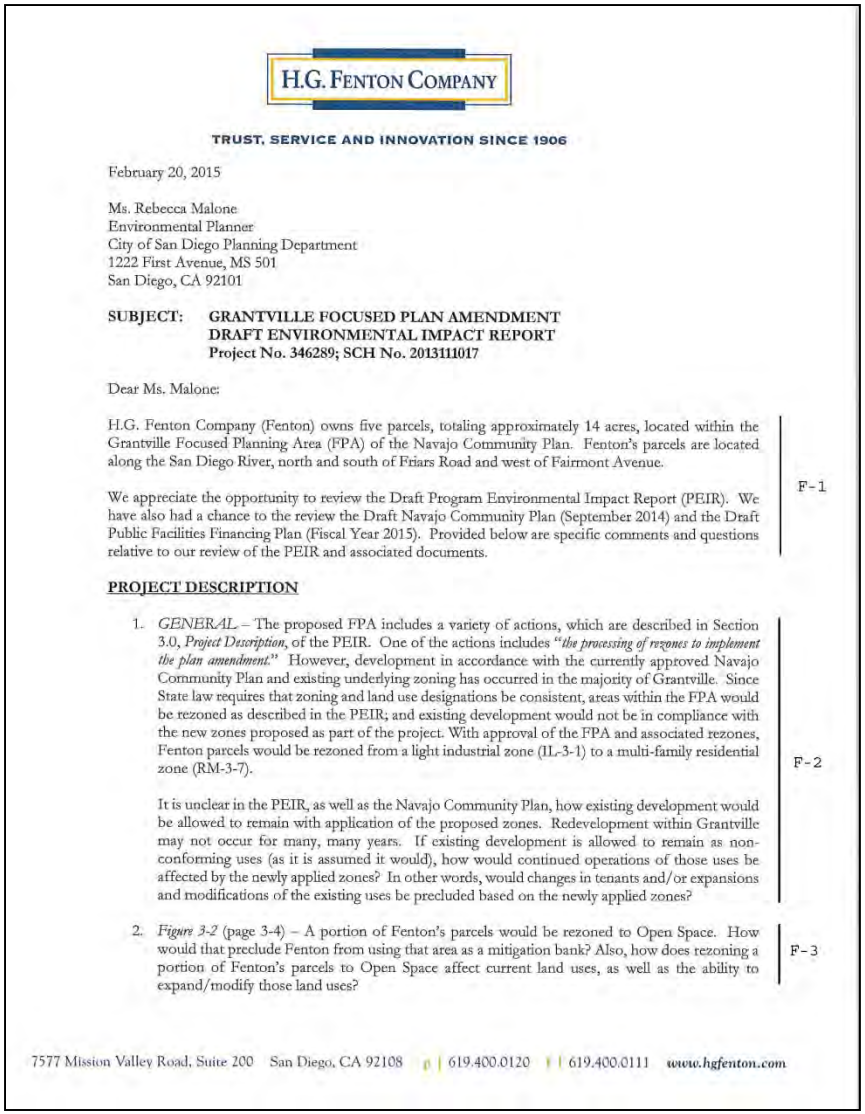


Exhibit viewed



H.G. FENTON COMPANY

TRUST, SERVICE AND INNOVATION SINCE 1906

February 20, 2015

Ms. Rebecca Malone
Environmental Planner
City of San Diego Planning Department
1222 First Avenue, MS 501
San Diego, CA 92101

SUBJECT: GRANTVILLE FOCUSED PLAN AMENDMENT
DRAFT ENVIRONMENTAL IMPACT REPORT
Project No. 346289; SCH No. 2013111017

Dear Ms. Malone:

H.G. Fenton Company (Fenton) owns five parcels, totaling approximately 14 acres, located within the Grantville Focused Planning Area (FPA) of the Navajo Community Plan. Fenton's parcels are located along the San Diego River, north and south of Friars Road and west of Fairmont Avenue.

We appreciate the opportunity to review the Draft Program Environmental Impact Report (PEIR). We have also had a chance to the review the Draft Navajo Community Plan (September 2014) and the Draft Public Facilities Financing Plan (Fiscal Year 2015). Provided below are specific comments and questions relative to our review of the PEIR and associated documents. F-1

PROJECT DESCRIPTION

1. *GENERAL* – The proposed FPA includes a variety of actions, which are described in Section 3.0, *Project Description*, of the PEIR. One of the actions includes "*the processing of rezones to implement the plan amendment.*" However, development in accordance with the currently approved Navajo Community Plan and existing underlying zoning has occurred in the majority of Grantville. Since State law requires that zoning and land use designations be consistent, areas within the FPA would be rezoned as described in the PEIR; and existing development would not be in compliance with the new zones proposed as part of the project. With approval of the FPA and associated rezones, Fenton parcels would be rezoned from a light industrial zone (IL-3-1) to a multi-family residential zone (RM-3-7). F-2

   It is unclear in the PEIR, as well as the Navajo Community Plan, how existing development would be allowed to remain with application of the proposed zones. Redevelopment within Grantville may not occur for many, many years. If existing development is allowed to remain as non-conforming uses (as it is assumed it would), how would continued operations of those uses be affected by the newly applied zones? In other words, would changes in tenants and/or expansions and modifications of the existing uses be precluded based on the newly applied zones?

2. *Figure 3-2* (page 3-4) – A portion of Fenton's parcels would be rezoned to Open Space. How would that preclude Fenton from using that area as a mitigation bank? Also, how does rezoning a portion of Fenton's parcels to Open Space affect current land uses, as well as the ability to expand/modify those land uses? F-3

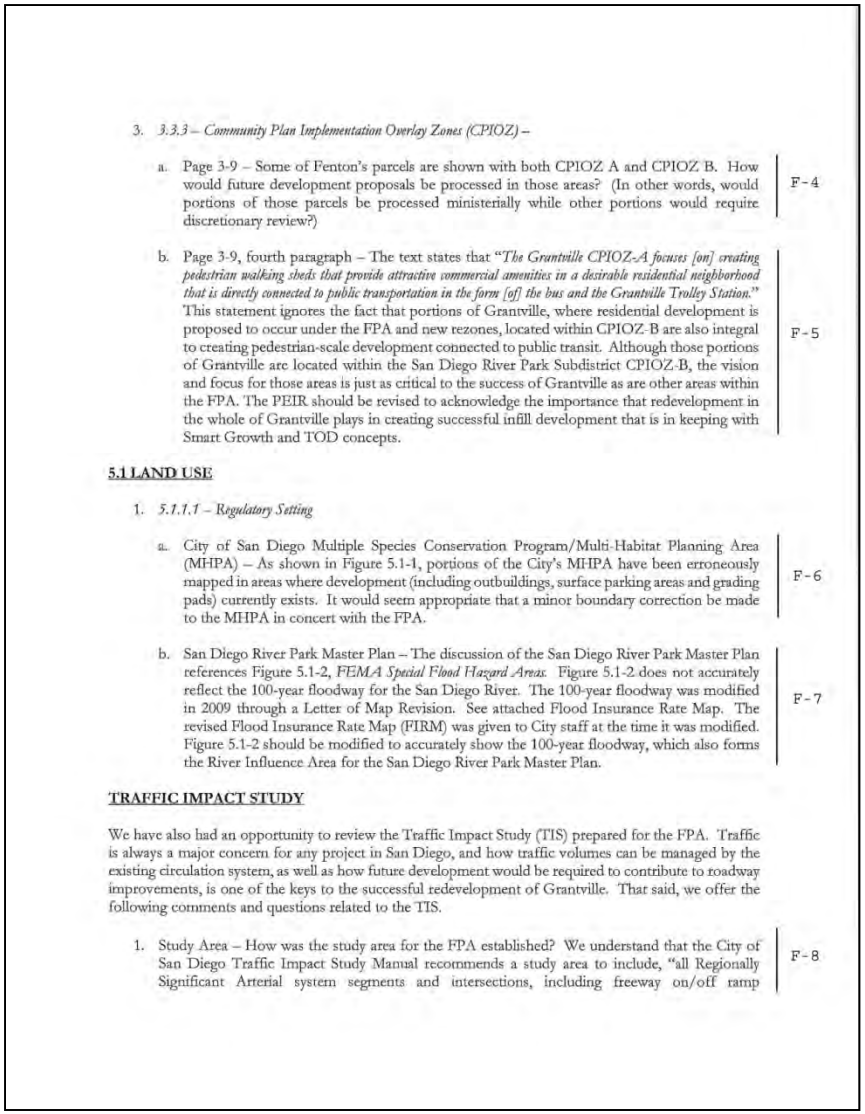
7577 Mission Valley Road, Suite 200 San Diego, CA 92108 p | 619.400.0120 f | 619.400.0111 www.hgfenton.com

Letter F
H.G. Fenton Company

F-1: Comment noted

F-2: The comment does not address the EIR. Previously conforming uses are not considered an environmental impact under CEQA.

F-3: The determination of open space as a mitigation bank is open to speculation because there is no formal development proposal. The proposed land use plan actually increases the Residential designation when compared to the existing land use plan in the Navajo Community Plan. Currently, the San Diego River Park Master Plan provides policies and guidance regarding any development within 200 feet of the River. Any expansion or modifications of previously conforming uses should refer to Chapter 12, Article 7 of the Land Development Code.



3. *3.3.3 – Community Plan Implementation Overlay Zones (CPIOZ) –*

a. Page 3-9 – Some of Fenton's parcels are shown with both CPIOZ A and CPIOZ B. How would future development proposals be processed in those areas? (In other words, would portions of those parcels be processed ministerially while other portions would require discretionary review?) F-4

b. Page 3-9, fourth paragraph – The text states that "*The Grantville CPIOZ-A focuses [on] creating pedestrian walking sheds that provide attractive commercial amenities in a desirable residential neighborhood that is directly connected to public transportation in the form [of] the bus and the Grantville Trolley Station.*" This statement ignores the fact that portions of Grantville, where residential development is proposed to occur under the FPA and new rezones, located within CPIOZ-B are also integral to creating pedestrian-scale development connected to public transit. Although those portions of Grantville are located within the San Diego River Park Subdistrict CPIOZ-B, the vision and focus for those areas is just as critical to the success of Grantville as are other areas within the FPA. The PEIR should be revised to acknowledge the importance that redevelopment in the whole of Grantville plays in creating successful infill development that is in keeping with Smart Growth and TOD concepts. F-5

5.1 LAND USE

1. *5.1.1.1 – Regulatory Setting*

a. City of San Diego Multiple Species Conservation Program/Multi-Habitat Planning Area (MHPA) – As shown in Figure 5.1-1, portions of the City's MHPA have been erroneously mapped in areas where development (including outbuildings, surface parking areas and grading pads) currently exists. It would seem appropriate that a minor boundary correction be made to the MHPA in concert with the FPA. F-6

b. San Diego River Park Master Plan – The discussion of the San Diego River Park Master Plan references Figure 5.1-2, *FEMA Special Flood Hazard Areas.* Figure 5.1-2 does not accurately reflect the 100-year floodway for the San Diego River. The 100-year floodway was modified in 2009 through a Letter of Map Revision. See attached Flood Insurance Rate Map. The revised Flood Insurance Rate Map (FIRM) was given to City staff at the time it was modified. Figure 5.1-2 should be modified to accurately show the 100-year floodway, which also forms the River Influence Area for the San Diego River Park Master Plan. F-7

TRAFFIC IMPACT STUDY

We have also had an opportunity to review the Traffic Impact Study (TIS) prepared for the FPA. Traffic is always a major concern for any project in San Diego, and how traffic volumes can be managed by the existing circulation system, as well as how future development would be required to contribute to roadway improvements, is one of the keys to the successful redevelopment of Grantville. That said, we offer the following comments and questions related to the TIS.

1. Study Area – How was the study area for the FPA established? We understand that the City of San Diego Traffic Impact Study Manual recommends a study area to include, "all Regionally Significant Arterial system segments and intersections, including freeway on/off ramp F-8

F-4: A parcel or parcels that are shown partially in CPIOZ A and CPIOZ B would need to be process through a discretionary process. Please note: the physical boundaries of the CPIOZ A and CPIOZ B areas are not changing from boundaries as identified by ordinance. Any parcel identified in CPIOZ B would require discretionary review as a result of adjacency to the San Diego River Park Master Plan and/or environmentally sensitive habitats.

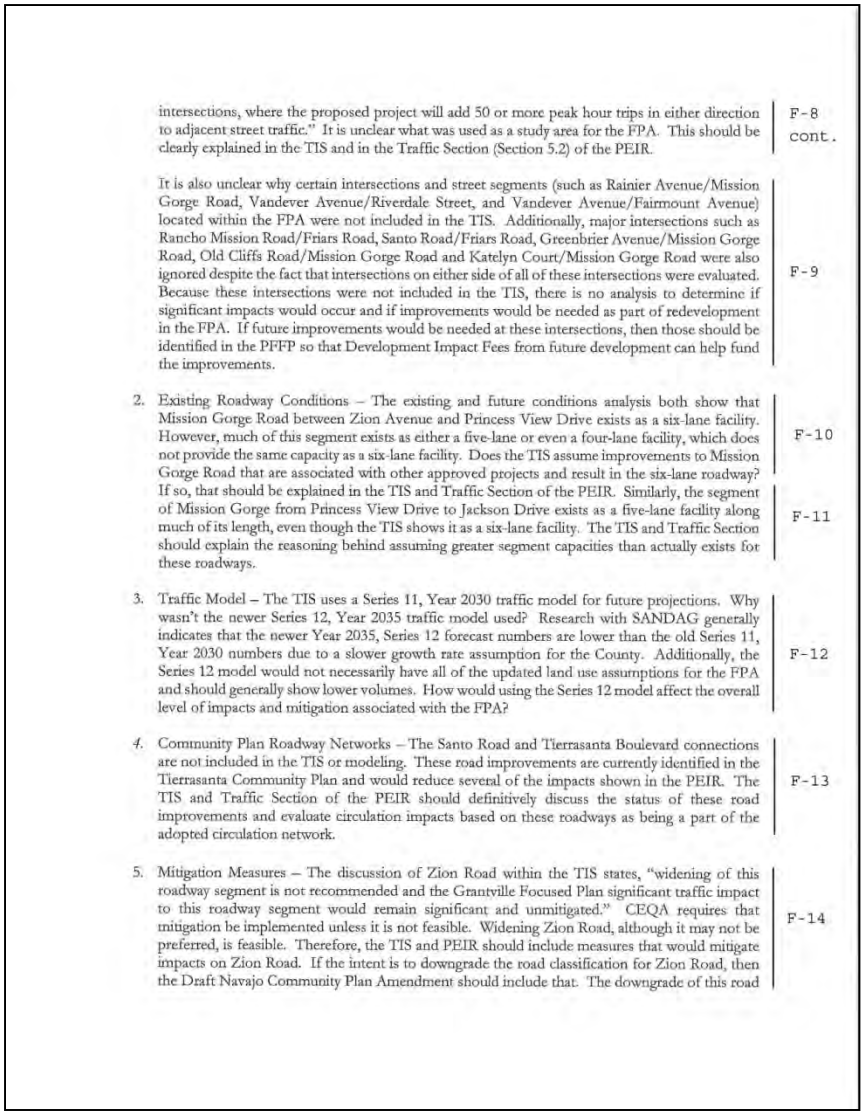
F-5: The San Diego River Park Subdistrict CPIOZ-B section of the currently adopted Navajo Community Plan identifies the importance of pedestrian and bicycle connectivity.

F-6: The City of San Diego's MHPA Plan was adopted in 1997. The map reflects the City's data. A boundary can be adjusted to allow for a project. See: http://www.sandiego.gov/planning/programs/mscp/faq/index.shtml#big

F-7: The mapping has been updated to reflect the submitted information.

F-8: The City of San Diego TIS Manual addresses project level study areas. Programmatic level projects study areas are established using several factors including:

- Existing circulation element roadways intersecting with other existing circulation element roadways where both roadways function or are classified as a collector or higher
- Intersections that provide access to/from freeways
- Anticipated circulation element roadways intersecting with other existing and/or anticipated circulation element roadway where both roadways function or are classified as a collector or higher
- Key intersections where both intersecting streets meet one of the following conditions:
- 4-lanes (or greater)
- 3-lanes and carries over 15,000 ADT
- 2-lanes and carries over 10,000 ADT



intersections, where the proposed project will add 50 or more peak hour trips in either direction to adjacent street traffic." It is unclear what was used as a study area for the FPA. This should be clearly explained in the TIS and in the Traffic Section (Section 5.2) of the PEIR. F-8 cont.

It is also unclear why certain intersections and street segments (such as Rainier Avenue/Mission Gorge Road, Vandever Avenue/Riverdale Street, and Vandever Avenue/Fairmount Avenue) located within the FPA were not included in the TIS. Additionally, major intersections such as Rancho Mission Road/Friars Road, Santo Road/Friars Road, Greenbrier Avenue/Mission Gorge Road, Old Cliffs Road/Mission Gorge Road and Katelyn Court/Mission Gorge Road were also ignored despite the fact that intersections on either side of all of these intersections were evaluated. Because these intersections were not included in the TIS, there is no analysis to determine if significant impacts would occur and if improvements would be needed as part of redevelopment in the FPA. If future improvements would be needed at these intersections, then those should be identified in the PFFP so that Development Impact Fees from future development can help fund the improvements. F-9

2. Existing Roadway Conditions – The existing and future conditions analysis both show that Mission Gorge Road between Zion Avenue and Princess View Drive exists as a six-lane facility. However, much of this segment exists as either a five-lane or even a four-lane facility, which does not provide the same capacity as a six-lane facility. Does the TIS assume improvements to Mission Gorge Road that are associated with other approved projects and result in the six-lane roadway? If so, that should be explained in the TIS and Traffic Section of the PEIR. Similarly, the segment of Mission Gorge from Princess View Drive to Jackson Drive exists as a five-lane facility along much of its length, even though the TIS shows it as a six-lane facility. The TIS and Traffic Section should explain the reasoning behind assuming greater segment capacities than actually exists for these roadways. F-10 F-11

3. Traffic Model – The TIS uses a Series 11, Year 2030 traffic model for future projections. Why wasn't the newer Series 12, Year 2035 traffic model used? Research with SANDAG generally indicates that the newer Year 2035, Series 12 forecast numbers are lower than the old Series 11, Year 2030 numbers due to a slower growth rate assumption for the County. Additionally, the Series 12 model would not necessarily have all of the updated land use assumptions for the FPA and should generally show lower volumes. How would using the Series 12 model affect the overall level of impacts and mitigation associated with the FPA? F-12

4. Community Plan Roadway Networks – The Santo Road and Tierrasanta Boulevard connections are not included in the TIS or modeling. These road improvements are currently identified in the Tierrasanta Community Plan and would reduce several of the impacts shown in the PEIR. The TIS and Traffic Section of the PEIR should definitively discuss the status of these road improvements and evaluate circulation impacts based on these roadways as being a part of the adopted circulation network. F-13

5. Mitigation Measures – The discussion of Zion Road within the TIS states, "widening of this roadway segment is not recommended and the Grantville Focused Plan significant traffic impact to this roadway segment would remain significant and unmitigated." CEQA requires that mitigation be implemented unless it is not feasible. Widening Zion Road, although it may not be preferred, is feasible. Therefore, the TIS and PEIR should include measures that would mitigate impacts on Zion Road. If the intent is to downgrade the road classification for Zion Road, then the Draft Navajo Community Plan Amendment should include that. The downgrade of this road F-14

F-9: These particular intersections are based on criteria identified in F-8 and as a result, they were excluded.

F-10: The focus of this programmatic level document is the Grantville area. The Grantville FPA did not take into consideration the entire Navajo circulation system. Additionally, the majority of Mission Gorge Road between Zion Avenue and Princess View Drive functions as either a 6 lane or a 5 lane facility. Assessing future volumes along this segment, the LOS was determined to be at a LOS D even if a five lane roadway capacity was considered.

F-11: This roadway segment is located in Sub-area A outside the Grantville FPA. Future widening of this roadway segment will be addressed at the project level with the development of the Shawnee Master Plan and adjacent 395 acre site.

F-12: Series 11 was the current series at the time when this project was initiated and future forecast had not been developed for the study area. As future development occurs, any future analysis would use the latest modeling in determining impact.

F-13: This programmatic level document focused on the Grantville area and reasonable expected roadway improvements as they relate to the focused study area.

F-14: The focus of this programmatic level document is the Grantville area and not the entire Navajo circulation system. This roadway segment is outside the Grantville area. However, widening or restriping this 2-lane collector roadway to a four Lane Major Street would impact surrounding residential properties, community character, bicycle facilities or on-street parking that is heavily utilized in this area. Nevertheless, an improvement project has been included in the PFFP to improve traffic

segment should not be left to future studies and development as this has the potential to piecemeal the analysis of impacts or unfairly burden future development. F-14 cont.

6. Transportation and Mobility Planning – As planning areas in San Diego go through updates, innovative and contemporary transportation and mobility solutions should be promoted – ones that provide for complete streets that accommodate more than just the automobile and reflect modern transportation planning. Now is the time to consider alternative – and creative – methods for handling traffic and accommodating a variety of mobility options in Grantville. Planning, designing, and updating communities in San Diego should reflect modern techniques that will sustain our communities. In this regard, we question why the FPA does include any innovative transportation solutions. Instead, it seems to rely on improvements that reflect transportation planning of a by-gone era.

   Early in the process, there was discussion of a one-way couplet on Fairmount Avenue/Mission Gorge Road. However, there is no reference to this improvement in the TIS or PEIR. A one-way couplet has the potential to avoid significant and costly road widening and should be evaluated as an alternate way to mitigate traffic. A one-way couplet could also provide superior performance while maintaining parking for businesses and accommodation for bikes. A one-way couplet could result in an overall narrower roadway, which will provide a superior pedestrian environment with shorter crossing distances and improved safety. F-15

   Intelligent Transportation Systems (ITS) solutions such as Adaptive Traffic Control which have been implemented in other areas of San Diego should be explored as feasible and alternative mitigation. A reference to ITS in the mitigation section is made but no evaluation of the effectiveness of these solutions is provided. These solutions could prove less costly and more feasible than other identified mitigation measures and should be explored fully.

As a property owner in Grantville, Fenton is looking forward to the redevelopment opportunities envisioned by the FPA for Grantville. Please ensure that we receive a copy of the Final PEIR and notification of all upcoming hearings.

Sincerely,

John LaRaia
H.G. Fenton Company

F-15: TIS requires the implementation of Transportation Demand Management principals and deployment of Intelligent Transportation Systems (ITS). ITS includes but is not limited to the implementation of Adaptive Traffic Control and Traffic signal Priority systems.

One-way couplets conflict with the character of the Grantville area. The implementation of a couplet is recommended in a system with closely spaced intersections which is not the case for the Grantville area.

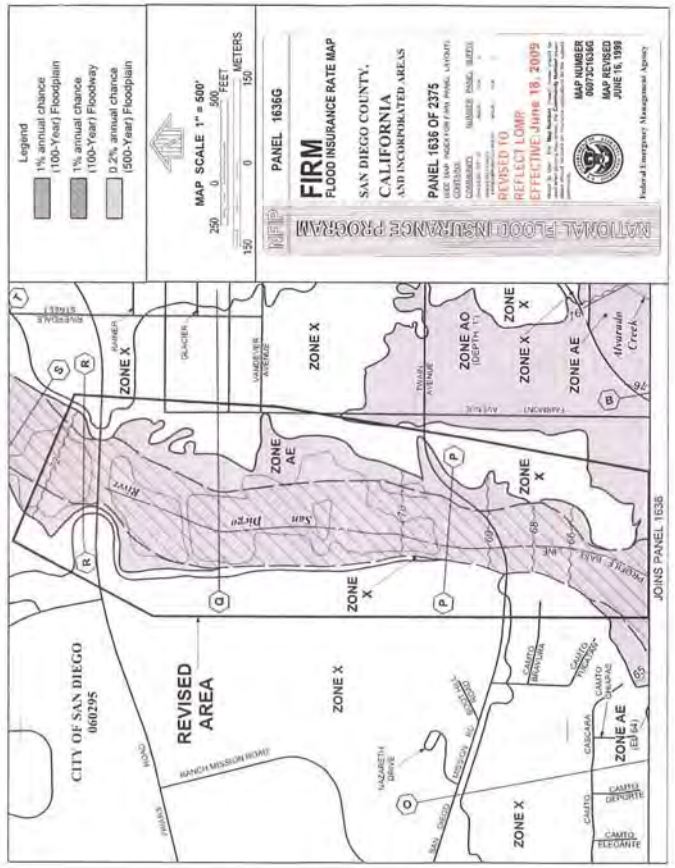
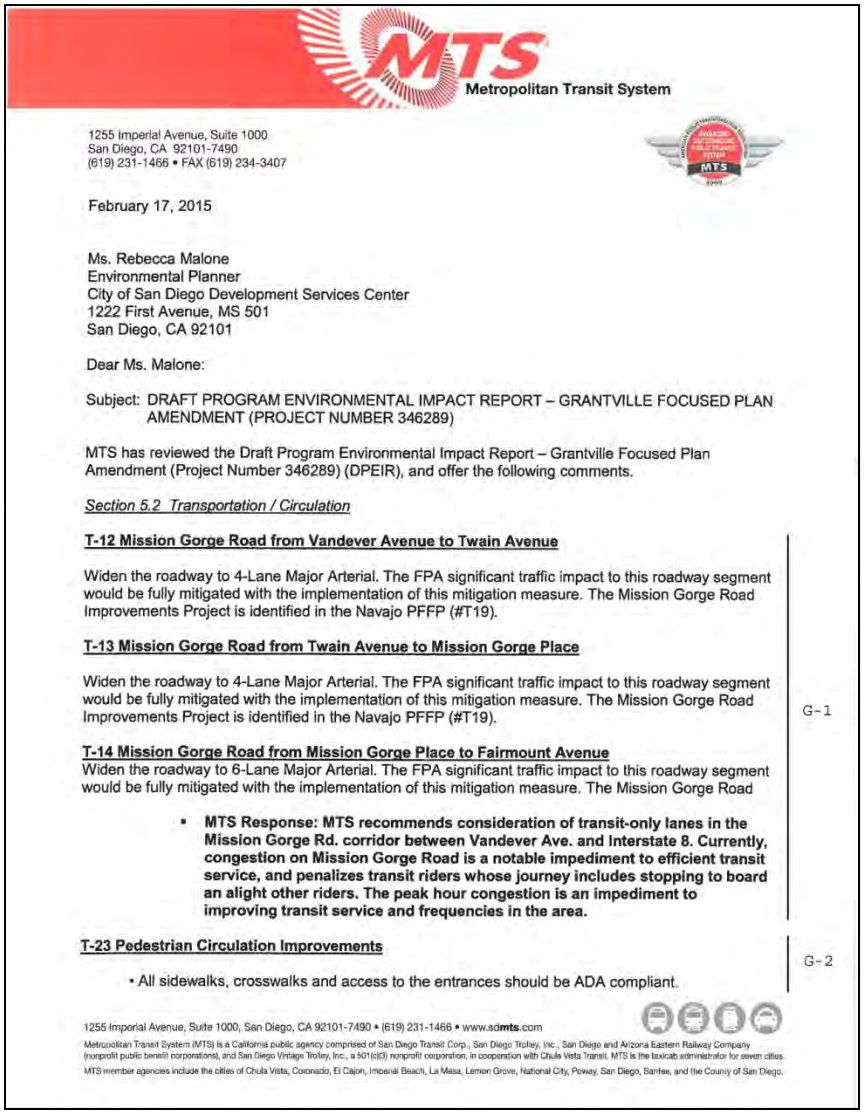


Exhibit Viewed – See F-7



Metropolitan Transit System

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

February 17, 2015

Ms. Rebecca Malone
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Malone:

Subject: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT – GRANTVILLE FOCUSED PLAN AMENDMENT (PROJECT NUMBER 346289)

MTS has reviewed the Draft Program Environmental Impact Report – Grantville Focused Plan Amendment (Project Number 346289) (DPEIR), and offer the following comments.

Section 5.2 Transportation / Circulation

T-12 Mission Gorge Road from Vandever Avenue to Twain Avenue

Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).

T-13 Mission Gorge Road from Twain Avenue to Mission Gorge Place

Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).

G-1

T-14 Mission Gorge Road from Mission Gorge Place to Fairmount Avenue

Widen the roadway to 6-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road

- **MTS Response: MTS recommends consideration of transit-only lanes in the Mission Gorge Rd. corridor between Vandever Ave. and Interstate 8. Currently, congestion on Mission Gorge Road is a notable impediment to efficient transit service, and penalizes transit riders whose journey includes stopping to board an alight other riders. The peak hour congestion is an impediment to improving transit service and frequencies in the area.**

T-23 Pedestrian Circulation Improvements

G-2

- All sidewalks, crosswalks and access to the entrances should be ADA compliant.

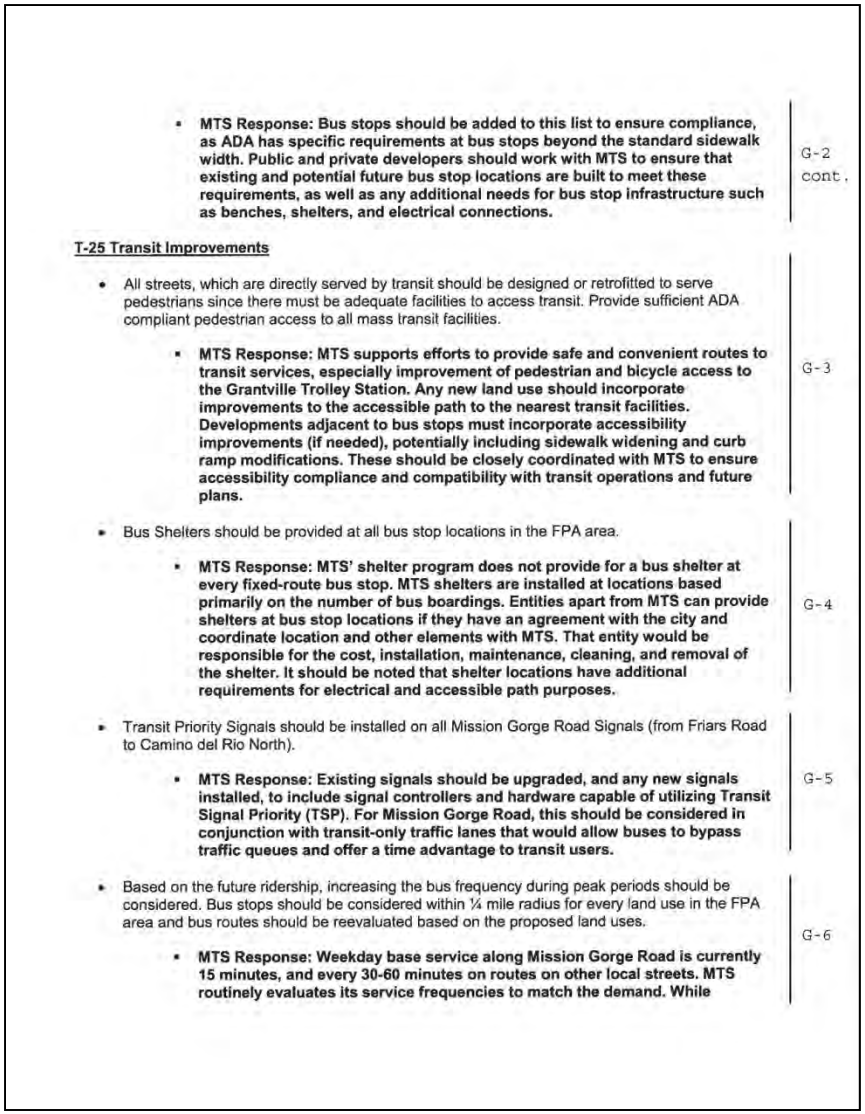
1255 Imperial Avenue, Suite 1000, San Diego, CA 92101-7490 • (619) 231-1466 • www.sdmts.com

Metropolitan Transit System (MTS) is a California public agency comprised of San Diego Transit Corp., San Diego Trolley, Inc., San Diego and Arizona Eastern Railway Company (nonprofit public benefit corporations), and San Diego Vintage Trolley, Inc., a 501(c)(3) nonprofit corporation, in cooperation with Chula Vista Transit. MTS is the taxicab administrator for seven cities. MTS member agencies include the cities of Chula Vista, Coronado, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, Poway, San Diego, Santee, and the County of San Diego.

Letter G
Metropolitan Transit System

G-1: The proposed improvements along Mission Gorge Road and Fairmount Avenue and specifically the Fairmount Avenue and I-8 interchange will improve the overall operation along the entire corridor. Additionally, the deployment and use of ITS technology would also improve the traffic flow along the corridor including but not limited to the implementation of adaptive traffic control system and transit signal priority. The assessment and implementation of these measures at the project level will improve the overall transit service in the Grantville area.

G-2: T-23 has been amended and to include mitigation under the City's discretion. Any bus stops created by public or private developers should work with MTS to ensure compliance with the ADA and other applicable laws.



- **MTS Response: Bus stops should be added to this list to ensure compliance, as ADA has specific requirements at bus stops beyond the standard sidewalk width. Public and private developers should work with MTS to ensure that existing and potential future bus stop locations are built to meet these requirements, as well as any additional needs for bus stop infrastructure such as benches, shelters, and electrical connections.**

G-2 cont.

T-25 Transit Improvements

- All streets, which are directly served by transit should be designed or retrofitted to serve pedestrians since there must be adequate facilities to access transit. Provide sufficient ADA compliant pedestrian access to all mass transit facilities.
  - **MTS Response: MTS supports efforts to provide safe and convenient routes to transit services, especially improvement of pedestrian and bicycle access to the Grantville Trolley Station. Any new land use should incorporate improvements to the accessible path to the nearest transit facilities. Developments adjacent to bus stops must incorporate accessibility improvements (if needed), potentially including sidewalk widening and curb ramp modifications. These should be closely coordinated with MTS to ensure accessibility compliance and compatibility with transit operations and future plans.**

G-3

- Bus Shelters should be provided at all bus stop locations in the FPA area.
  - **MTS Response: MTS' shelter program does not provide for a bus shelter at every fixed-route bus stop. MTS shelters are installed at locations based primarily on the number of bus boardings. Entities apart from MTS can provide shelters 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, and removal of the shelter. It should be noted that shelter locations have additional requirements for electrical and accessible path purposes.**

G-4

- Transit Priority Signals should be installed on all Mission Gorge Road Signals (from Friars Road to Camino del Rio North).
  - **MTS Response: Existing signals should be upgraded, and any new signals installed, to include signal controllers and hardware capable of utilizing Transit Signal Priority (TSP). For Mission Gorge Road, this should be considered in conjunction with transit-only traffic lanes that would allow buses to bypass traffic queues and offer a time advantage to transit users.**

G-5

- Based on the future ridership, increasing the bus frequency during peak periods should be considered. Bus stops should be considered within ¼ mile radius for every land use in the FPA area and bus routes should be reevaluated based on the proposed land uses.
  - **MTS Response: Weekday base service along Mission Gorge Road is currently 15 minutes, and every 30-60 minutes on routes on other local streets. MTS routinely evaluates its service frequencies to match the demand. While**

G-6

G-3: T-25 has been amended and to include mitigation under the City's discretion. The measure no longer discusses transit improvements that would be under MTS authority.

G-4: T-25 has been amended and to include mitigation under the City's discretion. The measure no longer discusses transit improvements that would be under MTS authority.

G-5: T-25 has been amended and to include mitigation under the City's discretion. The measure no longer discusses transit improvements that would be under MTS authority.

G-6: T-25 has been amended and to include mitigation under the City's discretion. The measure no longer discusses transit improvements that would be under MTS authority.

demand in this area doesn't currently warrant added frequencies, this would be adjusted when and as the demand changes. However, congestion on Mission Gorge Road is currently an impediment to increased service frequency. MTS suggests consideration of transit-only traffic lanes, along with TSP, on Mission Gorge Road in the plan area in order to accommodate existing and additional bus frequencies.

G-6 cont.

MTS bus stops are located along existing bus routes as required to be 1) near major trip generators, 2) at safe crossing points with accessible paths, and 3) spaced as warranted by ridership. In some cases it may not be practical or feasible to locate a stop within a ¼ mile of every location, especially if a site is more than a quarter of a mile from a bus route; in other cases, a location may have more than one stop within a ¼ of a mile.

These should also be considered comments for the Transportation Impact Study for the Grantville Focused Plan Amendment EIR (July 18, 2014), which is included as an appendix and features virtually the exact same wording on many elements.

G-7

Section 5.7 Hydrology

The DPEIR contains hydrology studies that compare existing conditions with proposed increases in certain sub-basin runoff. However, the document doesn't discuss potential solutions to the flooding problems along properties north of Alvarado Creek, a tributary to the San Diego River. The DPEIR states that as individual projects come forward for approval, they would be required to consider and mitigate for any potential development within the 100-year flood plain.

G-8

The City of San Diego's Municipal Code and other state and federal regulations dictate how and if development can occur within a flood plain. Not considering workable solutions to the flooding issue surrounding Alvarado Creek may not allow full development as outlined in the Grantville Focused Plan Amendment.

For Transportation / Circulation comment discussions, please contact Denis Desmond, Manager of Transit Planning, at 619.557.1929 Thank you for your consideration.

Sincerely,

Tim Allison
Manager of Real Estate Assets

G-7: Comment Noted.

G-8: The City is applying for grants and other funding opportunities to address the existing flood conditions. The environmental impacts of those actions will be analyzed once the scope of the flood control projects is determined. Since the proposed FPA does not include any actions to address flooding, a discussion of the impacts of flood control projects is speculative.

February 12, 2015

Rebecca Malone
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Navajo Community Planning Group comments to the Grantville Focused Plan Amendment, Project No. 346289

Dear Ms. Malone,

The Navajo Community Planning Group (NCPI) has reviewed the Grantville Focused Plan Amendment Environmental Impact Report and offer the following comments and recommendations.

Bike Lanes 5.2.1.4 (Transportation/Circulation)
"Strive to separate automobile, pedestrian and bicycle conflicts and, where safe and practical, provide specially designated bikeways to accommodate the increased demand for this mode of travel."

NCPI supports installation of bike lanes on secondary streets and the proposed San Diego River bike path but not along major thoroughfares until after road improvements because existing streets endure significant traffic at peak times and the addition of bike lines would negatively impact traffic flow and impede the safety of cyclists traversing narrow streets. H-1

Note: The Navajo Community Planning Group will pursue and support *Complete Street Grants* which provide monies which could lead to re-striping the entirety of a street not just provide a bike lane.

Significance of Impact 5.2.2.2 (Transportation/Circulation)
"Per the City's significance thresholds and the analysis methodology, as described in Table 5.2- 10, several intersections and roadway segments have been determined to result in significant cumulative impacts."

NCPI remains concerned with the traffic impacts associated with the Focused Plan Amendment at all major intersections and road segments. The Draft EIR table 5.2-8 identifies 15 intersections that would be classified as significant (LOS E/F) as a consequence of the land use changes. NCPI raises particular concern with the intersection of Fairmont and Alvarado Canyon Road and the Friars Road I-15 North and South bound ramps. NCPI strongly recommends that the Alvarado Canyon Road Alignment be given top priority to mitigate traffic impacts and that the city work with Caltrans and SANDAG to address impacts to I-15 North and Southbound ramps. H-2

Letter H
Navajo Community Planning Group

H-1: Any repurposing of existing roadways to implement bike lanes will be coordinated with community representatives.

H-2: The Navajo community representatives will have the opportunity to provide their input on prioritizing projects included in the Navajo PFFP.

Parks/Recreational Facilities 5.14.1.4

"The Navajo PFFP identifies a number of proposed park and recreation projects needed in the Navajo Community to serve future residents and would be implemented as funding sources are identified. The construction of any new park and recreational facilities that may be required would be subject to environmental review pursuant to CEQA at the time of plan design. Therefore, it is anticipated that impacts to parks and recreation would be less than significant with the implementation of the proposed FPA."

H-3

The EIR acknowledges a park deficit of 23.63 acres at buildout based on current city park formula standard of 2.8 usable acres per 1,000 residents. This will affect existing active parks and the traffic associated with active parks used for soccer and other organized activities as users come and go for games and practices during peak use times. The EIR should clearly identify impacts specific to athletic fields were organized sports typically occur.

Flooding Impacts 5.7-10 (Hydrology)

"The proposed FPA allows for the future development of Industrial, Commercial, and Retail land uses within the 100-year floodplain of San Diego River and Alvarado Creek. For any such development within the mapped floodplain, an applicant would be required to perform hydraulic and hydrologic analysis and submit associated studies and grading/improvement plans to the City of San Diego for review."

The Federal Emergency **Management** Agency's *Flood Insurance Rate Maps* define a 100-year **floodplain** along Alvarado Creek **in** the Grantville Focus Plan **Amendment** Area. The **floodplain** is not contained **within** the existing channel or culverts, **but** spreads broadly beyond these conveyances. As a result, **future development** areas will be **within** the **floodplain** unless **flood control improvements** are implemented. The City of San Diego's *Municipal Code* and federal **regulations generally** discourage or **prohibit development** in a **floodplain**. The EIR contains **hydrologic information, but** does not address **flood** control **improvements** that will allow full **development** as **outlined** in the FPA. **Additional** hydraulic information must **be** included in the EIR addressing the Alvarado Creek **floodplain** and **outlining alternatives** for conveying 100-year flows to **allow implementation** of the FPA.

H-4

Respectfully submitted by the Navajo Community Planning Group.

Matthew Adams
NCPI Chair

Cc: board members
Councilman Scott Sherman

H-3: The Public Facilities section of the draft EIR used outdated information to calculate the impact of the project on park and recreation facilities. The Grantville Focused Plan Amendment includes changes to the Navajo Community Plan and the Navajo Public Facilities Financing Plan that add new park facilities to the community. The final EIR has been amended to state the following:

> At community build out the Navajo Community population will require approximately 204 acres of population-based parks. Through the community update process an additional 72.46 acres of park land was identified for future acquisition and development, resulting in a 7.76 acre surplus in the Navajo Community.

H-4: The proposed project involved an amendment to the Navajo Community Plan, revisions to the zoning code, the community plan implementation overlay zone, and revisions to the Navajo Public Facilities Financing Plan. Specific actions necessary to address the existing flooding condition are not a part of the project and therefore will not be included in the project description. In the Final EIR, the Hydrology and Environmental Setting sections will include language identifying the flooding hazard.

From: Cultural [Cultural@pauma-nsn.gov]
Sent: Monday, January 05, 2015 11:45 AM
To: DSD EAS
Cc: Dixon, Patti; Jeremy Zagarella
Subject: Grantville Focused Plan Amendment. Project Number 246289

The Pauma Band of Luiseno Indians has received the December 19 notice on the Grantville Focused Plan Amendment. Your project lies within the ancestral territory of the Kumeyaay people. We support the City's Mitigation Measures that pertain to Cultural Resources. We do have a question. In the event of a significant find of human remains is discovered, what would the procedures be if the MLD's request that they be re-buried where they were found? Thank you for notifying us of the project and please continue to keep us informed at the project progresses. I-1

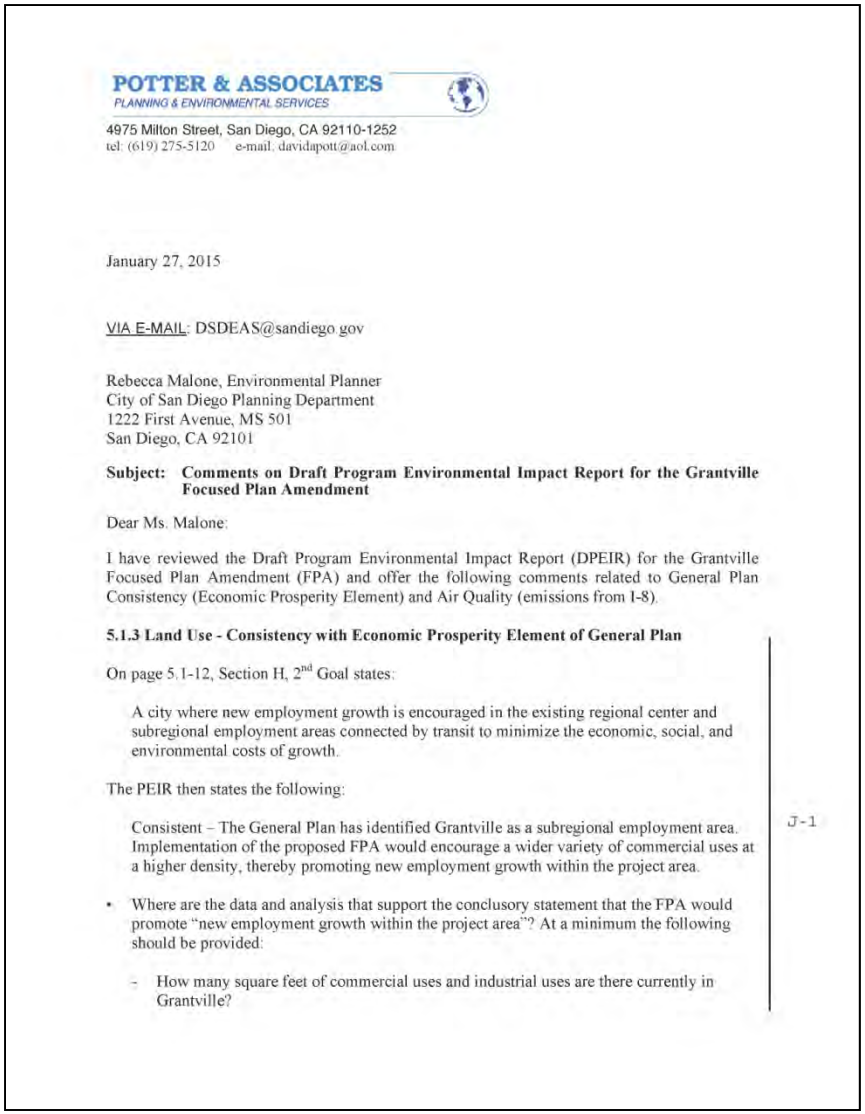
Chris Devers
Cultural Clerk
Pauma Band of Luiseno Indians

1

Letter I
Pauma Band of Luiseno Indians

I-1: The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered during construction-related activities is governed by state (i.e., AB 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) law, as well as the provisions set forth in accordance with the California Public Resources Code (Section 5097.8) and the Health and Safety Code (Section 7050.5) in consultation with the Most Likely Descendant (MLD), as indicated by the Native American Heritage Commission. In addition, the City's Mitigation Framework further defines the steps and procedures which must be followed to evaluate the potential for impacts Native American cultural resources including human remains which must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants.

In the event that human remains are encountered during any phase of an archaeological investigation, including monitoring of construction-related activities, the provisions of the California Public Resources Code and the Health and Safety Code would be invoked and consultation regarding appropriate treatment would commence. This could result in a request by the MLD to repatriate all human remains and associated grave goods to the appropriate tribal entity or the request for reburial on-site. The decision to rebury human remains on-site would be determined between the MLD and property owner and may require protective easements and/or design features to ensure that the reburial site it protected in perpetuity.



POTTER & ASSOCIATES
PLANNING & ENVIRONMENTAL SERVICES
4975 Milton Street, San Diego, CA 92110-1252
tel: (619) 275-5120 e-mail: davidapott@aol.com

January 27, 2015

VIA E-MAIL: DSDEAS@sandiego.gov

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Comments on Draft Program Environmental Impact Report for the Grantville Focused Plan Amendment

Dear Ms. Malone:

I have reviewed the Draft Program Environmental Impact Report (DPEIR) for the Grantville Focused Plan Amendment (FPA) and offer the following comments related to General Plan Consistency (Economic Prosperity Element) and Air Quality (emissions from I-8).

5.1.3 Land Use - Consistency with Economic Prosperity Element of General Plan

On page 5.1-12, Section H, 2nd Goal states:

> A city where new employment growth is encouraged in the existing regional center and subregional employment areas connected by transit to minimize the economic, social, and environmental costs of growth.

The PEIR then states the following:

> Consistent – The General Plan has identified Grantville as a subregional employment area. Implementation of the proposed FPA would encourage a wider variety of commercial uses at a higher density, thereby promoting new employment growth within the project area.

J-1

- Where are the data and analysis that support the conclusory statement that the FPA would promote "new employment growth within the project area"? At a minimum the following should be provided:
  - How many square feet of commercial uses and industrial uses are there currently in Grantville?

Letter J
Potter and Associates

J-1: Although the General Plan identifies Grantville as a Subregional Employment Area, the General Plan also determined that the area is being appropriate for new growth and development. Specifically, Appendix C, EP-3 states the following:

> The Morena and Grantville areas originally developed with industrial uses, but most of the industrial uses have relocated to the northern part of the City because of their inability to compete effectively with commercial uses for land and buildings in these areas and the changing needs of modern industrial businesses for larger more efficient industrial buildings. Despite the fact that these two areas have been historically designated for industrial uses, they have become largely commercialized and no new industrial uses are likely to occur here. In both Morena and Grantville, residential uses are appropriate in targeted locations. The application of more refined community plan land use designations can assist in separating potentially incompatible uses.

As shown on Table 3-3 in the Project Description section of the EIR, the project area currently contains 1,012,600 square feet (sf) of commercial use and 1,393,500 sf of industrial uses. The proposed FPA would allow up to 1,400,900 sf of commercial development and 250,000 sf of industrial development. Without specific development proposals, it is difficult to determine the specific number and types of jobs that will be created in the project area. However, since the General Plan states that no new industrial uses are likely to occur in Grantville, the shift from industrial to commercial jobs would be consistent with the General Plan. Page 5.1-12 Section H 2nd Goal language has been revised to reflect this situation.

- How many square feet of commercial uses and industrial uses will there be in Grantville at buildout?
- How many and what types of jobs are there currently in Grantville?
- How many and what types of jobs will there be in Grantville at buildout?
- What is the existing jobs-to-housing ratio in Grantville?
- What will the jobs-to-housing ratio be in Grantville at buildout?

J-1 cont.

5.3 Air Quality – Health Effects Associated with Emissions from I-8

The PEIR fails to address health effects associated with emissions from I-8 on the future residents of the proposed residential projects to be located on north side of I-8.

According to the "Air Quality and Land Use Handbook: A Community Health Perspective" published in April 2005 by the California Environmental Protection Agency and the California Air Resources Board:

> Air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas. Many of these epidemiological studies have focused on children. A number of studies identify an association between adverse non-cancer health effects and living or attending school near heavily traveled roadways. These studies have reported associations between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases lung function in children. (page 8)

J-2

The Handbook's advisory recommendation is to avoid siting new sensitive land uses (including residences) with 500 feet of a freeway.

The FPA would allow/encourage residences within 500 feet of I-8.

- The PEIR should recommend enforceable measures to minimize the health effects on future residents within 500 feet of I-8. For possible measures, see "Status of Research on Potential Mitigation Concepts to Reduce Exposure to Nearby Traffic Pollution" published on August 23, 2012 by the California Environmental Protection Agency and the California Air Resources Board.

J-2: Building code provides for stringent requirements associated with air intake and ventilation systems. Additionally, FPA includes supplemental design regulations when providing residences near the I-8.

If you have any questions, please contact me at the above phone number or e-mail address.

Thank you for the opportunity to comment.

Sincerely,

David A. Potter, AICP
Principal

CC: Mayor Kevin L. Faulconer (kevinfaulconer@sandiego.gov)
Council President Sherri Lightner, District 1 (sherrilightner@sandiego.gov)
Brian Schoenfisch, Program Manager (bschoenfisch@sandiego.gov)

From: Ralph Richardson [ralphdr40@yahoo.com]
Sent: Monday, February 09, 2015 5:41 PM
To: DSD EAS
Subject: GRANTVILLE FOCUSED PLAN AMENDMENT PROJECT NUMBER (346289)

Thank you for extending the deadline for public review and comment.

Transportation, Traffic and Circulation coupled with various parking issues have always been a top concern within this community. To this end, the City must abate the present and future added traffic concerns and problems through modified circulation or some form of rerouting traffic, street restriping etc. K-1

In my view, the current in and out main entrance at Kaiser was outdated less than 3 years after it's original operation began. The original design didn't take into consideration the future traffic growth this facility would bring along with other nearby commercial establishments among a residential neighborhoods in and around the complex. An update and redesign of this 50 year old major commercial entrance should be considered immediately to improve public safety and provide safer residential streets with excessive traffic generated along Zion Avenue. This unsafe condition will escalate once additional traffic is added to the mix on Zion Avenue and Mission Gorge Road. This overall current problem needs to be reviewed and addressed before growing this region any further. For starters, and before any further near miss accidents and/or death occurs, the City should paint "NO U TURNS" at intersection of Zion Avenue and Archwood Avenue. K-2

Further, stencil or paint the words "SLOW DOWN" or "30 MPH SPEED ZONE" onto the street pavement west bound lane Zion Avenue. This is needed now and in the future when added and excessive traffic increases due to growth. If stenciling or painting is not adequate perhaps adding sped limit solar activated signs along Zion Avenue for added public safety or add SDPD officer to issue citations as needed. Traffic west on Zion Avenue is far too fast for this area downhill toward the hospital main entrance and ER entrance. Strongly urge you check with SDPD Community Liaison Officer Adam McElroy for support.

Restripe and repaint faded lanes and streets markings to help public safety during both evening and daylight hours for the traveling public. The present along with any added traffic levels will affect the wear and tear on the striping and requires more attention and upkeep. K-3

Improve intersection sight distance for public safety and traffic conditions via a monitoring program or during planning stages of where shrubs are planted in setback areas impeding drivers sight distance etc. K-4

More emphasis, direction and education toward promoting future use of transit system and public transportation is a must. Consider more park and ride parking lots within the planned area with shuttle rides to nearby trolley stations encouraging people to ride the trolley and mass transit. Arrange and encourage more active carpools through major companies and corporations. Incentives could be offered by major players. Thus perhaps providing and leaving more parking voids on public streets. K-5

1

Letter K
Ralph Richardson (1of 2)

K-1: Please see traffic mitigation measures identified in Section 5.2 of the EIR.

K-2: Chapter 5.2 analyzed the impact of the project on Zion Avenue and included mitigation measure T-22. Widening the roadway to 4-Lane Major Street would mitigate the FPA impact to Zion Avenue. However, widening this roadway would impact surrounding residential properties, community character and on-street parking that is heavily utilized in this area. Therefore widening of this roadway segment is not recommended and The FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

K-3: Comment Noted.

K-4: Comment Noted.

K-5: Comment Noted.

Without the impact from any future growth this area presently needs a major supermarket just to handle the number of current people and families in Grantville and Allied Gardens. K-6

Implement and require more on-site parking as growth continues rather than leave people and the public with only the choice of street parking further causing on-going problems in new and established residential neighborhoods. K-7

Support Every Drop Counts and Think Blue Programs. The oil drippings and brake dust left behind from trucks and cars parked along public streets eventually makes its way to our storm drains, rivers, bays etc. This needs to be addressed. K-8

In overview, what are we going to leave our children and grandchildren if we don't come forward with reasonable thoughts, suggestions and recommendations that may not have been brought forward and offered before?

After all, if we can send a man to the moon why can't we find adequate solutions to the congestion, traffic and street parking issues around commercial complexes and apartment dwellings in and around our modest residential streets. It shouldn't be "It is what it is". Please do something to add your support for a better Allied Gardens/Grantville during the planning stages. K-9

As we move forward, Think Blue, water usage, infrastructure, road and entrance design, parking/public safety, traffic issues, street repair and sweeping needs etc within our neighborhood and cherished community.

Hopefully the above comments and concerns will be helpful in the planning process as we move forward with Grantville growth.

If any additional concerns come forward from others within our neighborhood during this upcoming weekend I will forward them immediately before the deadline.

Thank you for your time and understanding. Should you have any questions please don't hesitate to call me.

Ralph Richardson
619-820-8312

2

K-6: The Grantville FPA will result in an area that is pedestrian friendly, with Transit Orientated Development; however, the FPA does not propose specific projects. While there may be a perceived need for a supermarket it is not the purpose of the FPA to require the development of one.

K-7: The City has developed Parking regulations related to specific development types. These regulations are to ensure that a specific development includes the appropriate amount of parking for that use.

K-8: As described in section 5-8, all projects requiring discretionary approvals are subject to certain minimum storm water requirements to prevent stormwater pollution, including non-point sources from automobiles.

K-9: Impacts to transportation/circulation, water quality/use, and land use are analyzed in several sections of the EIR. Where impacts were identified, programmatic mitigation measures also have been proposed.

From: Ralph Richardson [ralphdr40@yahoo.com]
Sent: Friday, February 13, 2015 4:49 PM
To: DSD EAS
Subject: GRANTVILLE FOCUSED PLAN AMENDMENT PROJECT NUMBER (346289)

The following is in addition to earlier comments and concerns dated February 9, 2015.

Many residents who have been a long time part of this area for 40/50 plus years refer to Zion Avenue as the "Old Lady" of the community. Yes, the Old Lady has been abused and is worn, tired and unable to assume any more daily abuse. The Old Lady was only slightly worn before the City approved construction of KP Hospital and a major apartment complex, both of which take access on and off Zion Avenue.

If thats not enough, the City allowed and approved an overextended strip mall shopping commercial developement which further takes access on and off the Old Lady. After all, the Old Lady has been put through many added requests and many added tasks have been placed on her. She has never been recognized for any special facelift to accommodated the activity approved around her let alone the added traffic issues, congestion, public safety, lack of street sweeping, further storm drain pollution issues etc forced on her to accommodate even more punishment. L-1

The city went as far as to add a marked X Walk across the Old Lady to further encourage added pedestrians to the mix and use of the Old Lady. We in the neighborhood, all share the surprise that no one has been hit or killed in this crosswalk. It extends from the west sidewalk intersection of Archwood Avenue across the Old Lady into the setback planting areas of the hospital where auto traffic makes u-turns daily without any consideration for pedestrians etc. How much more can or should this Old Lady take?

If growth is the goal in this area lets make improvements not mistakes. Please do something to relieve the "Old Lady" from any future pain or disruption.

Your courtesy and cooperation are appreciated. If there are any questions please let me know. Thank you.

Ralph Richardson
619-820-8312

1

Letter L
Ralph Richardson (2of 2)

L-1: Chapter 5.2 analyzed the impact of the project on Zion Avenue and included mitigation measure T-22. Widening the roadway to 4-Lane Major Street would mitigate the FPA impact to Zion Avenue. However, widening this roadway would impact surrounding residential properties, community character and on-street parking that is heavily utilized in this area. Therefore widening of this roadway segment is not recommended and The FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

February 8, 2015

Rebecca Malone

Environmental Planner

City of San Diego Development Services Center

1222 First Ave., MS 501

San Diego, CA 92101

Dear Ms. Malone,

I would like to submit the following comments for review and consideration regarding the Grantville Focused Plan Amendment, Project No. 346289:

2.0 Environment Settings

2.3.10 Visual Effects/Neighborhood Character

Although section 5.10.1.2 (Local Visual Resource Regulations) states that in Chapter 13 of the Land Development Code regulations, information will be provided to include descriptions for building height, etc.; discussion within this section on Visual Effects/Neighborhood Character should have included information regarding possible building heights for the FPA based on the proposed density levels. M-1

2.3.13 Health and Safety

Nazareth School is located in close proximity to the FPA, yet there is no mention of the school, especially in regards to being a sensitive receptor to hazardous material/waste impacts from the proposed FPA area. Others schools or education-related facilities in the FPA were mentioned such as: "Little Sprouts Academy, Dehesa Charter School, Mission Nazarene Child Care, Academy of Learning Preschool, Junior Achievement of San Diego, and Gold N Child Care Services. National University and Stein Education Center are located in the vicinity of the proposed FPA". Nazareth School is also located in the vicinity of the proposed FPA . Why was the school omitted from this list of schools and day care facilities as a sensitive receptor? M-2

3.0 Project Description

"The amended CPIOZ will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation and allow for increased density of up to 109 dwelling-units per acre, for a maximum total of approximately 4,594 dwellings units in the area surrounding the existing Grantville trolley station when certain criteria are met. The list of criteria will be included in the text of the Navajo Community Plan as a focused amendment to the plan". Why were the criteria M-3

Letter M
Marilyn Reed (1 of 2)

M-1 The Land Development Code provides a number of requirements that limit development. In addition, there are no public views and the character of the area is the low rise industrial warehouses. Potential projects will be reviewed once submitted for consistency with the Land Development Code.

M-2: In the Final EIR, Nazareth School has been added to the list of schools in the Environmental Setting and Health and Safety sections.

M-3: The criteria were not included because the zoning and land use designation provide the intensity of development. The criteria are related to urban design. Each project will be different and thus the character of each project will be different.

for the development at this density level not included within the EIR under Visual Effects/Neighborhood Character so that it could be evaluated? M-3 cont.

The Project Description as stated in the Grantville Focused Plan Amendment is as follows: "The proposed FPA area is an approximately 280-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road, and Mission Gorge Road to Zion Avenue". However, in the Transportation Impact Study (Appendix B) and Air Quality and Greenhouse Gas Study (Appendix C), the Project Descriptions seems to contradict the number of acres as being 280. Instead, the acreage in these Project Descriptions is stated as: "Subarea A is 379-acre area comprised of commercial, office, industrial, public facility, park and open space . . ." and in the Programmatic Water Quality Technical Report the acreage is described as 400 acres. Why is there a discrepancy between the numbers of acres that were analyzed for the various elements of the Project's EIR? M-4

Section 5.1 Land Use

5.14.1.4 Park/Recreational Facilities

According to the formula standard of 2.8 usable acres per 1,000 residents, based on population increases, there will still be a park deficit of 23.63 acres and new park land needs to be set aside within the FPA to meet that deficit. To establish "new" park space for use by residents of the FPA in the communities of Allied Gardens, San Carlos and Del Cerro by creating Joint Use parks within community school is not meeting the intent of the City of Villages concept for "walkable" communities. None of the schools identified are within the FPA. Additionally, the redesignation of existing park space in Mission Trails Regional Park to help fill the deficit is not providing additional park land to meet the acreage requirement for future residents of Grantville. M-5

The Allied Gardens Recreation Center is the only active recreation area for youth and adult organized sports close to the FPA. The EIR acknowledges that "impacts to parks and recreational facilities would be considered significant." With increased traffic in the area and an aging facility, the AG Recreation Center will be over burdened with additional demands on already limited recreational space. Shouldn't the EIR have identified that as a significant impact which requires mitigation? M-6

5.2.1.1 Transportation/Circulation

In the section on "Existing Street Network", principle roadways were identified and studied among which is Twain and Waring Rd in the Allied Gardens Community. However, the intersection of Orcutt and Waring Rd. was not identified as part of the Traffic Study for the EIR. In the same study, the intersections of Princess View/Waring Rd. and Zion Ave./Waring Rd. were analyzed for traffic impacts and found to be significant. Since Orcutt connects with Twain (which is a major thoroughfare from Mission Gorge Rd. to Waring Rd.), why was this intersection not included in the Traffic Study? M-7

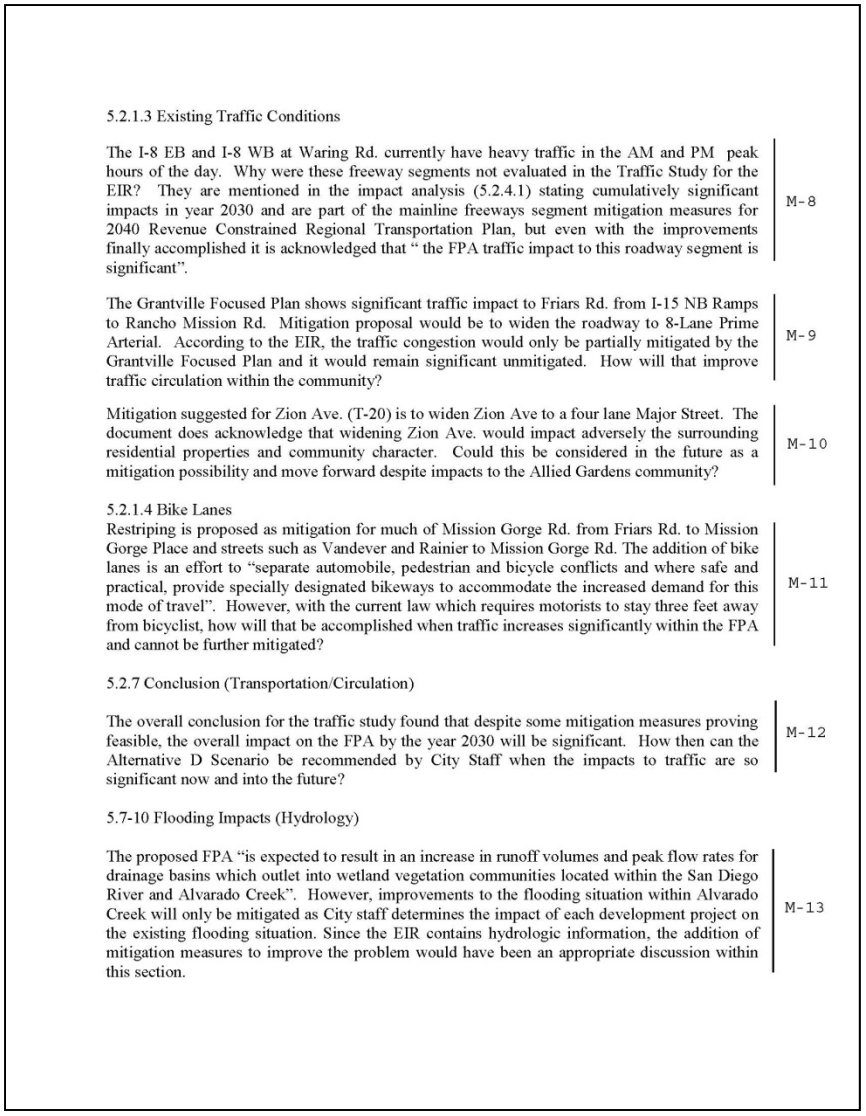
M-4: This is not a discrepancy. An adjustment was made in the area included in the FPA. See Chapter 4 – History of Project Changes.

M-5: The Public Facilities section of the draft EIR used outdated information to calculate the impact of the project on park and recreation facilities. The Public Facilities section has been updated and the Grantville FPA includes changes to the Navajo Community Plan and the Navajo Public Facilities Financing Plan that add new park facilities to the community. The final EIR has been amended to state the following:

> At community build out the Navajo Community population will require approximately 204 acres of population-based parks. Through the community update process an additional 72.46 acres of park land was identified for future acquisition and development, resulting in a 7.76 acre surplus in the Navajo Community.

The City's General Plan set policies pertaining to the pursuit of joint use facilities. Policy RE-E.2 directs the City to work with local school districts to expand the development of on-campus joint use recreation facilities. The implementation of the proposed FPA would result in new park and recreation facilities and joint use facilities as identified in the Public Facilities Financing Plan (PFFP). The developer fees collected as part of the PFFP is intended cover the development's share of use at any joint use facilities or potential new facilities.

M-6: The Allied Gardens Recreation Center expansion was included in the Navajo Public Facilities Financing Plan, and was therefore a component of the project. The impact on recreation facilities was less than significant because any future development in the proposed FPA area would be required to contribute a proportionate fair-share to the construction of park and recreational facilities through the mandatory payment of development impact fees. The CPA includes the following future improvements: replacement of the existing recreation center, a new 17,000 square foot building, expansion of the existing aquatic complex to provide indoor locker rooms and showers, new therapeutic pool, new children's pool and accessible upgrades to the children's play area, expansion of the spectator areas, and necessary upgrades to the existing pool.



5.2.1.3 Existing Traffic Conditions

The I-8 EB and I-8 WB at Waring Rd. currently have heavy traffic in the AM and PM peak hours of the day. Why were these freeway segments not evaluated in the Traffic Study for the EIR? They are mentioned in the impact analysis (5.2.4.1) stating cumulatively significant impacts in year 2030 and are part of the mainline freeways segment mitigation measures for 2040 Revenue Constrained Regional Transportation Plan, but even with the improvements finally accomplished it is acknowledged that " the FPA traffic impact to this roadway segment is significant". M-8

The Grantville Focused Plan shows significant traffic impact to Friars Rd. from I-15 NB Ramps to Rancho Mission Rd. Mitigation proposal would be to widen the roadway to 8-Lane Prime Arterial. According to the EIR, the traffic congestion would only be partially mitigated by the Grantville Focused Plan and it would remain significant unmitigated. How will that improve traffic circulation within the community? M-9

Mitigation suggested for Zion Ave. (T-20) is to widen Zion Ave to a four lane Major Street. The document does acknowledge that widening Zion Ave. would impact adversely the surrounding residential properties and community character. Could this be considered in the future as a mitigation possibility and move forward despite impacts to the Allied Gardens community? M-10

5.2.1.4 Bike Lanes

Restriping is proposed as mitigation for much of Mission Gorge Rd. from Friars Rd. to Mission Gorge Place and streets such as Vandever and Rainier to Mission Gorge Rd. The addition of bike lanes is an effort to "separate automobile, pedestrian and bicycle conflicts and where safe and practical, provide specially designated bikeways to accommodate the increased demand for this mode of travel". However, with the current law which requires motorists to stay three feet away from bicyclist, how will that be accomplished when traffic increases significantly within the FPA and cannot be further mitigated? M-11

5.2.7 Conclusion (Transportation/Circulation)

The overall conclusion for the traffic study found that despite some mitigation measures proving feasible, the overall impact on the FPA by the year 2030 will be significant. How then can the Alternative D Scenario be recommended by City Staff when the impacts to traffic are so significant now and into the future? M-12

5.7-10 Flooding Impacts (Hydrology)

The proposed FPA "is expected to result in an increase in runoff volumes and peak flow rates for drainage basins which outlet into wetland vegetation communities located within the San Diego River and Alvarado Creek". However, improvements to the flooding situation within Alvarado Creek will only be mitigated as City staff determines the impact of each development project on the existing flooding situation. Since the EIR contains hydrologic information, the addition of mitigation measures to improve the problem would have been an appropriate discussion within this section. M-13

M-7: Orcutt Avenue is not a circulation element roadway. Programmatic level projects study areas are established using several factors including:

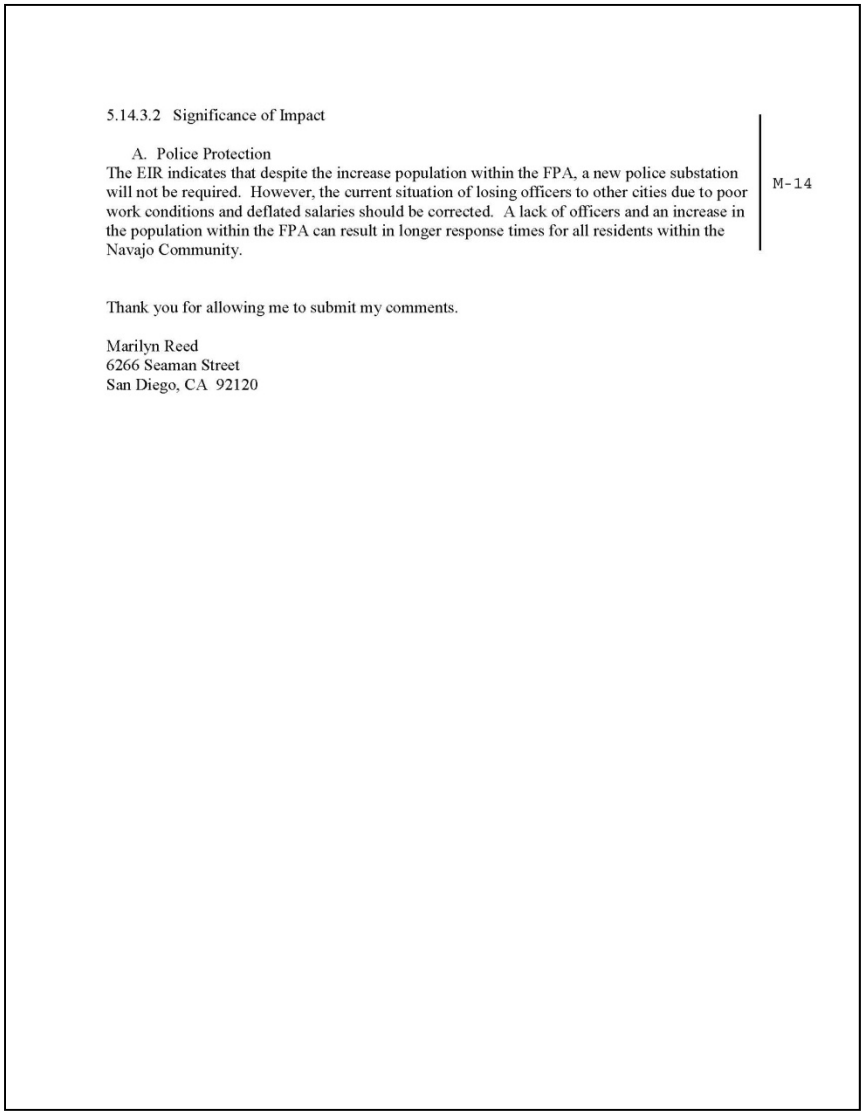
- Existing circulation element roadways intersecting with other existing circulation element roadways where both roadways function or are classified as a collector or higher
- Intersections that provide access to/from freeways
- Anticipated circulation element roadways intersecting with other existing and/or anticipated circulation element roadway where both roadways function or are classified as a collector or higher
- Key intersections where both intersecting streets meet one of the following conditions:
- 4-lanes (or greater)
- 3-lanes and carries over 15,000 ADT
- 2-lanes and carries over 10,000 ADT

M-8: Future overall regional growth including Grantville FPA traffic will affect this freeway segment. SANDAG 2050 Revenue Constrained RTP includes operational improvements along I-8 between I-15 and SR-125. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project. Therefore, impact to this segment will remain significant since it's not fully mitigated.

M-9: This segment of Friars Road is located within the Mission Valley Community Planning area and will be addressed as part of the upcoming Mission Valley Community Plan update. Additionally, impact to this location is mainly due to the increase in traffic associated with local and regional growth in the San Diego Region. Improvement to this location will improve regional accessibility to and from the I-15 freeway.

M-10: This roadway is currently classified as a 4 lane major and its classification will not change as part of this focused plan amendment.

M-11: Any repurposing of existing roadways to implement bike lanes will be coordinated with community representatives.



5.14.3.2 Significance of Impact

A. Police Protection

The EIR indicates that despite the increase population within the FPA, a new police substation will not be required. However, the current situation of losing officers to other cities due to poor work conditions and deflated salaries should be corrected. A lack of officers and an increase in the population within the FPA can result in longer response times for all residents within the Navajo Community. M-14

Thank you for allowing me to submit my comments.

Marilyn Reed
6266 Seaman Street
San Diego, CA 92120

M-12: The proposed FPA was developed through a series of design charrettes and several years of monthly stakeholder meetings in the Navajo community. Once the community selected its preferred land use scenario, staff moved forward with the proposed Focus Plan Amendment analyzed in this PEIR. The project alternatives analyzed in the PEIR also found significant impacts on traffic. Only the proposed FPA would meet the City's General Plan goals and create a walkable community with access to the San Diego River, the Grantville Trolley Station, and other amenities in the area.

M-13: The Hydrology Section of the PEIR has been amended to include a discussion of the project's location in the floodplain of Alvarado Creek. The section will also refer to the environmental setting section for a discussion of the existing floodplain and floodway; however, pursuant to CEQA caselaw, the document will not discuss the impacts of flooding on future projects.

The City is applying for grants and other funding opportunities to address the existing flood conditions. The environmental impacts of those actions will be analyzed once the scope of the flood control projects is determined. Since the proposed FPA does not include any actions to address flooding, a discussion of the impacts and mitigation of flood control projects is speculative.

M-14: Improving the staffing of police substations is not considered an environmental impact, because there is no change to the physical environment, therefore it is not required to be analyzed in CEQA documents.

February 8, 2015

Rebecca Malone

Environmental Planner

City of San Diego Development Services Center

1222 First Ave., MS 501

San Diego, CA 92101

Dear Ms. Malone,

On behalf of the Allied Gardens/Grantville Community Council, I would like to submit the following questions and comments regarding the Grantville Focused Plan Amendment, Project No. 346289:

2.0 Environmental Settings

2.3.10 Visual Effects/ Neighborhood Character

"Public views (within the FPA) towards . . . scenic resources (designated scenic viewpoints or landmarks) are minimal and scattered throughout the community". This statement does not take into account that many residences within Allied Gardens have views of Mission Valley or the San Diego River and many homes are in close proximity to the FPA. Some of the proposed high density, multifamily residential developments could be of substantial building height. Therefore, significant impact to individual residences in the Allied Gardens area may occur by causing the loss of views as well as affecting the general neighborhood character of the Allied Gardens community.

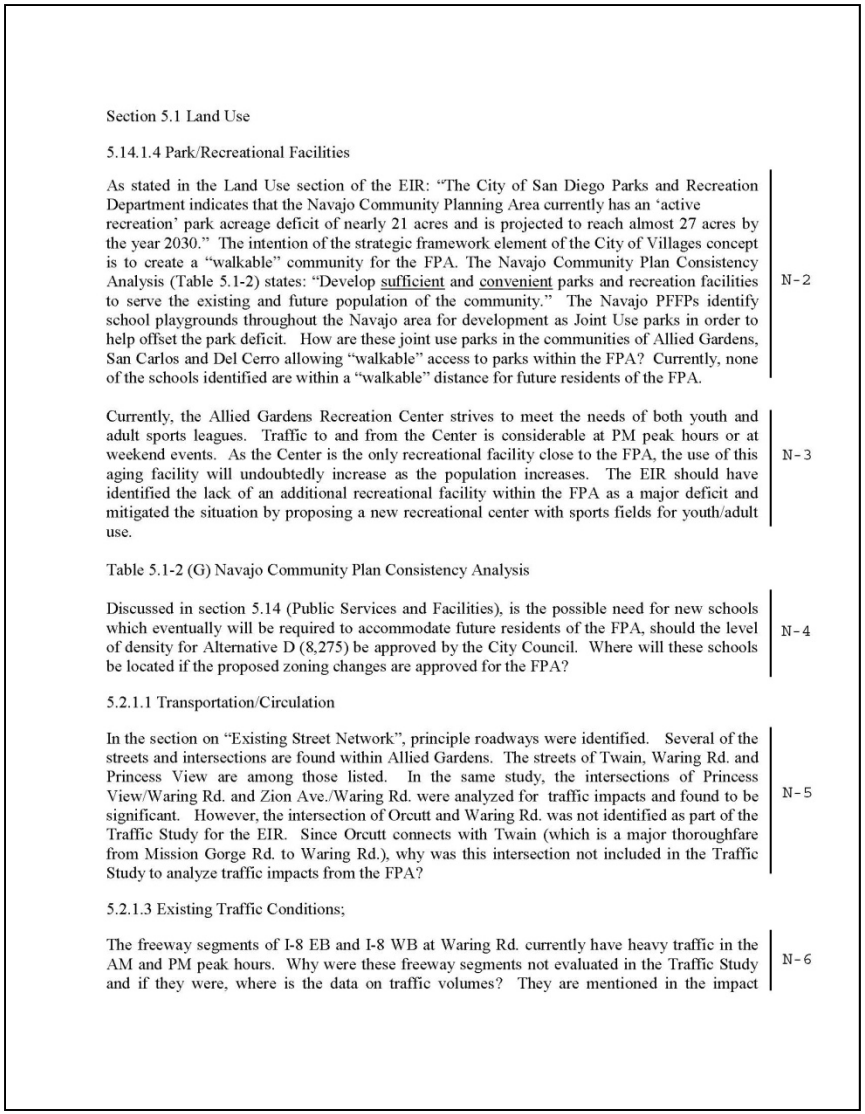
Although section 5.10.1.2 (Local Visual Resource Regulations) states that in Chapter 13 of the Land Development Code regulations, information will be provided to include descriptions for building height, etc.; discussion within this section on Visual Effects/Neighborhood Character should have included information regarding the building heights for projects.

N-1

Additionally, in section 5.10.3.1 is the following statement: "The proposed FPA would provide the opportunity for new public "viewsheds: to be exposed because the new structures would be designed to be more vertical in nature ….." The "viewsheds" would be advantageous for those who occupy the buildings and use the structures, but for residents within the community of Allied Gardens, the height of those "viewsheds" could prove to be a distraction and devalue property should the buildings obscure views currently enjoyed by residents.

Letter N
Marilyn Reed/ Allied Gardens/Grantville Community Council (2 of 2)

N-1: See Response M-1



Section 5.1 Land Use

5.14.1.4 Park/Recreational Facilities

As stated in the Land Use section of the EIR: "The City of San Diego Parks and Recreation Department indicates that the Navajo Community Planning Area currently has an 'active recreation' park acreage deficit of nearly 21 acres and is projected to reach almost 27 acres by the year 2030." The intention of the strategic framework element of the City of Villages concept is to create a "walkable" community for the FPA. The Navajo Community Plan Consistency Analysis (Table 5.1-2) states: "Develop sufficient and convenient parks and recreation facilities to serve the existing and future population of the community." The Navajo PFFPs identify school playgrounds throughout the Navajo area for development as Joint Use parks in order to help offset the park deficit. How are these joint use parks in the communities of Allied Gardens, San Carlos and Del Cerro allowing "walkable" access to parks within the FPA? Currently, none of the schools identified are within a "walkable" distance for future residents of the FPA. N-2

Currently, the Allied Gardens Recreation Center strives to meet the needs of both youth and adult sports leagues. Traffic to and from the Center is considerable at PM peak hours or at weekend events. As the Center is the only recreational facility close to the FPA, the use of this aging facility will undoubtedly increase as the population increases. The EIR should have identified the lack of an additional recreational facility within the FPA as a major deficit and mitigated the situation by proposing a new recreational center with sports fields for youth/adult use. N-3

Table 5.1-2 (G) Navajo Community Plan Consistency Analysis

Discussed in section 5.14 (Public Services and Facilities), is the possible need for new schools which eventually will be required to accommodate future residents of the FPA, should the level of density for Alternative D (8,275) be approved by the City Council. Where will these schools be located if the proposed zoning changes are approved for the FPA? N-4

5.2.1.1 Transportation/Circulation

In the section on "Existing Street Network", principle roadways were identified. Several of the streets and intersections are found within Allied Gardens. The streets of Twain, Waring Rd. and Princess View are among those listed. In the same study, the intersections of Princess View/Waring Rd. and Zion Ave./Waring Rd. were analyzed for traffic impacts and found to be significant. However, the intersection of Orcutt and Waring Rd. was not identified as part of the Traffic Study for the EIR. Since Orcutt connects with Twain (which is a major thoroughfare from Mission Gorge Rd. to Waring Rd.), why was this intersection not included in the Traffic Study to analyze traffic impacts from the FPA? N-5

5.2.1.3 Existing Traffic Conditions;

The freeway segments of I-8 EB and I-8 WB at Waring Rd. currently have heavy traffic in the AM and PM peak hours. Why were these freeway segments not evaluated in the Traffic Study and if they were, where is the data on traffic volumes? They are mentioned in the impact N-6

N-2: See Response M-5.

N-3: See Response M-6.

N-4: The City of San Diego is unable to determine the location of future schools. California Government Code 65996 dictates 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.

N-5: Refer to Response M-7

N-6 Refer to Response M-8

analysis (5.2.4.1) stating cumulatively significant impacts in year 2030 and are part of the mainline freeways segment mitigation measures for 2040 Revenue Constrained Regional Transportation Plan, but when the improvements are finally accomplished it is acknowledged that " the FPA traffic impact to this roadway segment is significant". N-6 cont.

The Grantville Focused Plan shows significant traffic impact to Friars Rd. from I-15 NB Ramps to Rancho Mission Rd. Mitigation proposal would be to widen the roadway to 8-Lane Prime Arterial. According to the EIR, traffic congestion would only be partially mitigated by the Grantville Focused Plan and it would remain "significant unmitigated". Currently, during peak AM hours, traffic volume is high and access very slow to the I-15NB. Are other mitigation proposals being considered to help this situation? N-7

A proposed mitigation project (T-20) for Zion Ave. would be to widen Zion Ave. to a four lane Major Street. The Traffic Study does acknowledge that widening Zion Ave. would impact adversely the surrounding residential properties and community character. This mitigation project would not be a benefit to our community and should reconsideration be given to moving forward due to traffic impacts from Grantville in the future, will the community have an opportunity to comment prior to any changes to Zion Ave.? N-8

5.2.2.2 Significant Impact

In Table 5.2-10 intersections and street segment operations within the Allied Gardens Community are projected in 2030 to have the following rating of a LOS F:

a. Waring Rd/Princess View Dr.
b. Waring Rd./Princess View Dr.
c. Waring Rd./Zion Ave
d. Mission Gorge Rd./Zion Ave.
e. Zion Ave.: Mission Gorge Rd. to Waring Rd.

The lack of effective mitigation for many of the streets analyzed by the Traffic Study in both Grantville and Allied Gardens remains a major concern of residents and it appears nothing can be effectively done to alleviate such major impacts even with the partial widening and restriping of such roads as Mission Gorge Rd and Fairmont. N-9

5.2.7 Conclusion (Transportation/Circulation)

The overall conclusion for the traffic study found that despite some "mitigation measures proving feasible", the overall impact on the FPA by the year 2030 will be significant. How then can the Alternative D Scenario of 8,257 units in the FPA be recommended if traffic circulation will be such a significant problem for the future?

Section 5.7 Hydrology/ Section 5.8 Water Quality

The proposed FPA "is expected to result in an increase in runoff volumes and peak flow rates for drainage basins which outlet into wetland vegetation communities located within the San Diego N-10

N-7: Refer to Response M-9

N-8: Refer to Response M-10

N-9: Mitigation measure is being proposed to improve traffic operation at the listed locations. As to other mitigation measures, the EIR identified those measures that could feasibility be implemented within the planning area and determined that the resulting impacts would remain significant

N-10: Refer to Response M-13

River and Alvarado Creek". However, improvements to correct the flooding situation within Alvarado Creek will only be mitigated as City staff determines the impact of each development project on the existing conditions. Since the EIR contains hydrologic information, the addition of mitigation measures for improvements of the flooding problem would have been an appropriate discussion within this section. N-10 cont.

5.14.3.2 Significance of Impact

A. Police Protection

Although the increase in population as a result of the proposed FPA does not indicate the need for a new Police Substation according to the EIR, response time may be impacted if the current situation of hiring and retaining police officers is not corrected. What is being done to improve the staffing of substations such as the Eastern Division with adequate numbers of police officers to handle an increase in population of almost 16,000 people over the next fifteen years? N-11

Thank you for the opportunity to comment on the Grantville Focused Plan Amendment.

Marilyn Reed

Allied Gardens/Grantville Community Council Member
P.O. Box 600425
San Diego, CA 92160

N-11: Refer to Response M-14

From: KILIAN ROEVER [nearborder@hotmail.com]
Sent: Wednesday, February 18, 2015 9:13 AM
To: DSD EAS
Cc: nearborder@hotmail.com
Subject: 346289 Grantville

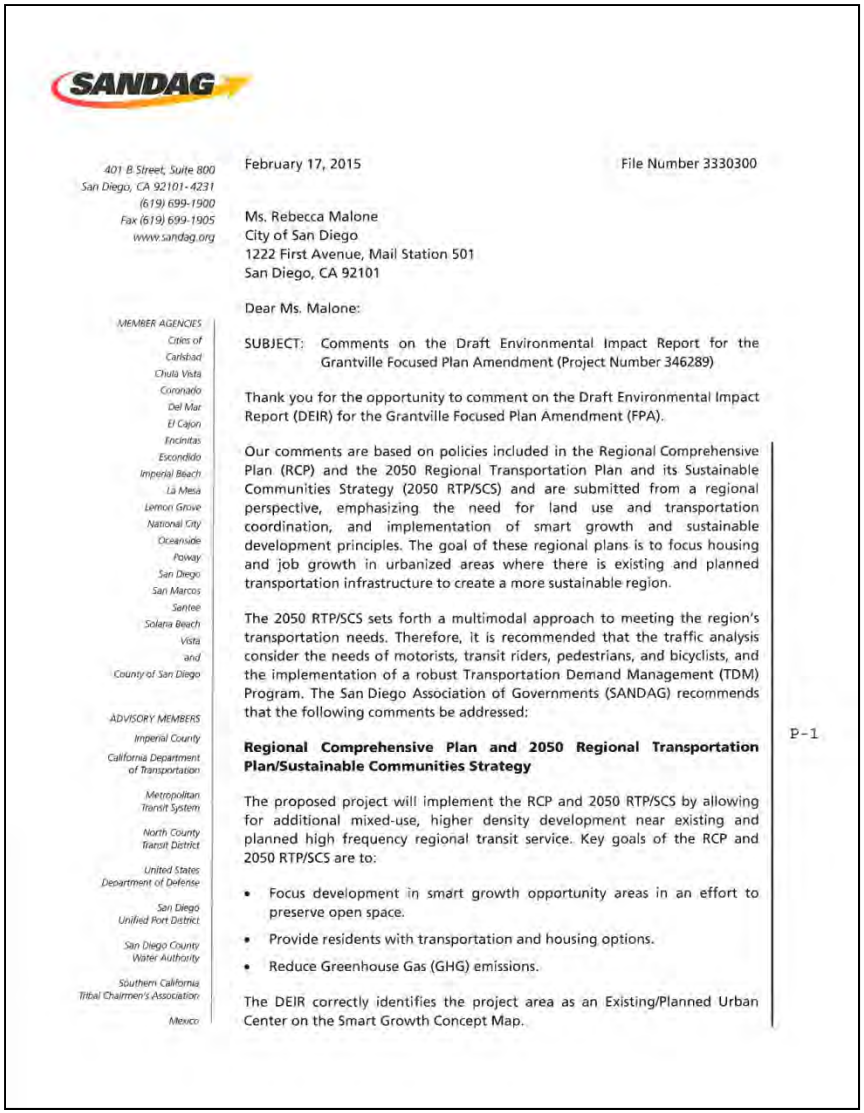
No! What part of "No!" does this report not understand? It can explain how to fix the SNAFU that is Mission Valley now, w/ its dense traffic. Why would anyone except the mist craven of carpet-bagging profiteers suggest worsening the mess w/ still more people & vehicles jammed in? O-1

Kilian Roever
858-581-1709
Movie-goer in MV,
Resident in La Jolla, w/another traffic mess.

1

Letter O
Kilian Roever

O-1: Comment noted.



SANDAG

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

February 17, 2015 File Number 3330300

Ms. Rebecca Malone
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Dear Ms. Malone:

SUBJECT: Comments on the Draft Environmental Impact Report for the Grantville Focused Plan Amendment (Project Number 346289)

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Grantville Focused Plan Amendment (FPA).

Our comments are based on policies included in the Regional Comprehensive Plan (RCP) and the 2050 Regional Transportation Plan and its Sustainable Communities Strategy (2050 RTP/SCS) and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination, and implementation of smart growth and sustainable development principles. The goal of these regional plans is to focus housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The 2050 RTP/SCS sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the traffic analysis consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program. The San Diego Association of Governments (SANDAG) recommends that the following comments be addressed:

P-1

Regional Comprehensive Plan and 2050 Regional Transportation Plan/Sustainable Communities Strategy

The proposed project will implement the RCP and 2050 RTP/SCS by allowing for additional mixed-use, higher density development near existing and planned high frequency regional transit service. Key goals of the RCP and 2050 RTP/SCS are to:

- Focus development in smart growth opportunity areas in an effort to preserve open space.
- Provide residents with transportation and housing options.
- Reduce Greenhouse Gas (GHG) emissions.

The DEIR correctly identifies the project area as an Existing/Planned Urban Center on the Smart Growth Concept Map.

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

Letter P
SANDAG

P-1: Introductory comments and description of project understanding are noted.

SANDAG staff has identified some inaccurate regional transportation network phasing references in the DEIR which are clarified below:

The Interstate 15 (I-15) Northbound and Southbound project from Aero Drive to Interstate 8 (I-8) is phased for 2020 in the 2050 RTP/SCS. The DEIR indicates the project is phased for 2040. Please make the phasing consistent with the 2050 RTP/SCS for all instances:

- Page ES-16, Section T-27 thu T-30.
- Page 5.2-39, Section T-27 thru T-30.
- Page 11-9, Mitigation Measures T-27 thru T-30.

P-2

The I-8 Eastbound and Westbound project from I-15 to Waring Road is phased for 2040 in the 2050 RTP/SCS. The DEIR indicates 2020. Please make the phasing consistent with the 2050 RTP/SCS for all instances:

- Page ES-16, Section T-31 thu T-34.
- Page 5.2-39, Section T-31 thru T-34.
- Page 11-9, Mitigation Measures T-31 thru T-34.

Series 13 Subregional Growth Forecast

On October 25, 2013, the SANDAG Board of Directors accepted the Series 13 Regional Growth Forecast for planning purposes. The DEIR should reference the latest forecast. Page 5.1-10 of the DEIR references Series 12 Growth Forecast. The current Series 13 Growth Forecast projects 1,596,870.

P-3

Interstate 8 Corridor Study Active Transportation Improvements

Providing safe and efficient routes to and from the Grantville Transit Station in the bicycle circulation plan can help to encourage active transportation, as well as transit ridership. SANDAG, in coordination with the City of San Diego and Caltrans, is preparing the I-8 Corridor Study (Study), which identifies Grantville as a focus area for enhanced bicycle and pedestrian access. The Study suggests a number of bicycle and pedestrian improvement projects that the City of San Diego may choose to consider including in Section T-24 Bicycle Circulation Improvements and T-23 Pedestrian Circulation Improvements.

P-4

SANDAG appreciates continued coordination on the Study in conjunction with the Grantville FPA. Please contact Christine Eary, Regional Planner, at (619) 699-6928 or christine.eary@sandag.org to discuss the recommendations being developed for the Grantville FPA area for possible inclusion in the plan.

Pedestrian Plan

Most transit planning literature suggests that people are willing to walk more than one-quarter mile to a transit station if the walk environment is seen as safe, direct, and has an active and inviting streetscape geared to the pedestrian. The Grantville Transit Station has the potential, therefore, to be within walking distance of the Urban Village identified on Figure 3-8 if a well-thought out pedestrian plan were developed. Non-contiguous sidewalk design, pedestrian-level

P-5

2

P-2: Information will be updated for consistency with RTP 2050

P-3: The Final EIR has been amended to include the updated population forecast.

P-4: Comment noted.

P-5: Comment noted.

lighting, and traffic calmed intersections are examples of improvements that could be considered to create a walkable community. P-5 cont.

Transportation Demand Management

In considering mitigation for regional transportation impacts that result from the Grantville FPA, please also consider these TDM strategies to encourage alternatives to driving alone and facilitate improved access to light rail:

- Shuttle service that connects the Grantville Trolley station to employment and residential destinations.
- Pedestrian plan to create a more walkable environment.
- Secure group bike parking at the Grantville Trolley station.
- Expansion of areas for carshare and bikeshare services.
- Priority carpool and vanpool parking near transit and employment sites.
- Promote regional TDM programs and services (e.g. RideMatcher, Regional Vanpool Program, Guaranteed Road Home, SchoolPool). P-6

Please also consider measures to incentivize the incorporation of TDM strategies early on in the development process to complement the project objective of incentivizing development within the Grantville Community Plan Implementation Overlay Zone (CPIOZ) with streamlined permit processing.

SANDAG provides marketing and promotion of regional TDM programs and services such as the Regional Vanpool Program, online RideMatcher, multimodal trip planning, Guaranteed Ride Home, and SchoolPool that could assist with reducing traffic congestion and GHG emissions in and around the Grantville FPA. These programs can be accessed through icommutesd.com.

The SANDAG TDM staff is happy to assist with potential integration of these measures. Please contact Antoinette Meier, Transportation Planner, at (619) 699-0709 or antoinette.meier@sandag.org

Roadway Restriping

A number of the transportation mitigation measures outlined in Table ES-1 involve restriping roadways for additional turning lanes. Please ensure that restriping efforts do not impair bicycle and pedestrian safety. P-7

Roadway Widening

A roadway widening plan is outlined in Table ES-1. The proposed roadway widenings present a variety of opportunities to provide improved bicycle access throughout the plan area. Consider the inclusion of enhanced Class II bicycle lanes or cycletracks as part of the widening projects to provide improved access for bicyclists riding alongside vehicles traveling at high speeds. Specific opportunity areas could include the roadway segment of Friars Road throughout Mission Valley, as well as the proposed widening of Friars Road to an Eight-Lane Prime Arterial from I-15 northbound ramps to Rancho Mission Road, and on to Santo Road (T-8 and T-9). P-8

3

P-6: Transit-oriented development, transportation demand management, and multi-modal connectivity are priorities for the City. TDM information is part of the LDC and is listed as an information item on the City's website as well.

P-7: Comment noted.

P-8: Comment noted. Improvement within Mission Valley will be coordinated with SANDAG in the upcoming Mission Valley Community Plan Update

In planning for roadway widenings, consider intersection designs that provide crossing opportunities for vulnerable pedestrians, such as people who are elderly or have disabilities, by including median refuges, advanced pedestrian signal intervals, and/or other pedestrian supportive alternatives. Please see the *SANDAG Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region* for examples. P-9

Freeway Ramp Improvements

If improvements are planned at freeway ramp locations, please consider strategies for providing safe crossing opportunities for pedestrians and bicyclists by requiring freeway-bound or exiting vehicles to stop (stop sign or stoplight) before transitioning between the freeway and the roadway, and vice versa. P-10

Parking Management Resources

Developing a parking management plan customized for the FPA could assist with reducing parking demand while encouraging the use of transportation alternatives. The SANDAG Regional Parking Management Toolbox provides a framework for evaluating, implementing, and managing parking management strategies that can be tailored to support individual community economic development, sustainability, and mobility goals. P-11

This interactive document provides a broad set of tools and step-by-step instructions for shaping successful parking management programs that address the unique challenges and needs of different types of communities. To learn more, you may access the SANDAG Regional Parking Management Toolbox at sdforward.com/mobility-planning/regional-parking-management-toolbox.

Other Considerations

We appreciate the opportunity to comment on the DEIR for the Grantville FPA.

We encourage, where appropriate, consideration of the following tools in evaluating this project based on these SANDAG publications (which can be found on our website at sandag.org/igr): P-12

1. Designing for Smart Growth, Creating Great Places in the San Diego Region
2. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
3. Trip Generation for Smart Growth
4. Parking Strategies for Smart Growth
5. Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports
6. Integrating Transportation Demand Management into the Planning and Development Process - A Reference for Cities
7. Riding to 2050, the San Diego Regional Bike Plan
8. SANDAG Regional Parking Management Toolbox

4

P-9 The issues identified will be addressed during the project level design process.

P-10: Refer to Response P-9

P-11: Comment noted.

P-12: Comment noted.

If you have any questions or concerns regarding this letter, please contact me at (619) 699-1943 or susan.baldwin@sandag.org.

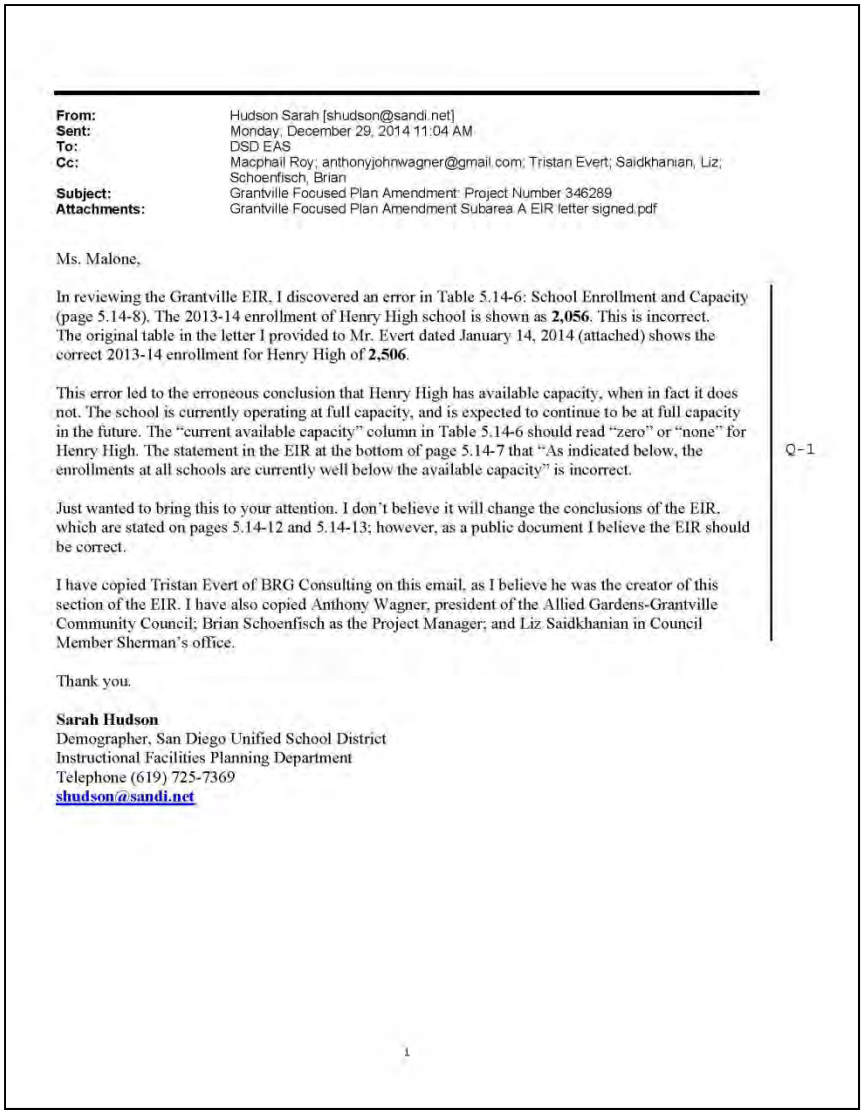
Sincerely,

Susan Baldwin

SUSAN BALDWIN
Senior Regional Planner

SBA/SST/asa

5



From: Hudson Sarah [shudson@sandi.net]
Sent: Monday, December 29, 2014 11:04 AM
To: DSD EAS
Cc: Macphail Roy; anthonyjohnwagner@gmail.com; Tristan Evert; Saidkhanian, Liz; Schoenfisch, Brian
Subject: Grantville Focused Plan Amendment· Project Number 346289
Attachments: Grantville Focused Plan Amendment Subarea A EIR letter signed.pdf

Ms. Malone,

In reviewing the Grantville EIR, I discovered an error in Table 5.14-6: School Enrollment and Capacity (page 5.14-8). The 2013-14 enrollment of Henry High school is shown as **2,056**. This is incorrect. The original table in the letter I provided to Mr. Evert dated January 14, 2014 (attached) shows the correct 2013-14 enrollment for Henry High of **2,506**.

This error led to the erroneous conclusion that Henry High has available capacity, when in fact it does not. The school is currently operating at full capacity, and is expected to continue to be at full capacity in the future. The "current available capacity" column in Table 5.14-6 should read "zero" or "none" for Henry High. The statement in the EIR at the bottom of page 5.14-7 that "As indicated below, the enrollments at all schools are currently well below the available capacity" is incorrect. Q-1

Just wanted to bring this to your attention. I don't believe it will change the conclusions of the EIR, which are stated on pages 5.14-12 and 5.14-13; however, as a public document I believe the EIR should be correct.

I have copied Tristan Evert of BRG Consulting on this email, as I believe he was the creator of this section of the EIR. I have also copied Anthony Wagner, president of the Allied Gardens-Grantville Community Council; Brian Schoenfisch as the Project Manager; and Liz Saidkhanian in Council Member Sherman's office.

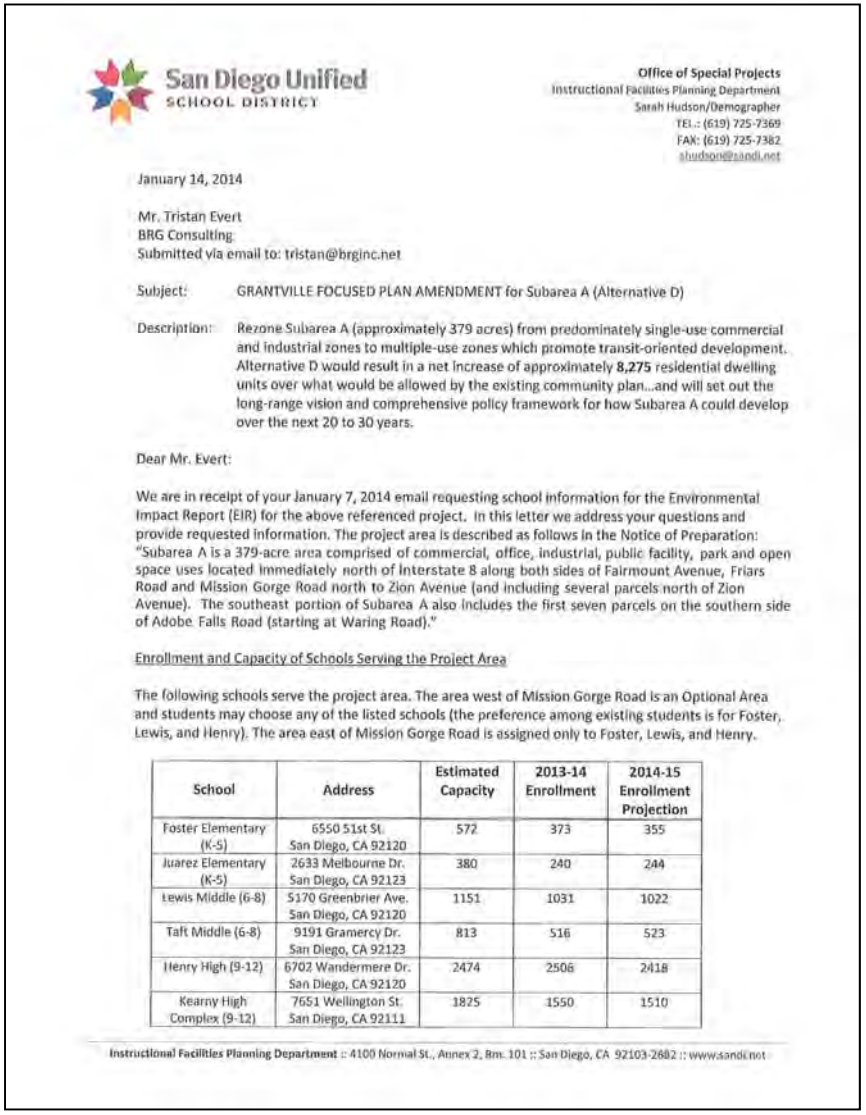
Thank you.

Sarah Hudson
Demographer, San Diego Unified School District
Instructional Facilities Planning Department
Telephone (619) 725-7369
shudson@sandi.net

1

Letter Q
San Diego Unified School District

Q-1: The Final EIR will be updated to reflect the correct enrollment and capacity for Henry High.



San Diego Unified
SCHOOL DISTRICT

Office of Special Projects
Instructional Facilities Planning Department
Sarah Hudson/Demographer
TEL.: (619) 725-7369
FAX: (619) 725-7382
shudson@sandi.net

January 14, 2014

Mr. Tristan Evert
BRG Consulting
Submitted via email to: tristan@brginc.net

Subject: GRANTVILLE FOCUSED PLAN AMENDMENT for Subarea A (Alternative D)

Description: Rezone Subarea A (approximately 379 acres) from predominately single-use commercial and industrial zones to multiple-use zones which promote transit-oriented development. Alternative D would result in a net increase of approximately **8,275** residential dwelling units over what would be allowed by the existing community plan...and will set out the long-range vision and comprehensive policy framework for how Subarea A could develop over the next 20 to 30 years.

Dear Mr. Evert:

We are in receipt of your January 7, 2014 email requesting school information for the Environmental Impact Report (EIR) for the above referenced project. In this letter we address your questions and provide requested information. The project area is described as follows in the Notice of Preparation: "Subarea A is a 379-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road)."

Enrollment and Capacity of Schools Serving the Project Area

The following schools serve the project area. The area west of Mission Gorge Road is an Optional Area and students may choose any of the listed schools (the preference among existing students is for Foster, Lewis, and Henry). The area east of Mission Gorge Road is assigned only to Foster, Lewis, and Henry.

School	Address	Estimated Capacity	2013-14 Enrollment	2014-15 Enrollment Projection
Foster Elementary (K-5)	6550 51st St. San Diego, CA 92120	572	373	355
Juarez Elementary (K-5)	2633 Melbourne Dr. San Diego, CA 92123	380	240	244
Lewis Middle (6-8)	5170 Greenbrier Ave. San Diego, CA 92120	1151	1031	1022
Taft Middle (6-8)	9191 Gramercy Dr. San Diego, CA 92123	813	516	523
Henry High (9-12)	6702 Wandermere Dr. San Diego, CA 92120	2474	2506	2418
Kearny High Complex (9-12)	7651 Wellington St. San Diego, CA 92111	1825	1550	1510

Instructional Facilities Planning Department :: 4100 Normal St., Annex 2, Rm. 101 :: San Diego, CA 92103-2682 :: www.sandi.net

Exhibit viewed



Letter to Mr. Tristan Evert re: Grantville Focused Plan Amendment for Subarea A
Page 2 of 2
January 14, 2014

Capacities are approximate and are calculated using current class size ratios; if class sizes ratios change, additional or less capacity may be available. Attendance boundaries are reviewed annually and may change. Inclusion in the above table does not guarantee that these schools will serve any future residential development in the project area. Student enrollment from this project, from nearby single-family residential neighborhoods, and from nearby proposed developments will impact available capacity at schools over the life of the project.

Student Generation Rates and Long-Term School Capacity

Student generation rates vary based on the type of project, number of units, bedroom mix, affordable or senior housing components, proximity to schools, amenities, neighborhood, and other factors. There are not district standard rates. The information available about this project at this time is too vague to produce reliable student generation estimates.

However, we can state that the cumulative potential increase in students from this project, from nearby proposed developments, and enrollment from existing nearby single-family residential neighborhoods, will likely impact district schools to the point of reaching or exceeding capacity. Therefore, new or expanded school facilities will likely be needed.

Over the past several years this office has communicated with various parties involved with planning and development in the Grantville area. Therefore, we are aware of the potential for significant increase in the housing stock as part of Grantville redevelopment. As redevelopment plans continue to be developed and formalized, this office will continue to assess the district's staff and facilities to ensure that additional students resulting from new residential development will be accommodated.

Please keep us apprised of revisions to the development plan as new information may result in changes to what is stated in this letter. Thank you.

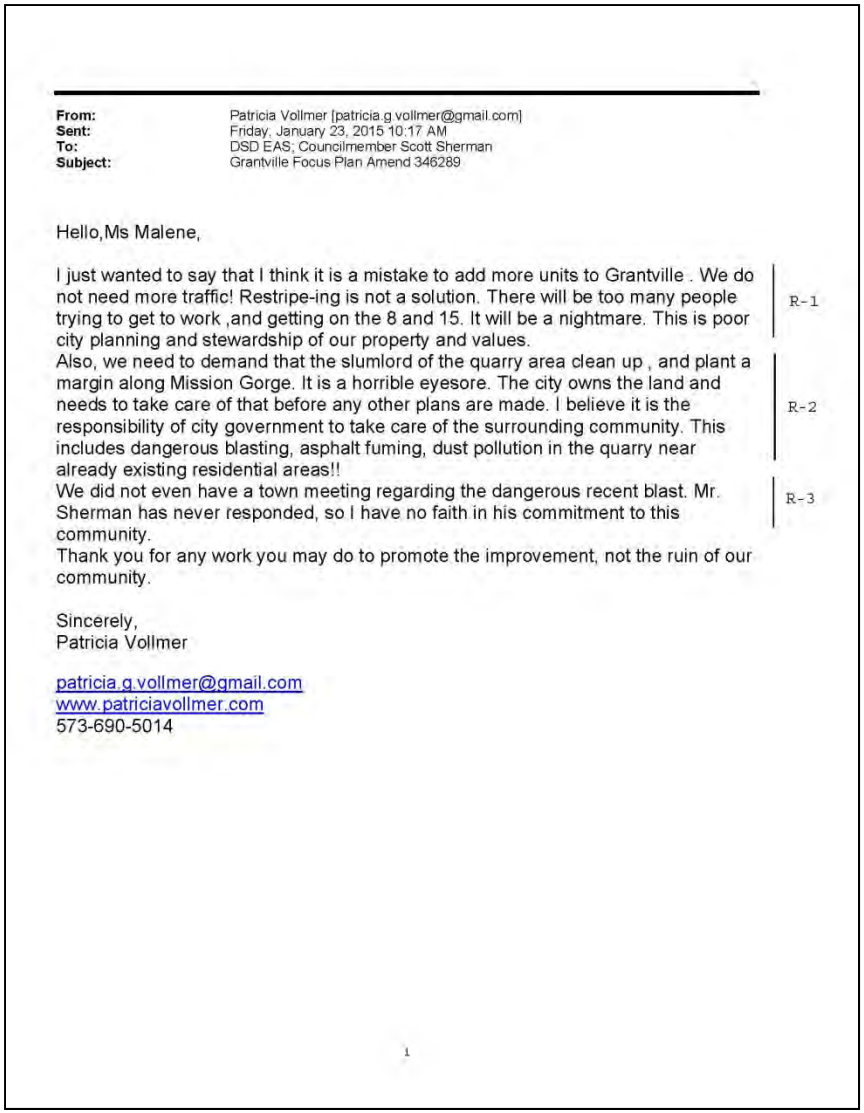
Sincerely,

Sarah Hudson
Demographer

\\\ [illegible] \Grantville\Grantville Focused Plan Amendment SubArea A EIR letter.docx

2

Exhibit viewed



From: Patricia Vollmer [patricia.g.vollmer@gmail.com]
Sent: Friday, January 23, 2015 10:17 AM
To: DSD EAS; Councilmember Scott Sherman
Subject: Grantville Focus Plan Amend 346289

Hello,Ms Malene,

I just wanted to say that I think it is a mistake to add more units to Grantville . We do not need more traffic! Restripe-ing is not a solution. There will be too many people trying to get to work ,and getting on the 8 and 15. It will be a nightmare. This is poor city planning and stewardship of our property and values. R-1

Also, we need to demand that the slumlord of the quarry area clean up , and plant a margin along Mission Gorge. It is a horrible eyesore. The city owns the land and needs to take care of that before any other plans are made. I believe it is the responsibility of city government to take care of the surrounding community. This includes dangerous blasting, asphalt fuming, dust pollution in the quarry near already existing residential areas!! R-2

We did not even have a town meeting regarding the dangerous recent blast. Mr. Sherman has never responded, so I have no faith in his commitment to this community. R-3

Thank you for any work you may do to promote the improvement, not the ruin of our community.

Sincerely,
Patricia Vollmer

patricia.g.vollmer@gmail.com
www.patriciavollmer.com
573-690-5014

1

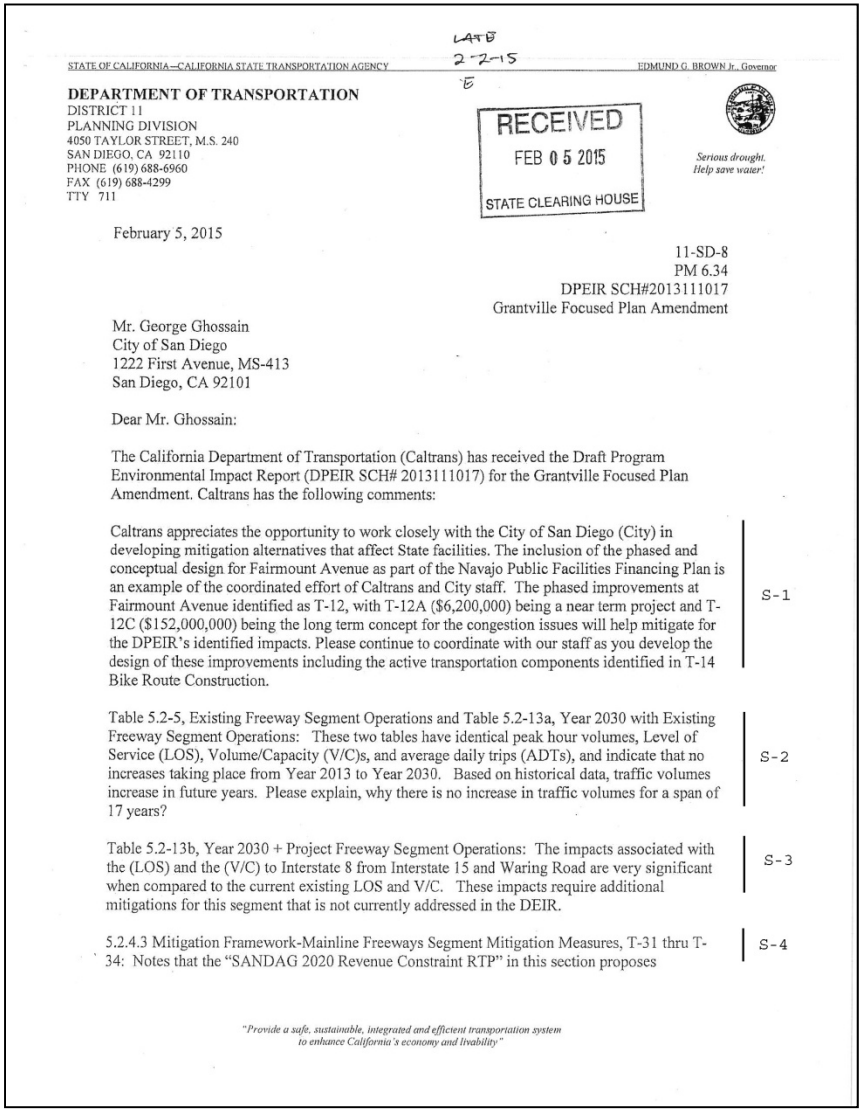
Letter R
Patricia Vollmer

R-1: The EIR discusses the potential impacts of the proposed plan amendment. The comment is on whether to implement the plan or not.

R-2: This comment is on an issue that is not part of the project or the analysis presented in the EIR.

R-3: This comment is on an issue that is not part of the project or the analysis presented in the EIR.

Letter S
California Department of Transportation



LATE
2-2-15
E

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

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
PLANNING DIVISION
4050 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711

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February 5, 2015

11-SD-8
PM 6.34
DPEIR SCH#2013111017
Grantville Focused Plan Amendment

Mr. George Ghossain
City of San Diego
1222 First Avenue, MS-413
San Diego, CA 92101

Dear Mr. Ghossain:

The California Department of Transportation (Caltrans) has received the Draft Program Environmental Impact Report (DPEIR SCH# 2013111017) for the Grantville Focused Plan Amendment. Caltrans has the following comments:

Caltrans appreciates the opportunity to work closely with the City of San Diego (City) in developing mitigation alternatives that affect State facilities. The inclusion of the phased and conceptual design for Fairmount Avenue as part of the Navajo Public Facilities Financing Plan is an example of the coordinated effort of Caltrans and City staff. The phased improvements at Fairmount Avenue identified as T-12, with T-12A ($6,200,000) being a near term project and T-12C ($152,000,000) being the long term concept for the congestion issues will help mitigate for the DPEIR's identified impacts. Please continue to coordinate with our staff as you develop the design of these improvements including the active transportation components identified in T-14 Bike Route Construction. S-1

Table 5.2-5, Existing Freeway Segment Operations and Table 5.2-13a, Year 2030 with Existing Freeway Segment Operations: These two tables have identical peak hour volumes, Level of Service (LOS), Volume/Capacity (V/C)s, and average daily trips (ADTs), and indicate that no increases taking place from Year 2013 to Year 2030. Based on historical data, traffic volumes increase in future years. Please explain, why there is no increase in traffic volumes for a span of 17 years? S-2

Table 5.2-13b, Year 2030 + Project Freeway Segment Operations: The impacts associated with the (LOS) and the (V/C) to Interstate 8 from Interstate 15 and Waring Road are very significant when compared to the current existing LOS and V/C. These impacts require additional mitigations for this segment that is not currently addressed in the DEIR. S-3

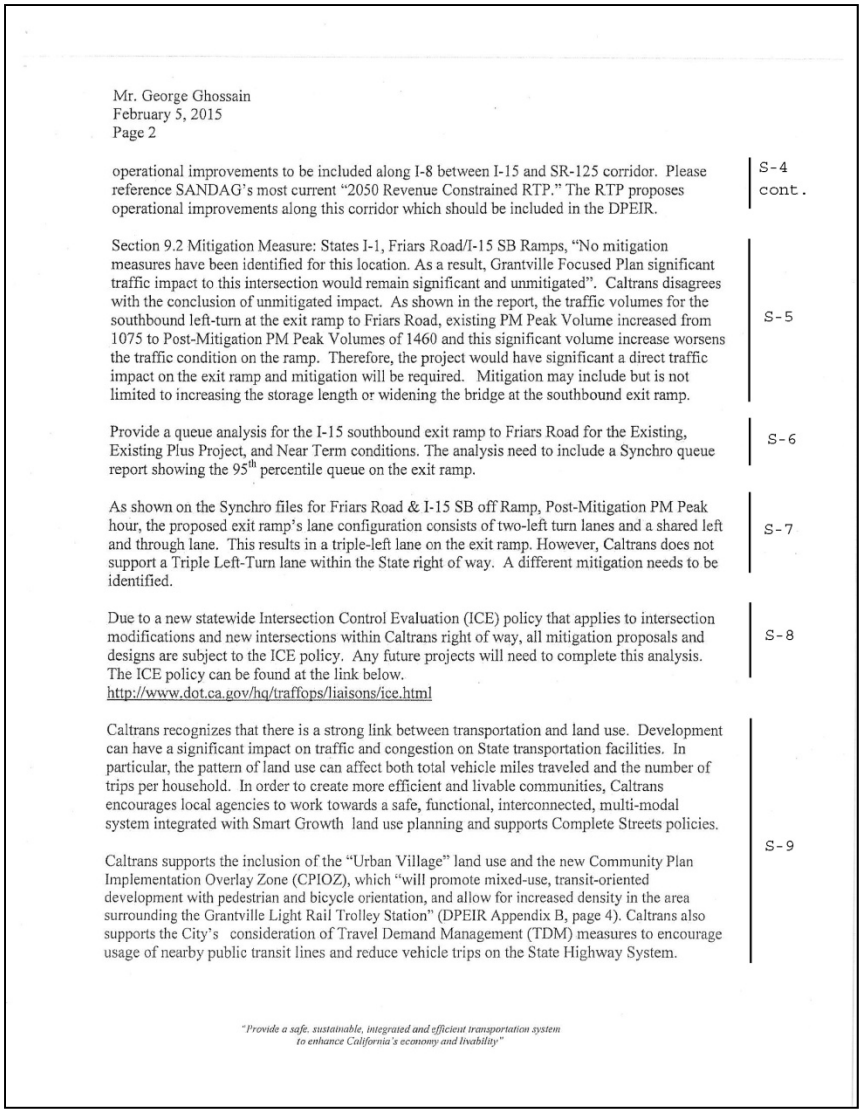
5.2.4.3 Mitigation Framework-Mainline Freeways Segment Mitigation Measures, T-31 thru T-34: Notes that the "SANDAG 2020 Revenue Constraint RTP" in this section proposes S-4

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

S-1: Comment noted

S-2: Table heading will be updated

S-3: Future overall regional growth including Grantville FPA traffic will affect this freeway segment. SANDAG 2050 Revenue Constrained RTP includes operational improvements along I-8 between I-15 and SR-125. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project. Therefore, impact to this segment will remain significant since it's not fully mitigated.



Mr. George Ghossain
February 5, 2015
Page 2

operational improvements to be included along I-8 between I-15 and SR-125 corridor. Please reference SANDAG's most current "2050 Revenue Constrained RTP." The RTP proposes operational improvements along this corridor which should be included in the DPEIR. S-4 cont.

Section 9.2 Mitigation Measure: States I-1, Friars Road/I-15 SB Ramps, "No mitigation measures have been identified for this location. As a result, Grantville Focused Plan significant traffic impact to this intersection would remain significant and unmitigated". Caltrans disagrees with the conclusion of unmitigated impact. As shown in the report, the traffic volumes for the southbound left-turn at the exit ramp to Friars Road, existing PM Peak Volume increased from 1075 to Post-Mitigation PM Peak Volumes of 1460 and this significant volume increase worsens the traffic condition on the ramp. Therefore, the project would have significant a direct traffic impact on the exit ramp and mitigation will be required. Mitigation may include but is not limited to increasing the storage length or widening the bridge at the southbound exit ramp. S-5

Provide a queue analysis for the I-15 southbound exit ramp to Friars Road for the Existing, Existing Plus Project, and Near Term conditions. The analysis need to include a Synchro queue report showing the 95th percentile queue on the exit ramp. S-6

As shown on the Synchro files for Friars Road & I-15 SB off Ramp, Post-Mitigation PM Peak hour, the proposed exit ramp's lane configuration consists of two-left turn lanes and a shared left and through lane. This results in a triple-left lane on the exit ramp. However, Caltrans does not support a Triple Left-Turn lane within the State right of way. A different mitigation needs to be identified. S-7

Due to a new statewide Intersection Control Evaluation (ICE) policy that applies to intersection modifications and new intersections within Caltrans right of way, all mitigation proposals and designs are subject to the ICE policy. Any future projects will need to complete this analysis. The ICE policy can be found at the link below.
http://www.dot.ca.gov/hq/traffops/liaisons/ice.html S-8

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 per household. In order to create more efficient and livable communities, Caltrans encourages local agencies to work towards a safe, functional, interconnected, multi-modal system integrated with Smart Growth land use planning and supports Complete Streets policies.

Caltrans supports the inclusion of the "Urban Village" land use and the new Community Plan Implementation Overlay Zone (CPIOZ), which "will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation, and allow for increased density in the area surrounding the Grantville Light Rail Trolley Station" (DPEIR Appendix B, page 4). Caltrans also supports the City's consideration of Travel Demand Management (TDM) measures to encourage usage of nearby public transit lines and reduce vehicle trips on the State Highway System. S-9

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

S-4: Information will be updated for consistency with RTP 2050

S-5: Caltrans is in the process of developing preliminary improvement plans at I-15 and Friars Road for this location which will be shared with City staff once available. Project description will be included in the findings once available.

S-6: Refer to S-5

S-7: Refer to S-5

S-8: Comment noted.

S-9: Comment noted.

Caltrans appreciates the continued coordination with City staff on this plan, including in the aforementioned I-8 Corridor Study. If you have any questions, please contact Roy Abboud, at (619) 688-6968 or roy.abboud@dot.ca.gov.

Sincerely,

JACOB ARMSTRONG, Chief
Development Review Branch

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

Grantville Focused Plan Amendment
Final Programmatic Environmental Impact Report

Executive Summary

May 2015

EXECUTIVE SUMMARY

ES.1 Project Description

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

The proposed FPA was developed through a series of design charrettes and several years of monthly stakeholder meetings in the Navajo community. Initially, the Grantville area, referred to as Subarea A, was one of several subareas within the Navajo community considered for a land use plan amendment. Through the charrette process and extensive public meetings, several alternative land use scenarios were developed. Ultimately, the City of San Diego decided to focus specifically on a smaller area within the Subarea A (hereby referred to as the proposed FPA area), and the Grantville Stakeholders Committee recommended Alternative D as the preferred land use scenario to be analyzed for the proposed FPA.

The proposed FPA involves rezoning within the FPA area from predominately single-use industrial and commercial zones to mixed-use commercial and residential zones, which promote TOD. It is estimated that the floor area of commercial office land uses would increase by 536,200 square feet (sf), whereas strip commercial uses would decrease by 147,900 sf, resulting in a net increase of 388,300 sf of commercial land uses overall. Industrial development would be reduced from 1,393,500 sf to a new total of 250,000 sf. Residential dwelling units (DU) would increase from 101 up to a total of 8,376.

The proposed FPA would be implemented through the ~~adoption of four new Community Commercial (CC) zones (CC-2-5, CC-3-6, CC-3-8, and CC-3-9)~~rezone of approximately 227 acres. The application of these zones, together with the adoption of a Community Plan Implementation Overlay Zone (CPIOZ), will serve as the implementation tools to achieve the proposed land use amendments associated with the proposed FPA. The proposed CPIOZ will promote mixed-use, TOD with pedestrian and bicycle orientation, and allow for increased density of up to 109 dwelling-units per acre, ~~for a maximum total of approximately 4,594 dwelling units~~, in the area surrounding the existing Grantville Trolley Station, when certain criteria are met.

The list of criteria will be included in the text of the Navajo Community Plan as a focused amendment to the plan.

ES.2 Project Location and Setting

The proposed FPA area is located in San Diego County, in the City of San Diego. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles. The proposed FPA area is an approximately 280-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road, and Mission Gorge Road to Zion Avenue.

The City of San Diego has adopted community plans that provide land use development guidelines for property within each community. The proposed FPA area is located within the Navajo Community Planning Area. All future development activities within the proposed FPA would be required to comply with the Navajo Community Plan, Community Plan Amendment, and the City's Land Development Code.

ES.3 Project Objectives

In accordance with CEQA Guidelines Section 15124, this document identifies the following primary objectives that support the purpose of the project, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in the PEIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary.

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

ES.4 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table ES-1, located at the end of this section, summarizes the results of the environmental analysis completed for each issue area for the proposed FPA. Table ES-1 also includes mitigation measures to reduce and/or avoid the significant environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance. The mitigation measures listed in Table ES-1 are also discussed accordingly within each environmental issue area.

Based on the analysis and conclusions of the PEIR, implementation of the proposed FPA would result in significant and unavoidable impacts to the following issue areas: land use (related to noise), transportation/circulation, air quality, and noise (operational). In addition, the proposed FPA would result in potentially significant but mitigable impacts to the following issue areas: noise (construction), biological resources, hydrology/water quality, historical resources (built environment and archaeological), geologic conditions, paleontological resources, health and safety, and public utilities (solid waste). The proposed FPA's impacts for all other issue areas were determined to be less than significant or no impact was identified.

ES.5 Areas of Controversy

Section 15123(b)(2) of the State CEQA Guidelines requires that areas of controversy known to the Lead Agency, including issues raised by agencies and the public, be identified in the Executive Summary chapter of the PEIR. To determine the number, scope and extent of the environmental topics to be addressed in this Draft PEIR, the City prepared a Notice of Preparation (NOP) and circulated the NOP to interested public agencies, organizations, community groups and individuals in order to receive input on the proposed FPA. The NOP was distributed on November 5, 2013 for a 30-day public review and comment period, and a public scoping meeting was held on November 19, 2013. Public comments received on the NOP and comments from the scoping meeting reflect controversy related to several environmental issues to be discussed in the PEIR.

Issues raised in response to the NOP prepared and circulated for this Draft PEIR focus around land use, transportation/circulation, historical/cultural resources, and biological resource adjacency issues. Transportation/circulation issues were raised through written comments from the California Department of Transportation (Caltrans) and historical/cultural resource issues were raised through written comments from the San Diego County Archaeological Society, Inc. and the Native American Heritage Commission. In addition to written comments received, the City of San Diego held a public scoping meeting where verbal comments were provided in regard to land use, transportation/circulation and biological resource issues.

ES.6 Issues to be Resolved by the Decision-Making Body

The issues to be resolved by the decision-making body (in this case the City) are those of if and how to mitigate the direct significant impacts created by implementation of the proposed FPA. The City would decide if the significant unmitigable impacts can be reduced and if the significant impacts associated with any of the following environmental issues analyzed in the PEIR have been fully mitigated below a level of significance:

- Land Use
- Transportation/Circulation
- Air Quality and Odor
- Greenhouse Gas Emissions
- Noise
- Biological Resources
- Hydrology
- Water Quality
- Historical Resources
- Visual Effects/Neighborhood Character
- Geologic Conditions
- Paleontological Resources
- Health and Safety
- Public Services and Facilities
- Public Utilities

The City would also decide if the proposed FPA conforms to the applicable land use policies, such as those in the General Plan, and if deviations from these policies are justified and acceptable. Lastly, the City would review the alternatives analyzed within the PEIR to determine whether the proposed FPA or an alternative might meet the key objectives of the project while reducing its environmental impact.

ES.7 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 CEQA Guidelines requires the discussion of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" even if the alternatives would impede the attainment of the project objectives to some degree. As discussed in Section 10.0, *Alternatives*, of this PEIR, the following alternatives were considered.

ES.7.1 No Project Alternative (Adopted Community Plan)

The No Project Alternative (Adopted Community Plan) would allow development to proceed in accordance with the existing adopted Navajo Community Plan (City of San Diego,1982). The adopted plan has eleven elements that establish specific land use, transportation, and environmental quality proposals, together with an evaluation of the social and economic impacts resulting from those proposals. Recommendations are included in each element to provide the framework for development.

Compared to the proposed FPA, the No Project Alternative would not avoid or substantially reduce the significant effects of the project with respect to transportation/circulation, air quality, or noise. The No Project Alternative would not meet a substantial portion of the proposed FPA's objectives identified in Chapter 1.0 of this PEIR. Specifically, it would not accomplish, the smart growth principles through the provision of high-density and affordable residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services. In addition, the No Project Alternative would not address the co-location of incompatible uses associated with heavy industrial uses near sensitive receptors. Selection of this alternative would allow industrial uses throughout the community, but at a cost to the community character and potential health of residents where incompatible uses are allowed to coexist. The No Project Alternative would not result in programs or processes that could incentivize development in the TOD area, such as the ministerial review and streamlined permitting. Finally, this alternative would not support a multi-modal transportation strategy.

ES.7.2 Reduced Density Alternative (<43 dwelling units/acre)

The Reduced Density Alternative (<43 du/acre) would reduce the density and intensity of development as compared to the proposed FPA by more than 60 percent. The distribution of land use would otherwise be consistent with the proposed FPA. This alternative would reduce project impacts associated with the intensity of uses.

The Reduced Density Alternative (<43 du/acre) would not result in additional significant impacts beyond those previously identified for the FPA. Impacts to Transportation/Circulation, Air Quality, and Noise, would be incrementally less with the reduction in overall density of development. However, the Reduced Density Alternative (<43 dwelling units/acre) would not meet all of the proposed FPA's objectives. Fewer residential units would also reduce the number of new dwelling units available in the community. The City of San Diego's Regional Housing Needs Allocation calls for the City to develop 88,096 housing units by the year

2020. This alternative would reduce potential housing development in the proposed FPA area by 37%, forcing the city to find other areas to accommodate more housing.

ES.7.3 Reduced Density Alternative (<73 dwelling units/acre)

The Reduced Density Alternative (<73 du/acre) would reduce the density and intensity of development compared to the proposed FPA by more than 30 percent. The distribution of land uses would otherwise be consistent with the proposed FPA. This alternative would slightly reduce project impacts associated with the intensity of uses, and any corresponding significant impacts that would result.

The Reduced Density Alternative (<73 du/acre) would not result in additional significant impacts beyond those previously disclosed for the FPA. Impacts to Transportation/Circulation, Air Quality, and Noise, would be incrementally less with the reduction in overall density of development, see Table 10-1. However, The Reduced Density Alternative (<73 du/acre) would not meet all of the proposed FPA's objectives. Incrementally fewer residential units would reduce the number of new dwelling units available in the community. The City of San Diego's Regional Housing Needs Allocation calls for the City to develop 88,096 housing units by the year 2020. This alternative would reduce potential housing development in the proposed FPA area by 11%, forcing the city to find other areas to accommodate more housing.

ES.7.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify the environmentally superior alternative based on an evaluation of the Plan and its alternatives. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives.

The Reduced Density (<43 du/acre) Alternative is identified as the Environmentally Superior Alternative, as it would reduce the proposed FPA's density and intensity by more than 60 percent. This alternative would reduce the number of residential units by 3,038 units, and the amount of commercial use would be reduced by an estimated 41.01 acres, as compared to the proposed FPA. This reduction could result in smaller-scale, residential and commercial projects with less density. The reduced intensity under this alternative would also be expected to result in proportionate reductions in traffic and construction activity within the community by approximately 60.8 percent compared to the proposed FPA, thereby resulting in a reduction in impacts to community intersections, road segments, and parking supply. However, similar to the proposed FPA, transportation/circulation impacts under the Reduced Density (<43 du/acre) Alternative would still be significant and unavoidable.

In addition, impacts associated with land use (noise), transportation/circulation, air quality, and noise (operational), would be incrementally less with the reduction in overall density of development but would not be reduced to below a level of significance and impacts would remain significant and unavoidable. Impacts for all other issue areas would be similar to the proposed FPA. While the Reduced Density (<43 du/acre) Alternative would be the Environmentally Superior Alternative, this alternative would not meet all of the proposed FPA's objectives. Fewer residential units would also reduce the number of new dwelling

units available in the community, thereby not fulfilling the project objective to produce an additional 3,038 residential units in the Navajo community as compared to the proposed FPA.

The City of San Diego 2008 General Plan set goals for developing compact, mixed-use, walkable communities. The City is also attempting to meet its Regional Housing Needs Allocation, which calls for the city to construct a significant number of housing units by 2020. Grantville's location provides an opportunity to develop a high quality community that can meet those goals. While the Reduced Density (<43 du/acre) Alternative may be environmentally superior, its reduction in overall density does not allow the City to maximize the potential development for the site. Only the proposed FPA would meet the City's General Plan goals and create a walkable community with access to the San Diego River, the Grantville Trolley Station, and other amenities in the area.

Table ES-1: Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Mitigation Measures	Significance After Mitigation
Section 5.1 Land Use		
Build-out under the proposed FPA could potentially result in the exposure of noise-sensitive land uses to future operational noise levels that exceed those established in the Noise Element of the General Plan or SDMC.	Refer to Mitigation Measure N-6 below.	Significant and Unmitigated.
Future development projects associated with implementation of the proposed FPA have the potential to result in significant direct and indirect impacts to City MHPA lands.	~~**LU-1** Future development project policies shall include a requirement to make use of project designs, engineering, and construction practices that avoid and minimize impacts to sensitive habitats and wildlife corridor/MHPA preserve areas.~~ ~~**LU-2** Further environmental review shall be conducted in compliance with the most recent versions of all applicable local, state, and federal regulations where specific actions would result in impacts to sensitive habitats and/or wildlife corridor/MHPA preserve areas. These reviews shall be conducted at the earliest possible period of tiered project review to ensure the most flexibility in planning and project design, and resolve conflicts with significant biological resources.~~ **LU-1** All future specific actions undertaken at or near the San Diego River or adjacent to the MHPA shall be reviewed for consistency with the MSCP preserve and development requirements, as well as the MHPA Land Use Adjacency Guidelines.	Less Than Significant
Section 5.2 Transportation/Circulation (*Year 2030 + Project Conditions)*		
Implementation of the proposed FPA has the potential to result in significant cumulative impacts to the following intersection operations: • Friars Road/Riverdale Street (LOS F during the AM and PM peak hours); • Mission Gorge Road/Zion Avenue (LOS F during the AM and PM peak hours);	**T-1** **Friars Road / Riverdale Street** Restripe northbound and southbound approaches to provide one left-turn lane, one through lane, and one right-turn lane. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T22).	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
• Mission Gorge Road/Princess View Drive (LOS F during the AM peak hour); • Waring Road/Princess View Drive (LOS F during the AM peak hour); • Waring Road/Zion Avenue (LOS F during the AM peak hour or LOS E during the PM peak hour); • Fairmount Avenue/Mission Gorge Road (LOS F during the AM and PM peak hours); • Fairmount Avenue/Alvarado Road/Camino Del Rio N. (LOS F during the AM and PM peak hours); and, • Alvarado Canyon Road/Mission Gorge Place (LOS F during the AM and PM peak hours).	**T-2** **Mission Gorge Road / Zion Avenue** Restripe westbound approach to provide dual left-turn lanes and a through/right-turn lane. Restripe eastbound approach to provide a dedicated right-turn lane. Also, remove the east-west split phase to provide protected left-turn phases. Even with the mitigation measures identified above, the FPA significant traffic impact to this intersection would be significant and unavoidable. ~~The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures.~~ This proposed intersection improvement project is identified in the Navajo PFFP (#T23). **T-3** **Mission Gorge Road / Princess View Drive** Restripe southbound approach to provide a dedicated left-turn lane and a shared right-turn/through lane. Also, remove the split phase and provided protected left-turn phases. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T24). **T-4** **Waring Road / Princess View Drive** Restripe westbound approach to provide a dedicated right-turn lane. Prohibit street parking along the westbound approach. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T25). **T-5** **Waring Road / Zion Avenue** Restripe southbound approach to provide a dedicated right-turn lane. Prohibit street parking along the southbound approach. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T26).	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
	T-6 **Fairmount Avenue / Mission Gorge Road** Widen the northbound approach to provide an additional (third) through lane. Provide a northbound right-turn overlap phase. Widen the southbound approach to provide three through lanes and a dedicated right-turn lane. Widen the eastbound approach to provide one left-turn lane, one through lane, and two right-turn lanes with overlap phasing. Remove the east-west split phase to provide protected left-turn phases. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. The Alvarado Canyon Road Realignment Project proposed at this location is identified in the Navajo PFFP (#T12). **T-7** **Alvarado Canyon Road / Mission Gorge Place** Install a traffic signal at this intersection once ~~it is warranted~~warrant analysis is complete. Widen the westbound approach to provide an exclusive right-turn lane. Widen the eastbound approach to provide a dedicated left-turn lane. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T27).	Significant and Unmitigated
Implementation of the proposed FPA has the potential to result in significant cumulative impacts to street segment operations at the following segments: • Friars Road: I-15 NB Ramps to Rancho Mission Road (LOS F); • Friars Road: Rancho Mission Road to Santo Road (LOS F); • Friars Road: Santo Road to Riverdale Street (LOS F); • Mission Gorge Road: Mission Gorge Place to Fairmount Avenue (LOS E); • Mission Gorge Road: Rainier Avenue to Vandever Avenue (LOS E); • Mission Gorge Road: Vandever Avenue to	**T-8** **Friars Road from I-15 NB Ramps to Rancho Mission Road** Widen the roadway to 8-Lane Prime Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable.~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure~~. This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Even if the Mission Valley PFFP were amended and the Mission Valley Community Plan were updated, until the Mission Valley PFFP is fully funded, the traffic impact to this roadway segment would be significant and unmitigated. ~~Therefore, the FPA significant traffic impact to this roadway segment would remain significant unmitigated.~~	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
Twain Avenue (LOS F); • Mission Gorge Road: Twain Avenue to Mission Gorge Place (LOS E); • Fairmount Avenue: Vandever Avenue to Twain Avenue (LOS F): • Fairmount Avenue: Mission Gorge Road to Alvarado Canyon Road (LOS F); • Fairmount Avenue: Alvarado Canyon Road to I-8 WB Ramps (LOS F); • Fairmount Avenue: I-8 WB Ramps to I-8 EB Ramps; • Vandever Avenue: Riverdale Street to Mission Gorge Road (LOS E); • Twain Avenue: Fairmount Avenue to Mission Gorge Road (LOS F); • San Diego Mission Road: Rancho Mission Road to Fairmount Avenue (LOS F); and, • Zion Avenue: Mission Gorge Road to Waring Road (LOS F).	**T-9** **Friars Road from Rancho Mission Road to Santo Road** Widen the roadway to 8-Lane Prime Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Even if the Mission Valley PFFP were amended and the Mission Valley Community Plan were updated, until the Mission Valley PFFP is fully funded, the traffic impact to this roadway segment would be significant and unmitigated. ~~Therefore, the FPA significant traffic impact to this roadway segment would remain significant unmitigated~~. **T-10** **Friars Road: Santo Road to Riverdale Street** This roadway segment is currently built to its ultimate classification per Mission Valley and Navajo Community Plans. No mitigation measures have been identified for this location. The FPA significant traffic impact to this roadway segment would remain significant unmitigated. **T-11** **Mission Gorge Road from Rainier Avenue to Vandever Avenue** Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvement Project is identified in the Navajo PFFP (#T19). **T-12** **Mission Gorge Road from Vandever Avenue to Twain Avenue** Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19). **T-13** **Mission Gorge Road from Twain Avenue to Mission Gorge Place** Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
	T-14 Mission Gorge Road from Mission Gorge Place to Fairmount Avenue Widen the roadway to 6-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T16). **T-15 Fairmount Avenue from Vandever Avenue to Twain Avenue** Provide a continuous two-way left-turn lane. Retain the street parking along both sides of the roadway. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T20). **T-16 Fairmount Avenue from Mission Gorge Road to Alvarado Canyon Road** Widen the roadway to a 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. ~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure~~. The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12). **T-17 Fairmount Avenue from Alvarado Canyon Road to I-8 WB Ramps** Widen the roadway to 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable.~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure~~. The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12). **T-18 Fairmount Avenue from I-8 WB Ramps to I-8 EB Ramps** Widen the roadway to 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable.~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure~~. The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
	T-19 Vandever Avenue from Riverdale Street to Mission Gorge Road Restripe to provide a continuous two-way left-turn lane. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T28). **T-20 Twain Avenue from Fairmount Avenue to Mission Gorge Road** Restripe to provide a continuous two-way left-turn lane. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T29). **T-21 San Diego Mission Road from Rancho Mission Road to Fairmount Avenue** Widen the roadway to 4-Lane Collector Street would mitigate the FPA significant impact to San Diego Mission Road. However, widening of this roadway to 4-Lane Collector would require bridge widening over the San Diego River~~. which is not included in any Public Facilities Financing Plan or funded Capital Improvement Program. Development project review would address significance of impacts on a project level basis~~. The widening of this roadway would impact the San Diego River, wetlands, biological resources, and may conflict with the San Diego River Park Master Plan. Therefore, widening of the San Diego Mission Road and bridge widening are not recommended. Therefore, the FPA significant traffic impact to this roadway segment would remain significant and unmitigated. **T-22 Zion Avenue from Mission Gorge Road to Waring Road** Widen the roadway to 4-Lane Major Street would mitigate The FPA significant impact to Zion Avenue. Widening of this roadway would impact surrounding residential properties, community character and on-street parking that is heavily utilized in this area. Therefore widening of this roadway segment is not recommended and the FPA significant traffic impact to this roadway segment would remain significant and unmitigated.	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
Implementation of the proposed FPA would increase density and ultimately result in a significant increase in traffic within the proposed FPA area.	**T-23 Pedestrian Circulation Improvements** • Provide minimum 5 foot non-contiguous sidewalks on both sides of any vehicular access way (including private drives that a project creates on its property). Vehicular access ways shall connect to existing alleys, streets and adjacent development. (SDR 17) • Provide a minimum 5 foot planting zone and minimum 10 foot sidewalk. The planting zone shall be adjacent to the curb and the sidewalk shall be between the planting zone and the building. (SDR 18) • All crosswalks shall meet City standard for high visibility (Continential) crosswalks (See Standard Drawing SDM-116). All transverse type crosswalks within the public right-of-way shall be upgraded to new City standard crosswalks per City Adoption of High Visilbity Crosswalks. Additionally, the Navajo Community Plan Grantville - CPIOZ Section includes an SDR for use of enhanced pavement pattern. Median refuge, curb extensions, countdown signals etc. shall be included per City standards and Street Design Manual. • Development shall provide a minimum of one pedestrian (and bicycle) connection to each adjacent property. These pedestrian (and bicycle) connections shall be coordinated and connected. Fencing or walls that limit access are prohibited (SDR 21) beyond security considerations. • Pedestrian connectivity to the San Diego River, the surrounding parks and transit shall be provided per the San Diego River Park Master Plan. • Provide direct access to Alvarado Creek from common areas and ground floor units. (SDR 38) and development along Alvarado Creek shall provide a 10 foot wide pedestrian and bicycle trail adjacent to the Alvarado Creek. (SDR 29)	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	• Provide a bridge at Mission Gorge/Fairmount Ave for the Alvarado Creek to connect to the San Diego River. Provide a pedestrian connection with the bridge for access to the River and Creek (San Diego River Park Master Plan). • Primary access for each ground-floor commercial, office, retail, and residential unit/space shall be provided directly from the public right-of-way, public street, and/or internal street (SDR 6). All sidewalks, crosswalks and access to the entrances shall be ADA compliant. A straight, accessible path of travel shall be maintained clear without any obstructions (SDR 19). ~~• Provide sidewalks, landscaping and pedestrian supportive lighting on all new and major streets.~~ ~~• All major crosswalks should be marked and enhanced crosswalk improvements such as pavement pattern, median refuge, curb extensions, countdown signals etc. should be considered.~~ ~~• Adequate pedestrian connectivity/access between various land uses should be provided. Provide pedestrian crossing on Friars Road at the Mission Gorge Road intersection.~~ ~~• Pedestrian connectivity to the San Diego River, the surrounding parks and the transit should be emphasized.~~ ~~• All sidewalks, crosswalks and access to the entrances should be ADA compliant.~~ ~~• The pedestrian improvements should be consistent with the goals included in the City of San Diego Pedestrian Master Plan.~~ **T-24 Bicycle Circulation Improvements** • Per the City of San Diego River Park Master Plan, provide the following: o Provide for a San Diego River Pathway connection to San Diego Mission Road from the north side of the river at Rancho Mission Road.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	o Provide a bridge at Mission Gorge/Fairmount Ave for the Alvarado Creek to connect to the San Diego River. Provide a bicycle connection with the bridge for access to the River and Creek (San Diego River Park Master Plan). Enhanced bike lanes and crossings shall be provided between the proposed San Diego River bike path and the existing Fairmount Avenue bike path. o Identify land for bicycle (and pedestrian) trail through land acquisition or open space easements and identify an alignment for the San Diego River Pathway as Grantville redevelops. o Development shall provide a minimum of one bicycle connection (and pedestrian) to each adjacent property. These bicycle connections shall be coordinated and connected. Fencing or walls that limit access are prohibited. (SDR 21) o Project shall be provided per City standard. Bike racks must be provided along the project's street frontage. (SDR 22) ~~• Enhanced bike lanes and crossings should be provided between the proposed San Diego River bike path and the existing Fairmount Avenue bike path.~~ ~~• Improve the bike trail crosswalk at the Mission Gorge Road/Camino del Rio North intersection.~~ ~~• Bicycle connectivity to the San Diego River, the surrounding parks and transit should be emphasized.~~ ~~• Provide sufficient bicycle parking (lockers and U loops).~~ • Per SANDAG's San Diego Regional Bicycle Plan, provide a Class I Bike Path along the San Diego River Bikeway Corridor.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	• Per the Navajo PFFP, provide the following: o Complete the Mission Trails Bike Path Study (#T13) o Construct bicycle routes throughout the community (#T14) • Per the City of San Diego Bicycle Master Plan, provide the following: o Class II Bike Lane along Friars Road from I-15 SB Ramps to Mission Gorge Road o Class II Bike Lane along Mission Gorge Road from Jackson Drive to Friars Road o Class II Bike Lane along Mission Gorge Road from Friars Road to I-8/Fairmount Avenue interchange o Class II Bike Lane ~~Class III Bike Route~~ along Zion Avenue from Mission Gorge Road to Waring Avenue o Class II Bike Lane along San Diego Mission Road from Rancho Mission Road to Twain Avenue o Class II Bike Lane along Camino Del Rio North from east of Ward Street to Fairmount Avenue o Class II Bike Lane along Mission Gorge Place from Alvarado Canyon Road to Fairmount Avenue. Furthermore, the bicycle network improvements within the study area identified in the City of San Diego Bicycle Master Plan, SANDAG's San Diego Regional Bicycle Plan, and the Navajo Facilities Financing Plan should be implemented. **T-25 Transit Improvements** • Per the Navajo Community Plan Amendment, provide the following: o All new projects shall provide wayfinding signage that identifies pedestrian and bicycle routes to and from the Grantville Trolley Station. (SDR 15) ~~• All streets, which are directly served by transit should be designed or retrofitted to serve pedestrians since there must be adequate facilities to~~	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	~~access transit. Provide sufficient ADA compliant pedestrian access to all mass transit facilities.~~ • ~~Bus Shelters should be provided at all bus stop locations in the FPA area.~~ • ~~Transit Priority Signals should be installed on all Mission Gorge Road Signals (from Friars Road to Camino del Rio North).~~ • ~~Based on the future ridership, increasing the bus frequency during peak periods should be considered. Bus stops should be considered within ¼ mile radius for every land use in the FPA area and bus routes should be reevaluated based on the proposed land uses.~~ **T-26 Transportation Demand Management (TDM) Improvements** • Per Chapter 14 Article 2 Division 5 §142.0540 (c), provide the following: o The TDM Plan shall be designed to reduce peak period automobile use with such techniques as carpooling, vanpooling, transit, bicycling, walking, telecommuting, compressed work weeks, or flextime. o Transit pass or transit discounts shall be incorporated into TDM Plans and Programs. ~~should be considered~~. o Intelligent Transportation System components shall be incorporated when possible with SANDAG ITS Program. • ~~TDM principals such as peak hour trip reduction, staggered work hours, ride sharing, telecommunication and promoting the usage of transit should be considered and promoted.~~ • ~~Intelligent Transportation System components should be utilized as appropriate.~~ ~~Transit for individual projects should be considered.~~ • Transit service time (priority signalizing) and transit only lanes shall be incorporated as part of traffic improvements. ~~should be considered~~.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Implementation of the proposed FPA has the potential to result in significant cumulative impacts to freeway ramp meter operations at the Friars Road to Northbound I-15 freeway ramp. In addition, implementation of the proposed FPA has the potential to result in significant cumulative impacts to freeway segment operations at the following freeway segments: • I-15 NB: Aero Drive to Friars Road • I-15 SB: Aero Drive to Friars Road • I-15NB: Friars Road to I-8 • I-15 SB: Friars Road to I-8 • I-8 EB: I-15 to Fairmount Avenue • I-8 WB: I-15 to Fairmount Avenue • I-8 EB: Fairmount Avenue to Waring Road • I-8 WB: Fairmount Avenue to Waring Road	**T-27 thru T-30: I-15 NB & SB: Aero Drive to I-8** San Diego Association of Governments (SANDAG) 2040 Revenue Constrained Regional Transportation Plan (RTP) proposes the construction of 2 managed lanes along I-15 between I-8 and SR-163. Project is expected to be built by Year 2020. This measure provides partial mitigation since it reduces the traffic demand on the freeway general purpose lane; however, even with this improvement, the FPA traffic impact to this roadway segment is significant. **T-31 thru T-34: I-8 EB & WB: I-15 to Waring Road** SANDAG 2020 Revenue Constraint RTP includes operational improvements along I-8 between I-15 and SR-125. Project is expected to be built by Year 2040. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project; however, even with this improvement, the FPA traffic impact to this roadway segment is significant. **T-35: Friars Road to Northbound I-15 Ramp** No mitigation measures have been identified for this location. Mitigation measures that would potentially reduce vehicular queuing and freeway ramp metering impacts at this location consists of adding freeway lanes, auxiliary lanes, adding a lane to the freeway on-ramp, implementation of TDM measures that encourage carpooling and other alternate means of transportation or a combination of these measures. Additional roadway improvements would also be necessary along Friars Road; however, this interchange is located within the Mission Valley Community Plan, and will be evaluated in more detail in the upcoming Mission Valley Community Plan Update. As a result, the FPA significant traffic impact to this intersection would remain significant and unmitigated.	Significant and Unmitigated

Environmental Impact	Mitigation Measures	Significance After Mitigation
	T-36: Friars Road / I-15 SB Off-Ramps Intersection Caltrans is in the process of developing preliminary improvement plans for this location which will be shared with City staff once available. ~~No mitigation measures have been identified for this location. Additional through lanes along Friars Road would be needed to improve the traffic operations at this intersection to pre-project conditions or better which would require bridge widening. The existing bridge at this interchange is currently built to its ultimate classification per Mission Valley Community Plan.~~ It should be noted that this location is located within the Mission Valley Community Planning area where it will be evaluated in more detail in the upcoming Mission Valley Community Plan update. As a result, the FPA significant traffic impact to this intersection would remain significant and unmitigated. **T-37 Fairmount Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio N. Intersection** I-8/Fairmount Avenue interchange improvement project is included in the Navajo PFFP (# T12). This measure provides partial mitigation since it improves freeway and local roadway operation in the vicinity of the project; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.	Significant and Unmitigated
Section 5.3 Air Quality and Odor		
Short-term and long-term emissions associated with future project-specific developments within the proposed FPA area have the potential to result in a cumulatively considerable net increase in air pollutant emissions.	**AQ-1** For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include: • Minimizing simultaneous operation of multiple pieces of construction equipment; • Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated equipment; • Use of alternative fueled construction equipment; • Dust control measures for construction sites to minimize fugitive dust, e.g. watering, soil stabilizers, and speed limits; • Minimizing idling time by construction vehicles.	Significant and Unmitigated

Environmental Impact	Mitigation Measures		Significance After Mitigation
	AQ-2	Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with feasible ~~all reasonable~~ mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.	Significant and Unmitigated
Section 5.5 Noise			
Future development activities associated with implementation of the proposed FPA have the potential to result in significant temporary noise impacts associated with demolition and construction of individual projects.	**N-1**	**Project Specific Noise Study**. A noise survey shall be conducted to determine construction and operation impacts and identify methods that can be implemented to meet applicable noise standards. The noise survey shall be sufficient to indicate existing and projected noise levels to determine the amount of attenuation needed to reduce potential noise impacts to meet interior noise standards. See the Grantville CPIOZ section – Navajo Community Plan for supplemental design regulations.	Less Than Significant
Future development activities associated with implementation of the proposed FPA have the potential to result in significant operational noise impacts.			Significant and Unmitigated
Future development activities associated with implementation of the proposed FPA have the potential to result in significant temporary noise impacts associated with demolition and construction of individual projects.	**N-2**	**Construction Equipment**. Electrical power shall be used to run air compressors and similar power tools. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded with temporary noise barriers, such as barriers that meet a sound transmission class (STC) rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Future development activities associated with implementation of the proposed FPA have the potential to result in significant temporary noise impacts associated with demolition and construction of individual projects.	**N-3** **Limit Operations Adjacent to Receivers**. Limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to receivers to one at any given time.	Less Than Significant
Future development activities associated with implementation of the proposed FPA have the potential to result in significant temporary noise impacts associated with demolition and construction of individual projects.	**N-4** **Neighbor Notification**. As part of applying for construction noise permits, ~~P~~provide notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor/indoor living areas. Notification should include the anticipated hours, duration of construction, a description of noise reduction measures being implemented at the project site, and a telephone number for local residents to call to submit complaints associated with construction noise. (SDMC Section 59.5.0404)	Less Than Significant
Future development activities associated with implementation of the proposed FPA have the potential to result in significant temporary noise impacts associated with demolition and construction of individual projects.	**N-5** **Noise Control Plan.** Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements: • Contractor shall turn off idling equipment. • Contractor shall perform noisier operation during the times least sensitive to receptors. • All diesel equipment shall be operated with closed engine doors and shall be equipped with factory- recommended mufflers. • Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities. • For all noise-generating construction activities, additional noise attenuation techniques shall be employed as necessary to reduce noise levels. Such techniques shall include, but are not limited to, the use of sound blankets, noise shrouds and temporary sound barriers between construction sites and nearby sensitive receptors as specified in the noise control plan.	Less Than Significant

Environmental Impact	Mitigation Measures		Significance After Mitigation
Build-out under the proposed FPA could potentially result in the exposure of noise-sensitive land uses to future operational noise levels that exceed those established in the General Plan or SDMC.	**N-6**	Where new projects expose residences to noise exceeding normally acceptable levels, the City of San Diego shall require the ~~consideration~~ use of various sound attenuation techniques as ~~required by~~prescribed in the California Energy Code Title 24 standards. These standards specify construction methods and materials that result in energy efficient structures and up to a 30 dBA reduction in interior noise levels (assuming that windows are closed). Requirements may include the use of appropriate setbacks and sound attenuating building design, including retrofit of existing structures with sound attenuating building materials where feasible. Such measures may include, but are not limited to dual-paned windows, solid core exterior doors with perimeter weather stripping, air conditioning system so that windows and doors may remain closed and situating exterior doors away from roadways. In instances where use of these techniques is not feasible, the use of sound barriers (earthen berms, sound walls, or some combination of the two) will be considered. Whenever possible, a combination of elements should be used, including solid fences, walls, and landscaped berms. Determination of appropriate noise attenuation measures will be based on a noise study ~~a project's individual environmental review~~ pursuant to City of San Diego regulations. This shall be accomplished during the ~~project's individual environmental review~~ permitting and/or environmental review process.	Significant and Unmitigated
Section 5.6 Biological Resources			
Future project-specific developments located adjacent to or within areas under the jurisdiction of federal, state, or local biological resources regulatory agencies have the potential to result in significant impacts to jurisdictional biological resources.	**BR-1**	To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the FPA area, all subsequent projects within CPIOZ Type B areas shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). DELETED PREVIOUS BR -1~~Prior to any project impacts occurring within areas under the jurisdiction of federal, state, or local biological resource regulatory agencies, the project applicant for the specific work shall obtain any and all applicable~~	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	~~resource agency permits which may include, but are not limited to, Clean Water Act 404 and 401 permits and California Department of Fish and Wildlife Streambed Alteration Agreements.~~	
Future project-specific developments can potentially to result in significant impacts to adjacent Tier I-III habitats.	**BR-2** **Mitigation for Impacts to Sensitive Upland Habitats.** Future projects implemented in accordance with the FPA resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines (see Table 5.6-5) MSCP Subarea Plan. DELETED PREVIOUS BR-2 ~~Significant impacts to City Tier I-III habitats shall be mitigated as shown in Table 5.1-6, Section 5.1 Land Use of this PEIR.~~	Less Than Significant
Future project specific developments can potentially have construction impacts to sensitive species.	**BR-3** **Mitigation for Short-term Impacts to Sensitive Species from Project Construction.** Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo, and the cactus wren are further detailed in LU-3 and BR-4. Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the FPA are included in Sections 5.1.6 (Land Use) and 5.6.3 (Biological Resources). Please refer to Mitigation Framework BR-1 through BR-5 and LU-1 (MHPA Land Use Adjacency Guidelines). DELETED PREVIOUS BR-3~~Any significant wetland/waters of the U.S. resource impacts to the San Diego River or other such features located in the planning area identified during the site specific environmental review shall be mitigated within the immediate area of the impact action where feasible.~~	Less Than Significant
Future project-specific developments located adjacent to the San Diego River and Alvarado Creek have the potential to result in significant wetland resource impacts.	**BR-4** To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the FPA shall be required to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats. DELETE PREVIOUS BR-4 ~~Where potential impacts to non-MSCP covered federal and/or state listed sensitive~~	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	~~species and/or narrow endemic species may occur as a result of future development actions, coordination with responsible listing agencies (USFWS and/or CDFW) shall commence as early as practicable and in conjunction with, or prior to, the CEQA process for actions that may affect these species. Specific actions necessary to protect these sensitive species shall be determined on a case by case basis.~~	
Future project-specific developments within the proposed FPA area have the potential to result in significant impacts to federal and/or state listed sensitive species. Future project-specific developments have the potential to result in significant impacts to adjacent nesting bird habitats and nesting birds.	**BR-5** **Mitigation for Migratory Wildlife.** Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the FPA area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in BR-1 during the subsequent development review process. The Biology Report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor. DELETED PREVIOUS BR-5. ~~Project actions resulting in impacts to nesting migratory birds (as defined under the Migratory Bird Treaty Act [MBTA]) shall incorporate seasonal timing constraints for any wetland habitat clearing or shall require work corridor surveys for nesting birds. Where active nests are identified, these shall be avoided if practical, and if necessary, a MBTA Special Purpose Permit (50 CFR §21.27) shall be completed before removal of active nests of MBTA covered species.~~	Less Than Significant
~~Future project-specific developments have the potential to result in significant impacts to adjacent nesting bird habitats and nesting birds.~~	**Previous BR-6 has been deleted.** ~~**BR-6** Impacts on nesting birds shall be avoided in compliance with California Fish and Game Code (§3503) under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs.~~	~~Less Than Significant~~

Environmental Impact	Mitigation Measures	Significance After Mitigation
Section 5.7 Hydrology / Section 5.8 Water Quality		
Implementation of the proposed FPA is expected to result in an increase in runoff volumes and peak flow rates for certain drainage basins which outlet into wetland vegetation communities located within the San Diego River and Alvarado Creek.	**HYD-1:** All future project-specific developments shall be reviewed by City staff for potential runoff volumes and peak flow rate impacts (see City of San Diego Water Management and Disclosure Ordinance). If City Staff determines that a future project specific development would potentially result in runoff impacts, the preparation of a project-specific Hydrology Study and Water Quality Technical Report will be required. The project-specific reports would identify specific mitigation measures such as on-site detention basins or bioretention facilities that would need to be implemented into the design and construction of the project. Storm water improvements and water quality protection measures that shall be required for future projects include: • Increasing onsite filtration; • Preserving, restoring, or incorporating natural drainage systems into site design; • Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas; • Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible; • Increasing the use of vegetation in drainage design; • Maintaining landscape design standards that minimize the use of pesticides and herbicides; and • To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss. To accommodate vector control, any measure used to control runoff or protect water quality shall ensure that it does not result in 0.5-inch or more of standing water for more than 96 hours.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Section 5.9 Historical Resources		
Implementation of the proposed FPA would facilitate future development that has the potential to result in significant direct and/or indirect impacts to the five structures recommended as potentially eligible historic resources in the City Register or CRHR.	**HR-1:** Prior to issuance of any permit for a future development project ~~implemented in accordance with the FPA that would directly or indirectly affect a building/structure in excess of 45 years of age~~, the City shall determine whether any structure in excess of 45 years of age has potential historical significance~~the affected building/structure is historically significant~~. All buildings on a parcel shall be evaluated together. 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 Historic Resources 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: a. Preparing a historic resource management plan; b. Designing 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); c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation; d. 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; e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning; and f. Removing industrial pollution at the source Specific types of historical resource reports, outlined in Section III of the HRG, 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. If required, mitigation programs can also be included in the report.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Implementation of the proposed FPA has the potential to result in significant impacts to unknown archaeological resources located within the proposed FPA area during project-specific construction activities.	**HR-2**: Prior to issuance of any permit that could directly affect an archaeological resource or resources associated with prehistoric Native American activities, 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 that may be impacted by a development activity. ***Initial Determination:*** The environmental analyst shall 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 California Historical Resources Inventory System) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then an evaluation consistent with the City of San Diego's Historical Resources Guidelines shall be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines. ***Step 1:*** Based on the results of the Initial Determination, if there is evidence that the site contains archaeological resources, preparation of an evaluation report is required. The evaluation report could generally include background research, a field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required that 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 Native American Heritage Commission (NAHC) must also be conducted at this time. Information about existing archaeological collections shall also be obtained from the San Diego Archaeological Center and any tribal repositories or museums. Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. 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	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Section 5.9 Historical Resources Cont'd	field surveys historical resources are identified, then an evaluation of significance must be performed by a qualified archaeologist. ***Step 2:*** Once a resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors must be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representatives, 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). An archaeological testing program will be required, which includes 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 of San Diego's Historical Resources Guidelines. The results from the testing program will be evaluated against the Significance Thresholds found in the Historical Resources Guidelines and in accordance with the provisions outlined in Section 15064.5 of the State CEQA Guidelines. If significant historical resources are identified within the project's Area of Potential Effect (APE), the site may be eligible for local designation. At this time, 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 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.	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Section 5.9 Historical Resources Cont'd	***Step 3:*** Preferred mitigation for archaeological 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 (RDDRP) is required or is required to follow alternate treatment recommendations by the Most Likely Descendant (MLD), which includes a Collections Management Plan for review and approval. 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. If the archaeological site is an historical resource, then the limits on mitigation provided under CEQA Section 21083.2 shall not apply, and treatment in accordance with CEQA Guidelines Section 15162.4 and 21084.1 is required. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring shall 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 (TCP) or any archaeological site located on City property or within the APE 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 Public Resources Code Section 5097 must be followed. These provisions would be outlined in the MMRP included in the 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 in conformance with the California Office of Historic Preservation (OHP) "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental Analysis Section staff in the review of	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
Section 5.9 Historical Resources Cont'd	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 TCPs 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 that 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 of San Diego. Appendix D (Historical Resources Report Form) shall be used when no archaeological resources were identified within the project boundaries. ***Step 5:*** For all 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. 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., AB 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) 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 must be established between the applicant/property owner and consultant prior to the initiation of the field reconnaissance and must be included in the archaeological survey/testing/data recovery report submitted to the City for approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	May 7, 1993) and, if federal funding is involved, Federal Register 36CFR79. Additional information is provided in Section II-Historical Resources Guidelines.	
Section 5.11 Geologic Conditions		
The FPA area contains geologic conditions that would pose significant risks for future development if not properly addressed at the project-level. Unstable conditions relating to strong seismic shaking, landslides, shallow groundwater, liquefaction, and seismically induced settlement represent a potentially significant impact for future development.	**GC-1:** Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.	Less Than Significant
~~**Section 5.12 Paleontological Resources**~~		
~~Future development activities within the proposed FPA area have the potential to result in the substantial excavation of potential fossil bearing geologic formations with a high paleontological sensitivity, including the Mission Valley Formation, Stadium Conglomerate, and Friars Formation.~~ The FPA area does not have impacted geologic formations with moderate or high paleontological sensitivity.	**PR-1:** ~~Prior to the approval of subsequent development projects implemented in accordance with the CPU, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted under CPIOZ Type B, 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~~ ~~The environmental analyst shall complete a project level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS 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 resource potential geologic deposit/formation/rock unit.~~ • ~~Require over 2,000 cubic yards of excavation and/or a 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.~~	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	~~Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.~~ • ~~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 MMRP shall be implemented during construction grading activities.~~	
Section 5.13 Health and Safety		
Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires.	**HS-1** Future projects are required to incorporate sustainable development and other measures in accordance with the Land Development Code - Landscape Standards which are~~Future projects are implemented in accordance with the CPU shall be required to incorporate sustainable development and other measures into site plans in accordance with the City's Brush Management Regulations, and Landscape Standards pursuant to General Plan and CPU policies~~ 3intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.	Less Than Significant
Future development activities within the proposed FPA area have the potential to be located on a site with potentially contaminated soil and/or groundwater that may have been impacted by releases of hazardous materials or petroleum products from surficial spills, subsurface releases	**HS-2** Property-specific due diligence processes should be conducted by qualified environmental professionals, in accordance with applicable guidelines and regulations, on specific properties within the proposed FPA area prior to property transactions and/or future development. Phase I Environmental Site Assessments (ESAs) should be conducted by qualified environmental professionals in accordance with the standard of care at that time (currently the	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
from USTs, or other sources. Excavation of potentially contaminated soil may expose people to hazardous materials/waste and/or toxic substances.	American Society for Testing and Materials Standard Practice E1527-13) and applicable regulations (currently the EPA 40 Code of Federal Regulations §312 titled "Standards and Practices for All Appropriate Inquiries"). **HS-3** For properties within the proposed FPA area with suspected or documented soil and/or groundwater contamination or other potential environmental concerns, further evaluation, such as Phase II ESAs and/or remediation activities, should be conducted prior to or during future development activities by appropriately certified and/or registered professionals in accordance with a work plan that is approved by the regulatory agency having oversight of the activities. Results of previous assessment activities for a property (e.g., previous Phase II ESAs, UST removal sampling data), if any, should be evaluated by certified and/or registered professionals prior to future development activities. **HS-4** The "case closure" regulatory status should be reevaluated prior to future development activities by a qualified environmental professional in conjunction with the regulatory agency having oversight of the activities for unauthorized release properties when a site use change is part of the planned future development (e.g., from industrial to residential use). **HS-5** For properties with documented or suspected impacts to soil and/or groundwater, appropriate worker and community health and safety measures should be implemented by the contractor, under the oversight of a qualified environmental professional, during soil/groundwater disturbance activities (e.g., dust control, air monitoring, stockpile management). **HS-6** It is possible that contaminated soil and/or groundwater, not identified during the technical study, may be present within the proposed FPA area (e.g., lead in shallow soil, burn pits). For this reason, the following precautions should be observed during excavation activities associated with the improvements conducted during future development: • Pre-project activities (e.g., planning or early design) should include site-specific environmental evaluation to address hazardous materials concerns related to worker and community health and safety, waste generation and disposal, and regulatory requirements. • Caution should be taken during excavation activities near the facilities	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	associated with unauthorized releases, because of the potential for encountering documented and undocumented releases of contaminants and hazardous materials or wastes that may have occurred within or adjacent to these sites. Excavation and/or soil monitoring should be conducted by professionals trained in the identification and management of hazardous materials or wastes, such as contaminated soil or groundwater. • Appropriate references to the potential to encounter contaminated soil or groundwater should be included in construction specifications. • A Site Health and Safety Plan should be prepared and implemented prior to initiation of construction activities within the boundaries of the proposed FPA area to reduce potential health and safety hazards to workers and the public. **HS-7** Soil generated during construction activities for future development (e.g., subsurface excavation, grading) at contaminated properties may require chemical characterization (e.g., analytical testing) by a qualified environmental professional prior to reuse, export, or disposal. **HS-8** Further assessment is recommended to be performed by a qualified environmental professional if discolored soil or other potential environmental issues are encountered in the proposed FPA area during construction/future development activities. If contamination is discovered, regulatory agencies may require additional environmental investigation and/or mitigation to be conducted by the property owner, particularly if there is the potential to affect public health, safety, and/or the environment. **HS-9** Future development of impacted or potentially impacted properties involving soil excavation, grading, or other subsurface disturbance should include implementation of a soil and groundwater management plan to address the possibility of encountering localized areas of potential environmental concern. The plan should be prepared by a qualified environmental consultant and should be implemented during soil/groundwater disturbance activities under the oversight of an environmental professional on behalf of the property owner/developer. The plan should address monitoring of excavated soil, community and worker health and safety, and soil and groundwater handling, stockpiling, characterization, on-site reuse, export, and disposal protocols. Appropriate references to the potential to encounter contaminated soils and/or	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
	groundwater should be included in construction specifications and bid documents so that the contractor can consider various factors (e.g., groundwater pumping rates, soil disposal) in their work. **HS-10** Groundwater at certain locations within the proposed FPA area has been documented as being impacted. Based on evidence of shallow groundwater depths (i.e., as shallow as 9 feet below adjacent ground surface) at some locations, if dewatering activities are planned for construction or other proposed improvements, they may be subject to increased disposal costs or other environmental surcharges (e.g., permitting) as a result of the presence of contaminated groundwater. A discharge permit will likely be required for dewatering, and water may need to be characterized by a qualified environmental consultant and/or treated prior to discharge. The RWQCB and/or agency providing oversight of wastewater discharge should be contacted by a qualified environmental consultant in conjunction with the contractor and/or property owner for guidance on the requirements for discharge of dewatering effluent, prior to initiation of construction activities. The groundwater management plan mentioned in the previous bullet should be implemented by a contractor during construction activities if groundwater is expected to be encountered. **HS-11** Prior to renovation or demolition of structures, surveys should be conducted for the presence of hazardous building materials such as asbestos-containing materials, lead-containing surfaces, and other materials falling under UWR requirements. The surveys should be conducted by California Department of Public Health Certified Lead Inspector/Assessors and California Division of Occupational Safety and Health Certified Asbestos Consultants in accordance with applicable local, state, and federal guidelines and regulations. Prior to renovation or demolition of buildings, appropriate abatement measures should be implemented by a licensed abatement contractor using trained and certified workers and supervisors. **HS-12** Where structures are demolished, particularly for structures built in 1980 or earlier, analyze surface/shallow soils for lead and termiticides prior to demolition or soil disturbance (e.g., grading).	Less Than Significant
5.15 Public Utilities		

Environmental Impact	Mitigation Measures	Significance After Mitigation
The proposed FPA has the potential to have a cumulative impact on solid waste facilities.	**PU-1** Pursuant to the City's Significance Determination Thresholds, future subsequent development projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the Environmental Services Department and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following: a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy). b. Tons of waste anticipated to be generated (demolition, construction, and occupancy). c. Type of waste to be generated (demolition, construction, and occupancy). d. Describe how the project will reduce the generation of C&D debris. e. Describe how the C&D materials will be reused on-site. f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site. g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling. h. Describe how the waste reduction and recycling goals will be communicated to subcontractors. i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project. j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area. k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase. l. Describe any International Standards of Operation 1, or other certification, if any.	Less than Significant

Final
Programmatic Environmental Impact Report

for the

Grantville Focused Plan Amendment

PTS #346289
SCH #2013111017

Prepared by and for
City of San Diego
Planning Department
1222 1st Ave
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May 2015

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Appendix A Notice of Preparation and Comments to the Notice of Preparation *(Bound with EIR)*

The following are contained on the CD, which is attached to the back of this EIR.

Appendix B Traffic Impact Study
Prepared by Linscott Law and Greenspan
May 12, 2014

Appendix C Air Quality and Greenhouse Gas Study
Prepared by Rincon Consultants, Inc.
May 2014

Appendix D Noise Impact Analysis
Prepared by Rincon Consultants, Inc.
May 2014

Appendix E Biological Resources Report and Opportunities Constraints Analysis
Prepared by Rocks Biological Consulting
May 20, 2014

Appendix F Hydrology Study
Prepared by Fuscoe Engineering
May 14, 2014

Appendix G Programmatic Water Quality Technical Report
Prepared by Fuscoe Engineering
May 14, 2014

Appendix H1 Historical Resources Reconnaissance Survey
Prepared by ASM Affiliates, Inc.
May 2014

Appendix H2 Cultural Resources Technical Report
Prepared by ASM Affiliates, Inc.
November 2013

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Appendix I Geology and Soils Evaluation
Prepared by Ninyo & Moore
May 12, 2014

Appendix J Hazardous Materials Technical Study
Prepared by Ninyo & Moore
November 11, 2013

Appendix K Water Supply Assessment
Prepared by the City of San Diego
Public Utilities Department
July 29, 2014

Appendix L Response to Comments
Prepared by the City of San Diego
Long Range Planning
May 2015

Acronyms

AB	Assembly Bill
ACOE	Army Corps of Engineers
ADD	Assistant Deputy Director
ADL	Aerially-Deposited Lead
AED	Automatic External Defibrillator
AGR	Agricultural Supply
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
AQIA	Air Quality Impact Analysis
AQMD	Air Quality Management District
AQMP	Air Quality Management
AQUA	Aquaculture
ARB	Air Resources Board
ASBS	Area of Special Biological Significance
AST	Aboveground Storage Tank
BAT/BCT	Best Available Technologically Economically Achievable and Best Conventional Pollutant Technology
BAU	Business-as-usual
BI	Building Inspector
BIOL	Biological
BMP	Best Management Practice
C&D	Construction and Demolition
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAISO	California Independent System Operator
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAT	Climate Action Team
CCCC	California Climate Change Center
CCP	Cities for Climate Protection
CCTP	Climate Change Technology Program
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, & Liability Act
CESA	California Endangered Species Act

CFS	Cubic feet per second
CH_4	Methane
CIP	Capital Improvements Program
CM	Construction Manager
CMAP	Climate Mitigation Adaptation Plan
CNEL	Community Noise Level Equivalent
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO_2	Carbon Dioxide
COMM	Commercial and Sport Fishing
CPAP	Climate Protection Action Plan
CPIOZ	Community Plan Implementation Overlay Zone
CPUC	California Public Utilities Commission
CSVR	Consultant Site Visit Record
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	Decibel
dBA	Decibel (A-weighted)
DEH	Department of Environmental Health
DIF	Development Impact Fee
DO	Dissolved Oxygen
DOGGR	Department of Oil, Gas, and Geothermal Resources
DTSC	Department of Toxic Substances Control
DU	Dwelling Unit
DWR	Department of Water Resources
EDU	Equivalent Dwelling Units
EO	Executive Order
ESA	Environmental Site Assessment
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
EST	Estuarine Habitat
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FAR	Floor Area Ratio
FBA	Facility Benefit Assessment
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FESA	Federal Endangered Species Act
FIFRA	Federal Insecticide, Fungicide, & Rodenticide Act
FIRM	Flood Insurance Rate Maps
FPA	Focused Plan Amendment

GCP	General Construction Permit
GFC	Green Climate Fund
GHG	Greenhouse Gas
GIP	Generation Interconnection Procedures
GPM	Gallons per minute
GWP	Global Warming Potential
HFC	Hydrofluorocarbon
HMTA	Hazardous Materials Transportation Act
HrC	Huerhuero loam
HRS	Hazard Ranking System
HU	Hydrologic Unit
HuC	Huerhuero urban land complex
Hz	Hertz
ICLEI	International Council for Local Environmental Initiatives
IND	Industrial Service Supply
IWMA	Integrated Waste Management Act
kWh	kilowatt hours
LDC	Land Development Code
Leq	One-hour, A-weighted equivalent sound level
LF	Landfill
LID	Low Impact Development
LOS	Level of Service
LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
MAR	Marine Habitat
MBAPCD	Monterey Bay Air Pollution Control District
MBTA	Migratory Bird Treaty Act
MCC	Mitigation Monitoring Coordinator
MCE	Maximum Considered Earthquake
Md	Made land
MHPA	Multiple Habitat Planning Area
MIGR	Migration of Aquatic Organisms
mmBTU	million British Thermal Units
MPO	Metropolitan Transit Organization
MS4s	Municipal Separate Stormwater Sewer Systems
MSCP	Multiple Species Conservation Program
MT	metric tons
MUN	Municipal and Domestic Supply
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Strategy
NFPA	National Fire Protection Association
NO	Nitrogen Oxide
NO_2	Nitrogen Dioxide

NOI	Notice of Intent
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NTP	Notice To Proceed
O_3	Ozone
OhF	Olivenhain cobbly loam
OHWM	Ordinary High Water Mark
OSHA	Occupational Safety and Health Act
Pb	Lead
PCB	Polychlorinated Biphenyl
PDP	Planned Development Permit
PFC	Perfluorocarbon
PFFP	Public Facilities Financing Plan
PGA	Peak Ground Acceleration
PI	Principal Investigator
PM_{10}	Particulate Matter less than 10 microns
$PM_{2.5}$	Particulate Matter less than 2.5 microns
PME	Paleontologic Monitoring Exhibit
ppm	parts per million
PRP	Paleontological Recovery Program
PUD	Public Utilities Department
PWD	Public Works Department
RAQS	Regional Air Quality Strategy
RARE	Rare, Threatened, or Endangered Species
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RE	Resident Engineer
REC 1	Contact Water Recreation
REC2	Non-contact Water Recreation
RHNA	Regional Housing Needs Assessment
Rm	Riverwash
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCP	San Diego Sustainable Community Program
SCS	Sustainable Communities Strategies
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDFD	San Diego Fire-Rescue Department

SDG&E	San Diego Gas & Electric
SDMC	San Diego Municipal Code
SDP	Site Development Permit
SDPD	San Diego Police Department
SDRW	San Diego River Watershed
SDUSD	San Diego Unified School District
SDWA	Safe Drinking Water Act
Sf	Square Feet
SF_6	Sulfur Hexafluoride
SFHA	Special Flood Hazard Area
SHELL	Shellfish Habitat
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	Sulfur Dioxide
SPWN	Spawning Habitat
SQG	Small Quantity Generator
SWF	Solid Waste Facility
SWIS	Solid Waste Information System
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TDM	Transportation Demand Management
TDS	Total Dissolved Solids
TeF	Terrace Escarpments
TMDL	Total Maximum Daily Loads
TOD	Transit-Oriented Development
TSCA	Toxic Substances Control Act
TuB	Tujunga sand
UNFCC	United Nations Framework Convention on Climate Change
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
UWR	Universal Waste Rule
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WARM	Warm Freshwater Habitat
WDI	Waste Discharge Identification
WDS	Waste Discharge System
WILD	Wildlife Habitat
WMP	Waste Management Plan
WQTR	Water Quality Technical Report

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1.0 Introduction

This Programmatic Environmental Impact Report (PEIR) for the proposed Focused Plan Amendment (FPA) to the Navajo Community Plan has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) Statute (Public Resources Code, Section 21000 et seq.) and Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.), referred to as the CEQA Guidelines, and in accordance with the City's *Environmental Impact Report Guidelines* (EIR Guidelines; City of San Diego, 2005) and Development Services Department's *California Environmental Quality Act Significance Determination Thresholds* (Significance Determination Thresholds) (City of San Diego, 2011).

This PEIR evaluates the environmental effects associated with ~~the~~ (1) a Community Plan Amendment (CPA) to the Navajo Community Plan; (2) including an amendment to the Community Plan Implementation Overlay Zone (CPIOZ) in the Navajo Community Plan; (3) the processing of rezones to implement the plan amendment; and, (4) an update to the Public Facilities Financing Plan (PFFP) for the Navajo planning area.~~(1) a Community Plan Amendment(CPA) to the Navajo Community Plan; (2) the processing of rezones to implement the plan amendment; (3) the Community Plan Implementation Overlay Zone (CPIOZ); and, (4) an update to the Public Facilities Financing Plan (PFFP) for the Navajo planning area.~~ Collectively these actions comprise the FPA. The CPA is guided by the framework and policy direction of the City of San Diego General Plan and reflects new citywide policies and programs. The CPA would provide detailed neighborhood-specific land use, development design guidelines, policies, and numerous other mobility and local guidelines, incentives, and programs in accordance with the goals stated in the General Plan.

As part of the proposed FPA, the City is proposing to rezone the proposed FPA area and provide a better framework for future development. The Navajo Community Plan currently includes Community Plan Implementation Overlay Zones (CPIOZs) for the proposed FPA area. The Community Plan Amendment would make development regulations consistent with citywide zoning classifications, encourage transit-oriented development, and revitalize the Grantville neighborhood in accordance with the general goals stated in the General Plan.

Discretionary actions by the City Council required to approve the proposed FPA are provided in Table 1-1 below.

Table 1-1: Discretionary Actions Required for Proposed FPA Approval

City of San Diego:
Certification of this PEIR
Adoption of the amended Navajo Community Plan and corresponding amendment of the General Plan
Approval of the rezoning to new Community Commercial zones and a Community Plan Implementation Overlay Zone (CPIOZ)
Approval of an update to the PFFP

Source: BRG Consulting, 2014.

1.1 Purpose of the PEIR and Intended Uses

1.1.1 Purpose of the PEIR

As indicated in Section 15002 of the CEQA Guidelines, the purpose of this PEIR is to:

- Inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, unavoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and,
- Disclose to the public the reasons why the City Council can approve the project if significant environmental effects are involved.

1.1.2 Intended Uses of the PEIR

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, in evaluating the potential environmental effects, mitigation measures, and alternatives of the proposed FPA. By recognizing the environmental impacts of the proposed FPA, decision-makers will have a better understanding of the physical and environmental changes that would accompany the approval of the proposed FPA. 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 the proposed FPA are presented to evaluate alternative development scenarios that would further reduce or avoid significant impacts associated with the project.

In accordance with the CEQA Guidelines, a PEIR may serve as the 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. Implementing actions in the proposed FPA may include, but are not limited to: planned development permits, site development permits, conditional use permits, tentative subdivision maps, development agreements, formation of community facilities districts, and infrastructure improvement plans.

If in examining these future actions 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 Focused EIR).

1.2 EIR Legal Authority

1.2.1 Lead Agency

The City is the Lead Agency for the proposed FPA 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, which has the principal responsibility and authority for carrying out or approving a project.

Under CEQA (California Public Resources Code §21000 et seq.), as amended, and the CEQA Guidelines (Title 14 California Code of Regulations §15000 et seq.), as amended, if a lead agency determines that there is substantial evidence in light of the whole record that a project may have a significant effect on the environment, the agency must prepare an EIR (CEQA Guidelines §15064(a)(1)). The purpose of an EIR is to inform public agency decision makers and the public of the potentially significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (CEQA Guidelines §15121(a)). This PEIR is an informational document for use by the City decision makers, responsible and trustee agencies, and members of the general public to evaluate the environmental effects of the proposed project. This document complies with all criteria, standards, and procedures of CEQA and the CEQA Guidelines. The public agency with the greatest responsibility for supervising or approving the project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the "Lead Agency" pursuant to CEQA Guidelines §15051(b)(1). The City is the Lead Agency for the proposed project evaluated in this PEIR.

On behalf of the Lead Agency, the City's Development Services Department, Environmental Analysis Section, conducted a preliminary review of the proposed FPA and concluded an EIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City. This PEIR will provide the basis for subsequent, project specific CEQA review of specific improvements as the City implements the FPA, and proposed mitigation measures, when taking specific actions necessary to achieve the goals of the City's Navajo Community Plan.

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 which have discretionary approval power over the proposed 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 proposed FPA 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 proposed FPA is provided below.

U.S. Army Corps of Engineers (USACE): The USACE has jurisdiction over development in, or affecting, the navigable Waters of the U.S., pursuant to two federal laws: The Rivers and Harbors Act of 1889 and the Clean Water Act, as amended. A navigable water is generally defined by a blue line as plotted on a

United States Geological Survey (USGS) quadrangle map. Projects that include potential dredge or fill impacts to Waters of the U.S. are subject to Section 404 of the Clean Water Act. Aggregate impacts to Waters of the U.S. (defined as direct fill or indirect effects of fill) greater than one-half acre require a permit. All permits issued by the USACE are subject to consultation and/or review by the U.S. Fish and Wildlife Service and the Environmental Protection Agency (USEPA). No permits from USACE are required at this time; however, individual development projects under the proposed FPA may require review and/or permits in the future.

California Department of Transportation (Caltrans): The southern end of the proposed FPA area contains the Interstate 8 (I-8) corridor. 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 any future projects.

California Department of Fish and Wildlife (CDFW): CDFW has the authority to reach 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, 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. CDFW generally evaluates information gathered during preparation of the environmental documentation, and attempts to satisfy their permit concerns in these documents. No permits from CDFW are required at this time; however, individual development projects under the proposed FPA may require review and/or permits in the future.

San Diego County Air Pollution Control District (APCD): The County Board of Supervisors sits as the Board of the APCD, which is an agency that regulates sources of air pollution within the county. This is accomplished through monitoring, engineering, and compliance divisions within the APCD, designed to protect the public from the adverse impacts of polluted air. No permits from APCD are required at this time. The APCD would be responsible for issuing permits for construction and operation of future projects.

San Diego Regional Water Quality Control Board (RWQCB): The RWQCB regulates water quality through the Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CA 0108758, which consists of wastewater discharge requirements. No permits from RWQCB are required at this time; however, individual development projects under the proposed FPA may require review and/or permits in the future.

San Diego County Regional Airport Authority (Airport Authority): The Airport Authority operates the airports and oversees implementation of adopted plans for the region's air transportation needs. The Airport Authority also serves as San Diego County's Airport Land Use Commission, 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 would review future development proposals within the proposed FPA area and make "consistency determinations" with the provisions and policies set forth in the San Diego International Airport

(SDIA) Airport Land Use Compatibility Plan (ALUCP). No permits from the Airport Authority are required at this time; however, future development projects within the proposed FPA would be subject to the Federal Aviation Administration (FAA) Noticing Area for San Diego International Airport (SDIA) and would be required to provide noticing in compliance with applicable federal regulations.

1.3 EIR Type, Scope, Content, and Format

1.3.1 Type of EIR

This Draft EIR (PTS No. 346289; SCH No. 2013111017) has been prepared as a programmatic environmental impact report (PEIR), as defined in Section 21158 of the CEQA Guidelines. This PEIR is intended to provide information to the City, public and quasi-public agencies and groups, and the general public regarding the potential environmental impacts, mitigation measures, and alternatives to the proposed project. Section 15168 of the State CEQA Guidelines provides guidance on the use and scope of a PEIR, which generally "is an EIR which may be prepared on a series of actions that can be characterized as one larger project." In accordance with CEQA, this PEIR examines the environmental impacts of the proposed FPA, which is comprised of a series of actions. The combined actions can be characterized as one large project for the purpose of this study and is herein referred to as the "proposed FPA". The PEIR focuses primarily on the physical changes in the environment that would result from adoption and implementation of the proposed FPA, including anticipated general impacts that could result during future construction and operation.

1.3.1.1 Environmental Review for Subsequent Projects

Implementation of the proposed FPA would require subsequent approval of public or private development proposals (referred to as "future development" in this PEIR) to carry out the land use plan and policies described in the FPA. The process for accomplishing environmental review for individual future development projects would include preparation of an initial study through a checklist to screen for consistency with the proposed FPA and to determine whether potential impacts of the development were anticipated in the FPA PEIR analysis. Depending on the conclusions of the initial study, a determination would be made as to whether the project is consistent and can rely on the PEIR, or if a Negative Declaration, Mitigated Negative Declaration, or Addendum, Supplemental or Focused EIR would be required for the project.

Pursuant to State CEQA Guidelines Section 15168(c), the certified PEIR would satisfy CEQA requirements for subsequent activities if all of the following conditions can be met:

- Pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required; and
- All feasible mitigation measures or alternatives identified in the PEIR shall be incorporated.
- ~~Subsequent activities could be found to be within the scope of the project described in the PEIR.~~

Pursuant to State CEQA Guidelines Section 15162(a), when an EIR has been certified for a project, preparation of a subsequent EIR shall not be required for that project unless the lead agency determines that any of the following conditions apply:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
- The project will have one or more significant effects not discussed in the previous EIR;
    - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the applicant declines to implement them;
    - Mitigation measures or alternatives, which are considerably different from those analyzed in the previous EIR, would substantially reduce one or more significant effects on the environment, but the applicant declines to implement them.

In accordance with State CEQA Guidelines Section 15168(c), the City would conduct a review of project-specific activities under the FPA. Subsequent project-specific activities would be examined in the light of the PEIR to determine whether the PEIR adequately addresses the potential impacts associated with the subsequent activity or if preparation of an additional environmental review document would be required. Preparation of project-level technical studies may be required when certain conditions apply to project-specific activities under the FPA, as described in this PEIR and Mitigation, Monitoring, and Reporting Program (MMRP). Any required project-specific technical studies would be used to determine whether such activity is within the scope of the PEIR and whether the PEIR adequately describes the activity for the purposes of CEQA.

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 and consideration of comments received in response to the Notice of Preparation (NOP) circulated November 5th, 2013, and a scoping meeting held on November 19th, 2013, at the Mission Trails Regional Park Visitor Center in San Diego, California. The NOP for this PEIR for the proposed FPA and associated discretionary actions, related letters received, and comments made during the scoping meeting are included as Appendix A of this PEIR. Through these scoping activities, the proposed FPA was determined to have the potential to result in significant environmental impacts to the following issue areas:

Land Use
Transportation/Circulation
Air Quality and Odor
Greenhouse Gas Emissions
Noise
Biological Resources
Hydrology
Historical Resources
Visual Effects/Neighborhood Character
Geologic Conditions
Paleontological Resources
Health and Safety
Public Services and Facilities
Public Utilities

The intent of this PEIR is to determine whether implementation of the proposed FPA would have a significant effect on the environment through analysis of all of the issues identified during the scoping process. The PEIR uses the existing conditions as a baseline for analysis of potential environmental effects. Each environmental issue area includes a description of the existing conditions and regulations relevant to each environmental topic; presentation of threshold(s) of significance for the particular issue area under evaluation based on the City's Significance Determination Thresholds; identification of an issue statement; an assessment of any impacts associated with implementation of the proposed FPA according to each issue statement; a summary of the significance of any project impacts; and recommendations for mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant impact. Pursuant to CEQA Guidelines Section 15126, all phases, or in the case of this project, discretionary actions associated with the proposed FPA, are considered in this PEIR when evaluating its potential impacts on the environment, including the construction of future development and operational phases. Impacts are identified as direct or indirect, short-term or long-term, and assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the proposed FPA compared to existing "ground" conditions. The analysis also includes a comparison of impacts that would be associated with implementation of the proposed FPA compared to development in accordance with the current approved community plan (i.e., plan-to-plan).

The PEIR includes mandatory CEQA discussion areas as follows: Chapter 6 presents a discussion of Significant Irreversible Environmental Changes, and Chapter 7 presents a discussion of Growth Inducement. Chapter 8 presents a discussion of Cumulative Impacts based on issues that were found to be potentially cumulatively significant. Chapter 9, Effects Found Not to Be Significant, presents a brief discussion of the environmental effects of the project, which were evaluated as part of the initial scoping and review process and were found not to be potentially significant. Chapter 10 of this PEIR includes a discussion of Project Alternatives, which could avoid or reduce potentially significant environmental effects associated with implementation of the proposed FPA. Alternatives discussed in the PEIR include the No Project (Adopted Community Plan) Alternative, and two Reduced Project Alternatives. For the purposes of this PEIR, the No Project Alternative would be the continued implementation of the adopted community plan with the same land uses as the existing environmental setting.

1.3.3 PEIR Format

1.3.3.1 Organization

The format and order of contents of this PEIR follow the direction in the EIR Guidelines. A brief overview of the various chapters of this PEIR is provided below:

- **Executive Summary.** Provides a summary of the PEIR, a brief description of the proposed FPA, identification of areas of controversy, 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 proposed FPA land use scenario is also provided.

- **Chapter 1, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.

- **Chapter 2, Environmental Setting.** Provides a description of the proposed FPA's regional context, location, and existing physical characteristics and land use within the proposed FPA area. An overview of available public infrastructure and services, as well as relationship to relevant plans, is also provided in this chapter.

- **Chapter 3, Project Description.** Provides a detailed discussion of the proposed FPA including background, components, and objectives. A comparison of the land use designations and area associated with each designation is included in this chapter to highlight the differences between the existing plan and proposed FPA. A discussion of the discretionary actions required to implement the proposed FPA is also included.

- **Chapter 4, History of Project Changes.** Provides a summary of the origin and subsequent revisions of the proposed FPA throughout the life of the project.

- **Chapter 5, Environmental Analysis.** Provides a detailed evaluation of potential environmental impacts associated with the proposed FPA for several environmental and land use issues. Chapter 5 begins with the issue of land use, followed by the remaining issues in order of significance. The analysis of each issue begins with a discussion of the existing conditions, a statement of specific thresholds used to determine significance of impacts, followed by an evaluation of potential impacts and identification of specific mitigation measures to avoid or reduce any significant impacts. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is provided.

- **Chapter 6, Significant Irreversible Environmental Changes.** Provides a summary of any significant and unavoidable impacts associated with implementation of the proposed FPA.

- **Chapter 7, Growth Inducement.** Evaluates the potential influence the proposed FPA may have on economic or population growth within the proposed FPA area as well as the region, either directly or indirectly.

- **Chapter 8, Cumulative Impacts.** Provides an analysis of the impacts of the proposed FPA considered in combination with other planned and future development in the region.

- **Chapter 9, Effects Found Not to Be Significant.** Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant and briefly summarizes the basis for these determinations.

- **Chapter 10, Alternatives.** Provides a description of alternatives to the proposed FPA, including a No Project (Adopted Community Plan) Alternative, and two Reduced Project Alternatives.

- **Chapter 11, Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the PEIR.

- **Chapter 12, References Cited.** Lists all of the reference materials cited in the PEIR.

- **Chapter 13, Certification.** Certifies that the independent analysis and determinations made in the PEIR are pursuant to the San Diego Land Development Code Section 128.0103.

1.3.3.2 Technical Appendices

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.

The technical appendices are available for review at the City Development Services Department located at 1222 First Avenue, San Diego, California, 92101, and on the website for the Grantville Focused Plan Amendment (http://www.sandiego.gov/planning/community/cpu/grantvillemasterplan/index.shtml)

1.3.3.3 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 described. These documents are included in Chapter 13, References Cited, and are hereby incorporated by reference, and are available for review at the City Development Services Department, located at 1222 First Avenue, San Diego, California, 92101.

- City of San Diego General Plan (City of San Diego 2008a)
- City of San Diego Program Environmental Impact Report for the General Plan (Final PEIR) (City of San Diego 2007b)
- City of San Diego Municipal Code (City of San Diego 2008b)
- City of San Diego Navajo Community Plan, as amended (City of San Diego 1982)

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 three basic stages. The first stage is the Notice of Preparation (NOP), which provides the opportunity for the public to comment about what should be addressed in the Draft PEIR. The second stage is review of the Draft EIR, which offers the public the opportunity to comment on the document. The third stage is completion of the Final PEIR, which addresses comments on the Draft PEIR and is presented to the decision-makers for their consideration prior to approving the proposed FPA.

1.4.1 Notice of Preparation

The CEQA Guidelines §15082, provides guidance for the issuance of a Notice of Preparation (NOP), stating:

> "Immediately after deciding that an environmental impact report is required for a project, the lead agency shall send to the Office of Planning and Research and each responsible and trustee agency a notice of preparation stating that an environmental impact report will be prepared."

The City issued a NOP for the preparation of a PEIR analyzing the FPA, for a 30-day public review from November 5, 2013, to December 5, 2013. The public review and comment period meets the 30-day requirement for commenting under CEQA Guidelines §150829(b).

The NOP was delivered to city, county, and state and federal agencies, other public agencies, and various interested private organizations and individuals. The NOP included a description of the project, location of the project area, the components of the FPA under review, and any probable environmental effects of the proposed FPA.

CEQA Guidelines §15082(c)(1) requires that, "for projects of statewide, regional or area wide significance pursuant to §15206, the lead agency shall conduct at least one scoping meeting." A scoping meeting was held by the City on Tuesday November 19, 2013 from 6:00 to 8:00 p.m. at the Mission Trails Regional Park Visitor Center. At the scheduled meeting, members of the public were invited to ask questions regarding the proposed project and environmental review process, and to comment in writing on the scope and content of the PEIR.

The City received comments submitted in person, U.S. mail and via e-mail. All written comments received during the extended review period for the NOP, as well as those received beyond the official close of public comment (December 5, 2013), were considered by the Lead Agency in preparation of this PEIR. Appendix A of this PEIR contains copies of the Scoping Meeting notices along with the written comments received on the project. While not required under CEQA, the City did consider verbal comments made at the Scoping meeting, which can be found in the transcripts for these meetings, also contained in Appendix A.

1.4.2 Draft PEIR

The Draft PEIR is distributed to the public and interested and affected agencies for a review period of 60 days for the purpose of providing 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). In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft PEIR a Notice of Completion will be filed with the State Office of Planning and Research and Notice of Availability of the Draft PEIR issued in the San Diego Union Tribune, 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 City Development Services: Advanced Planning and Engineering Division, located at 1222 First Avenue, Fourth and Fifth Floors, San Diego, California 92101, and on the website for the Grantville Focused Plan Amendment:

http://www.sandiego.gov/planning/community/cpu/grantvillemasterplan/index.shtml

Copies of the Draft PEIR are also available at the public libraries in the city, as listed in Table 1-2:

Table 1-2: List of Libraries for Distribution of Draft PEIR

Branch Name	Location
Allied Gardens/Benjamin Library	5188 Zion Ave, San Diego, CA 92120
Mission Valley Library	2123 Fenton Parkway, San Diego, CA 92108
Tierrasanta Library	4985 La Cuenta Dr., San Diego, CA 92124

1.4.3 Final PEIR

Comments addressing the scope and adequacy of the environmental analysis are being solicited during the Draft PEIR public review. 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 impacts identified in the Draft PEIR as significant and unmitigable, will be prepared and compiled as part of the PEIR finalization process. The culmination of this process is public hearings by the Planning Commission and the City Council. The Planning Commission will consider and review the PEIR when making its recommendation to the City Council regarding approval of the proposed FPA. At the public hearing where the City Council determines whether to approve the proposed FPA and associated actions, the Council will determine whether to certify the Final PEIR as being complete and in accordance with CEQA. The Final PEIR will be available for public review at least 14 days before the public hearing in order to provide the public the opportunity to review the written responses to their comment letters.

2.0 ENVIRONMENTAL SETTING

2.1 Regional Context

The Navajo community planning area of San Diego is approximately 8,000 acres in size and is located in the easterly portion of the City of San Diego. It includes the community areas of Allied Gardens, Del Cerro, Grantville and San Carlos. It is bounded on the north by Mission Gorge, on the east by the cities of El Cajon and La Mesa, on the south by Interstate 8 (I-8) and on the west by the San Diego River channel. These areas are accessible by major streets and freeways (See Figure 2-1).

2.2 Project Location

The proposed Focused Plan Amendment (FPA) area is located west of Interstate 15 (I-15) and north of I-8. The proposed FPA is bounded by the Admiral Baker Golf Course to the north and the San Diego River to the west. The proposed FPA area consists of approximately 280 acres and is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue. Figure 2-2 highlights the limits of the proposed FPA area.

2.3 Existing Physical Characteristics

The environmental setting of the proposed FPA is briefly described below. Section 5.0 of this PEIR provides additional, more specific information relating to the proposed FPA's current environmental and regulatory setting pertaining to: land use, transportation, air quality, greenhouse gas emissions, noise, biological resources, hydrology, water quality, historical resources, visual effects and neighborhood character, geological conditions, paleontological resources, health and safety, public services and facilities, and public utilities.

2.3.1 Physiography

The community is characterized by a wide variety of natural features typical of many other San Diego areas, including flat mesas, steep canyons, and rolling hills. The proposed FPA area is a low point with a gradual climb in elevation to reach Friars Road. The proposed FPA area has been previously developed and is primarily covered by impervious surfaces.

2.3.1 On-site Land Use

The existing development in the proposed FPA area includes older commercial and industrial uses with a smaller mix of office/professional, public/institutional uses, and parks. The proposed FPA area is generally characterized by underutilized land and buildings, incompatible land uses, parcels of irregular sizes and forms which hinder development, limit parking, and provide inadequate vehicle access.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Regionl Vicinity

FIGURE 2-1



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Project Location

FIGURE
2-2

Restaurants, automotive sales, and maintenance businesses tend to dominate Mission Gorge Road frontage. Industrial uses are more common along Fairmount Avenue near the San Diego River, where there is less vehicular through-traffic. Institutional uses include the Kaiser Permanente Foundation Hospital on Zion Avenue, and the Kaiser Permanente Medical Office Facilities and Ophthalmology Laboratory located one-quarter mile southwest on Vandever Avenue. Open space areas include portions of the San Diego River and river valley on the west side of the proposed FPA area between Friars Road and San Diego Mission Road; however, this land is privately owned and there are currently no trailheads, parking lots, or other officially-established access points to this land. The Federally-owned San Diego Naval Base Admiral Baker Golf Course, which includes an RV Park and picnic area, is located north of Friars Road and west of Mission Gorge Road, adjacent to the San Diego River.

2.3.2 Transportation/Circulation

The existing average daily traffic on the major roadways within the proposed FPA area ranges from approximately 35,560 to 54,410 average daily trips (ADT) along Friars Road, approximately 17,710 to 37,470 ADT along Mission Gorge Road, approximately 5,490 to 47,690 ADT along Fairmount Avenue, approximately 5,600 ADT along Vandever Avenue, approximately 5,100 ADT along Twain Avenue, approximately 5,620 to 7,680 ADT along San Diego Mission Road, and approximately 16,360 ADT along Waring Road. Bus service is provided along certain portions of the proposed FRA area's roadways, including MTS Routes 13, 40, and 81. Many Navajo Community residents are transit-dependent and use the bus for transportation to work (35-87 percent) and transportation to school (36-54 percent). Because of the community's proximity to San Diego State University and Grossmont College, the percentage of riders using public transit for the home to school trips exceeds the citywide average. The San Diego Trolley's Green Line traverses the southern portion of the proposed FPA area, connecting Mission Valley to the west with San Diego State University to the east. The Green Line has a stop at the Grantville Station, located just north of I-8 and east of Mission Gorge Road. The existing public transit is underutilized by the commercial and industrial uses.

2.3.3 Air Quality and Odor

The proposed FPA area is located within the San Diego Air Pollution Control District (SDAPCD) of the San Diego Air Basin (SDAB), which includes 11 monitoring stations throughout the District. The climate of the SDAPCD is strongly influenced by its proximity to the Pacific Ocean and the location of the semi-permanent high-pressure cells in the northeastern Pacific. With a Mediterranean-type climate, the proposed FPA area is characterized by warm, dry summers and cool winters with occasional rainy periods. The moderating effect of the ocean regulates the coastal temperature to ranges of 58°F to 71°F. Daytime temperatures are much warmer in nearby valleys in the summer and nights are noticeably cooler in the winter.

San Diego County is listed as a federal non-attainment area for ozone (8-hour), and a state non-attainment area for ozone (1-hour and 8-hour standards), PM_{10}, and $PM_{2.5}$. Non-attainment status for the SDAPCD is a result of several factors, primarily the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants (surface and subsidence inversions); the limited capacity of the local airshed to eliminate pollutants from the air; and, the number, type, and density of emission sources within the San Diego Air Basin. The closest SDAPCD air quality monitoring station to the proposed FPA area is the Kearny Villa Road station. In the proposed FPA area, both the federal and state ozone standards were exceeded

at the Kearny Villa Road station during 2011 and 2012. The $PM_{2.5}$ concentration exceeded the state standards on one occasion in January 2012.

2.3.4 Greenhouse Gas Emissions

Greenhouse Gases (GHGs) are gases that absorb and re-emit infrared radiation in the atmosphere. GHGs such as water vapor and carbon dioxide are abundant in the earth's atmosphere. Over the years, as human activities resulted in burning fossil fuels, stored carbon has been released into the air in the form of Carbon Dioxide (CO_2), and to a much lesser extent Carbon Monoxide (CO). It is believed that other greenhouse gases such as Methane (CH_4), and Nitrous Oxide (NO) contribute to planetary heating. According to "*The Impacts of Sea-Level Rise on the California Coast*," prepared by the California Climate Change Center (CCCC), climate change has the potential to induce substantial sea level rise in the coming century. Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which would further worsen air quality.

Uses in the proposed FPA area generate the following GHGs of concern: Carbon Dioxide (CO_2), Methane (CH_4), and Nitrous Oxide (N_2O). However, international, federal, state, and local regulations have been developed to reduce the amount of GHGs emitted with new construction.

2.3.5 Noise

The primary existing noise sources in the proposed FPA area are transportation and stationary sources. The most common source of transportation noise in the proposed FPA area is motor vehicle (e.g., automobiles, buses, trucks, and motorcycles) operation along the arterial roadways. These include San Diego Mission Road, Fairmount Avenue, Mission Gorge Road, Friars Road, Mission Gorge Place, Alvarado Canyon Road and Waring Road. Interstate 8 is located generally along the southern boundary of the proposed FPA area. Motor vehicle noise is characterized by a high number of individual events which often create a sustained noise level. Motor vehicle noise is the primary concern associated with the proposed project, because the project would replace existing office, commercial and industrial uses, which are less sensitive to traffic noise, with mixed use residential along the primary road corridors referenced above. Transportation noise sources also include light rail traffic along the San Diego Trolley Green Line and at the Grantville Transit Station. Stationary noise sources include industrial and commercial operations.

2.3.6 Biological Resources

A majority of the proposed FPA area is developed and devoid of sensitive or native biological resources. However, the proposed FPA area includes portions of the San Diego River, a regionally significant biological resource. A total of 11 vegetation communities have been delineated within the proposed FPA area, with most of the native communities occurring within the San Diego River area. Vegetation communities include Diegan Coastal Sage Scrub, Disturbed Land, Freshwater Marsh, Giant Reed, Jurisdictional Streambed, Non-Native Grassland, Open Water, Ornamental, Riparian Forest, Southern Riparian Scrub, and Urban/Developed. Riparian Forest occupies approximately 26.0 acres of the proposed FPA area, primarily

along the San Diego River. Southern Riparian Scrub occupies approximately 1.9 acres, Freshwater Marsh occupies approximately 1.4 acres, and Open Water occupies approximately 11.0 acres. The proposed FPA area supports limited native floral diversity throughout much of the area because the majority of the proposed FPA area is Urban/Developed. Nevertheless, several sensitive species have the potential to occur in the proposed FPA area, including the federally listed endangered Least Bell's Vireo, threatened Coastal California Gnatcatcher and CDFW sensitive Cooper's Hawk and Rufous-crowned Sparrow. Portions of the proposed FPA area are located within and adjacent to the City's MSCP Multi-Habitat Planning Area (MHPA). The MSCP identifies the San Diego River corridor as a Core Biological Habitat Linkage between the Pacific Ocean and Mission Trails Regional Park.

2.3.7 Hydrology

The San Diego River is the primary hydrologic feature within the proposed FPA area. The San Diego River generally forms the western boundary of the proposed FPA area as it flows from the north through the Navajo Community into Mission Valley. The San Diego River originates in the mountains northwest of the historic town of Julian and runs southwestward through an unincorporated, largely uninhabited area of San Diego County before entering El Capitan Reservoir. Downstream of El Capitan Reservoir, the river flows westward through the Cities of Santee and San Diego and past Famosa Slough to the San Diego River Estuary. The river discharges into the Pacific Ocean just south of the jettied entrance of Mission Bay in the community of Ocean Beach. The majority of the runoff from the proposed FPA area flows into the San Diego River. Alvarado Canyon Creek traverses the southern portion of the proposed FPA area, and is a tributary to the San Diego River. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), the low-lying areas near the San Diego River and Alvarado Creek are within 100- and 500-year floodplains. The potential for significant flooding for parcels located near the San Diego River and Alvarado Creek is high.

The central and northerly portions of the proposed FPA area currently slope to the west toward the San Diego River, while the southerly portion of the FPA area slopes towards Alvarado Creek, which runs through this portion of the project area. The existing network of streets and storm drain systems discharges runoff from landing these areas to the respective watercourses at several outlet points.

The proposed FPA area is located within the Mission San Diego Hydrologic Subarea, within the Lower San Diego Hydrologic Area and the Mission San Diego Hydrologic Subarea (907.11). The proposed FPA area drains to the Alvarado Creek hydrologic basin, and the San Diego River basin. The San Diego River makes up the northwesterly and westerly boundaries of proposed FPA area. The northerly and westerly portions of the proposed FPA area drain to the San Diego River through surface flow and storm drain systems. These storm drain systems convey runoff from the adjacent residential area to the east through the proposed FPA area to the San Diego River.

The hydrologic setting consists of approximately 213 acres of hardscape and 65 acres of softscape, within a basin area of approximately 280 acres, which means the impervious surfaces encompass approximately 76% of the proposed FPA area. The existing runoff coefficient is 0.78.

2.3.8 Water Quality

The San Diego River and Pacific Ocean at the San Diego River Outlet have the following 303(d) listed impairments: Fecal Coliform, Low Dissolved Oxygen (DO), Phosphorus, Total Dissolved Solids (TDS), and Indicator Bacteria. However, the State of California has not identified any total maximum daily loads (TMDLs) for the pollutants to any of the receiving waters from the proposed FPA area. The hydrologic unit contains several beneficial uses, which are described in detail in Section 5.8 of this PEIR.

2.3.9 Historical Resources

No historic resources have been identified in the proposed FPA that represent historical themes and periods of this area of San Diego. No property types that reflect the Mission San Diego de Alcala period (1769-1887) are extant in the proposed FPA area. No extant resources were identified in the proposed FPA area that represent the Early Community Development period (1887-1888). Residential, commercial, and industrial Agricultural Community Development (1887-1953) properties were identified in the proposed FPA area. Two residential buildings constructed before 1954 remain in the proposed FPA area. Three commercial buildings constructed before 1954 remain in the proposed FPA area. One industrial building constructed before 1954 remains in the proposed FPA area. Four properties were identified that have the potential to reflect the Commercial, Industrial, Manufacturing Development (1954-1973) theme and period. Five residential buildings constructed between 1954 and 1973 remain in the proposed FPA area. None sufficiently represent the suburban residential tract development typical of Grantville's Commercial, Industrial, and Manufacturing Development period, and all possess low or moderate integrity. None are likely eligible. Four commercial buildings retain high integrity and have the potential to be eligible. No industrial buildings of this time period reflect high integrity and therefore are not likely eligible. One institutional building remains but possesses low integrity and therefore, is not likely eligible. Overall, five parcels within the proposed FPA area are recommended for future evaluation as potential eligible historic resources.

The proposed FPA area is largely developed, and ground surface visibility is poor across the proposed FPA area. No archaeological resources have been previously recorded within the proposed FPA area, and no archaeological resources were identified during the current survey.

2.3.10 Visual Effects/Neighborhood Character

The proposed FPA area is situated in the eastern portion of the City of San Diego, in the Navajo Community Plan area. The City of San Diego has adopted a Community Plan which provides guidelines related to land use and development (as further described below in Section 5.10.1.2). The proposed FPA area is part of the Grantville Community, which is included in the larger 8,000-acre Navajo Community. Grantville is a major employment center located within the western portion of the Navajo community.

The proposed FPA area is generally urban in character. The existing development within the proposed FPA area includes commercial, office, industrial-related structures, residential, public and institutional facilities, parks, open space, and vacant land, but is mostly commercial and industrial in nature. The residential uses are minimal but include single-family and multi-family structures. Although the area includes the Grantville

Trolley Station, the proposed FPA area is not pedestrian or bicycle friendly; therefore, most views would occur from vehicles and public transit. The open space areas within the proposed FPA area include the San Diego River, a portion of Mission Trails Regional Park, and Alvarado Canyon to the southeast.

The Navajo Community Plan does not include any officially designated scenic viewpoints or landmarks. Public views towards the above mentioned scenic resources are minimal and scattered throughout the community. Since the community does not exhibit pedestrian-oriented design features and the commercial and industrial development occurs in a one- to two-story horizontal configuration along the landscape of the area, most public views towards scenic resources are blocked by industrial development. Overall, public views towards scenic resources are minimal in the proposed FPA area.

2.3.11 Geologic Conditions

The proposed FPA area is situated in the coastal foothill section of the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges encompasses an area that extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin south to the southern tip of Baja California. The province varies in width from approximately 30 to 100 miles. In general, the province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the southern California batholith. The Peninsular Ranges Province is traversed by a group of sub-parallel faults and fault zones trending roughly northwest. Several of these faults are considered active. The Elsinore, San Jacinto and San Andreas faults are active fault systems located northeast of the proposed FPA area. The Rose Canyon, Coronado Bank, San Diego Trough, and San Clemente faults are active faults located west of the proposed FPA area. Major tectonic activity associated with these and other faults within the regional tectonic framework consists primarily of right-lateral, strike-slip movement.

2.3.12 Paleontological Resources

Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. Paleontological resources (i.e., fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of man. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

The proposed FPA area is in the Coastal Plain region of the Peninsular Ranges Geomorphic Province, and contains several rock formations. This province is underlain by a sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of earth history. Over this period of time, the relationship of land and sea has fluctuated drastically, such that today there are ancient marine rocks preserved up to elevations of about 900 feet above mean sea level (AMSL). Geologic deposits and formations in the ~~proposed FPA area~~Navajo Community Plan area include alluvium, river/stream terrace deposits, Mission Valley Formation, Stadium Conglomerate, and Friars Formation. Of the formations within the proposed FPA area, ~~the Mission Valley Formation, Stadium Conglomerate, and Friars Formation have a high sensitivity rating for paleontological resources.~~ there are no geologic formations with a high or moderate sensitivity rating for paleontological resources.

2.3.13 Health and Safety

Portions of the proposed FPA area to the north, west, and southeast are located within a Very High Fire Hazard Severity Zone (VHFHSZ) as designated by the City of San Diego Fire-Rescue Department. In addition, an environmental database search including federal, state and local databases revealed that a number of facilities within the proposed FPA area were listed on unauthorized hazardous materials release databases. In general, the unauthorized release facilities are located along major streets within the proposed FPA area, including Friars Road, Mission Gorge Road, and Fairmount Avenue. Some of the unauthorized release cases remain open with regulatory agencies, generally indicating that impacts to soil and/or groundwater have not been assessed, and/or that remedial activities are ongoing. Based on a review of the regulatory databases, impacts to soil and groundwater have been documented at multiple properties within the proposed FPA area.

There are also a number of commonly encountered environmental conditions found in developed areas similar to the proposed FPA area, including aerially-deposited lead, treated wood, asbestos-containing materials, polychlorinated biphenyl-containing materials, lead-based paint, and other miscellaneous hazardous materials.

The locations of potential sensitive receptors to hazardous materials/waste impacts are located within the proposed FPA area. Schools, daycare, and/or education-related facilities noted in the proposed FPA area include Little Sprouts Academy, Dehesa Charter School, Mission Nazarene Child Care, Academy of Learning Preschool, Junior Achievement of San Diego, and Gold N Child Care Services. National University, Nazareth School, and Stein Education Center are located in the vicinity of the proposed FPA area, beyond the proposed FPA area boundaries. Hospitals in the proposed FPA area include Kaiser Permanente Foundation Hospital, located south of Zion Avenue and West Crawford Street, and the Kaiser Permanente Medical Facility located at 4405 Vandever Avenue between Fairmount Avenue and Mission Gorge Road.

2.3.14 Public Services and Facilities

Existing public services and facilities include police, fire-rescue, libraries, parks and recreational facilities, and schools that serve the residents and businesses within the proposed FPA area and surrounding communities. The following is a brief description of the existing public services and facilities.

2.3.*14.1* *Police Services*

The San Diego Police Department (SDPD) provides police services including patrol, traffic, investigative, records, laboratory, and support services to the City of San Diego (City of San Diego 2008a). The 2013 citywide staffing ratio for sworn police officer to population is 1.48 officers per 1,000 residents. The proposed FPA area is currently patrolled by Beat 321 in the Grantville neighborhood in the Eastern Division of the SDPD. The Eastern Division currently serves a population of 155,892 people and encompasses a total of approximately 47.1 square miles. The Eastern Division Police Substation houses approximately 108 sworn officers, and is located approximately 1.86 miles northwest of the proposed FPA area at 9225 Aero Drive, in the Serra Mesa community. Additional resources (such as SWAT, canine units, etc.) respond to the Eastern Division as needed.

2.3.14.2 Fire/Life Protection

The proposed FPA area is located within the service area of the City of San Diego Fire-Rescue Department (SDFD). The SDFD serves a total area of approximately 331 square miles, 17 miles of coastline extending three miles offshore, and population of approximately 1,337,000 people (City of San Diego Fire-Rescue, 2013). The SDFD has a current total of 47 fire stations and 9 permanent lifeguard stations, and employs 1,339 uniformed personnel and 161 civilian personnel for a total of 1,300 personnel. Three SDFD fire stations are located within the vicinity of the proposed FPA and would provide fire and emergency services to the FPA area:

- Station 31 located at 6002 Camino Rico
- Station 45 located at 9449 Friars Road
- Station 17 located at 4206 Chamoune Avenue

Fire Station 31 is the primary responding unit for the proposed FPA area and serves Grantville/Del Cerro and its surrounding areas. Station 31 is located approximately 1.14 miles east from the proposed FPA area. In addition, Engine 31's district is 6.30 square miles. This station includes a fire engine, a paramedic unit, and a medic rescue rig.

2.3.14.3 Libraries

The proposed FPA area is currently served by two City of San Diego Public Library branch libraries, each within the two-mile service area identified in the City of San Diego's CEQA Significance Thresholds. The Allied Gardens/Benjamin Library is a 3,875 square foot facility located at 5188 Zion Avenue, approximately 0.73 miles east from the proposed FPA. Based on the 15,000 square foot requirement of the General Plan, the Allied Gardens/Benjamin Library is severely deficient in dedicated library space. Also, the Mission Valley Library is a 20,000 square foot facility constructed in 2002, located at 2123 Fenton Parkway, approximately 1.30 miles west of the proposed FPA. The Mission Valley Library and the proposed FPA are directly linked by the trolley line.

2.3.14.4 Parks/Recreational Facilities

The City of San Diego has over 38,930 acres of park and open space lands that offer a diverse range of recreational opportunities. Parks can improve the quality of life by assisting in maintaining physical well-being. Parks can also provide other benefits, including visual relief from urban development, passive recreational opportunities, and healthy activities for youth.

There are only two population-based parks located within the half-mile, and one and one-half mile service area for neighborhood and community parks, respectively. The Grantville Neighborhood Park, located on Vandever Avenue, is approximately 2.66 acres and includes an open play lawn, a tiny-tots play area, and picnic facilities. Allied Gardens Community Park and Recreation Center, located adjacent to Lewis Middle School, is approximately 13.4 acres and includes a 9,186 square foot recreation center and swimming pool. In addition, it includes an additional 4.8 acres of turfed athletic fields located on the Lewis Middle School campus that are usable by the community through a school/City joint-use agreement. Resource based parks in the Navajo Community include Mission Trails Regional Park and the San Diego River Park.

2.3.14.5 Schools

The proposed FPA area is located within two separate attendance boundaries of the San Diego Unified School District (SDUSD). Portions of the proposed FPA west of Mission Gorge Road are located within an Optional Area attendance boundary, while portions of the proposed FPA east of Mission Gorge Road are located within a typical single school attendance boundary. There are six SDUSD schools that serve the proposed FPA area, including two elementary schools, two middle schools, and two high schools. The six schools that serve the proposed FPA area include Juarez Elementary, Foster Elementary, Lewis Middle, Taft Middle, Patrick Henry High, and Kearny High School Educational Complex. Students located in the proposed FPA area west of Mission Gorge Road may choose any of the listed schools (the preference among existing students is for Foster, Lewis, and Henry). Students located in the proposed FPA area east of Mission Gorge Road are assigned only to Foster, Lewis, and Patrick Henry.

2.3.15 Public Utilities

2.3.15.1 Water

The City of San Diego Public Utilities Department (PUD) Water Branch provides potable and reclaimed water service to the proposed FPA area and the rest of the 1.3 million residents of the City. The PUD oversees a municipal water system that includes more than 3,300 miles of distribution pipeline, nine reservoirs with a total capacity of 415,000 acre-feet (AF), and an average of 200 million gallons of water delivered daily to customers. The City's PUD purchases up to 90 percent of its water from the San Diego County Water Authority (Water Authority), which itself purchases most of its water from the Metropolitan Water District (MWD). While the PUD imports the majority of its water, it also relies on local surface water, recycled water, and water conservation.

The City's water system consists primarily of nine raw water storage facilities with over 408,000 AF of storage capacity, three water treatment plants, 28 treated water storage facilities, and more than 3,294 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, located at the Otay Water Treatment Plant, Alvarado Water Treatment Plant, and Miramar Water Treatment Plant. These three water treatment plants have a total combined rated capacity of 294.4 million gallons per day (MGD).

2.3.15.2 Sewer/Wastewater

The City's PUD provides wastewater collection, treatment, and disposal services to the proposed FPA area and the rest of the San Diego region through its Metropolitan Sewerage System, serving a population of approximately 2.2 million residents in a 450 square mile service area. An average of 180 million gallons of wastewater is treated every day. The City of San Diego also operates and maintains the approximately 3,000-mile Municipal Sewerage Collection System for the collection and conveyance of wastewater from residences and businesses in the City. Wastewater is conveyed to the North City Reclamation Plant, the Point Loma Wastewater Treatment Plant, and the South Bay Water Reclamation Plant. Treated effluent is discharged into the Pacific Ocean through two ocean outfalls, one at Point Loma and the other north of the International Border with Mexico.

The Navajo community is bounded by two major trunk sewers, which serve the communities in the El Cajon Valley and the City of La Mesa, as well as the Navajo community and adjacent communities. One large trunk sewer is located in Mission Gorge and the other is located in Alvarado Canyon. These two major trunk sewers are capable of serving a combined population of 300,000 people and related services.

2.3.15.3 Stormwater

Municipalities in San Diego County collect and discharge stormwater and urban runoff containing pollutants through their storm water conveyance systems. The San Diego Regional Water Quality Control Board (RWQCB) issued the required National Pollutant Discharge Elimination System (NPDES) permit to local jurisdictions, including the City of San Diego, which requires the implementation of programs to reduce pollutants in stormwater and urban runoff. The City of San Diego regulates stormwater discharge through the Storm Water Division of the Transportation and Storm Water Department.

2.3.15.4 Solid Waste

Solid waste disposal in the proposed FPA area is provided by the combined services of the City of San Diego's Environmental Services Department (ESD) and private contractors. 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). The City provides free solid waste collection services 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 City is primarily taken to three landfills. The majority of waste that is not diverted to beneficial use is disposed at the Miramar Landfill, which is expected to be in operation through 2022 at current waste disposal rates. The remaining waste goes to other landfills, including the Otay Landfill or Sycamore Landfill.

2.3.15.5 Electricity and Natural Gas

Electrical power and natural gas service for the proposed FPA area is provided by the San Diego Gas and Electric Company (SDG&E), which is the primary provider throughout the San Diego metropolitan area. Energy that is provided throughout California, including the proposed FPA area, is generated by numerous power plants that are located within and outside the State. Electricity and natural gas is supplied via the electric grid and transmission lines.

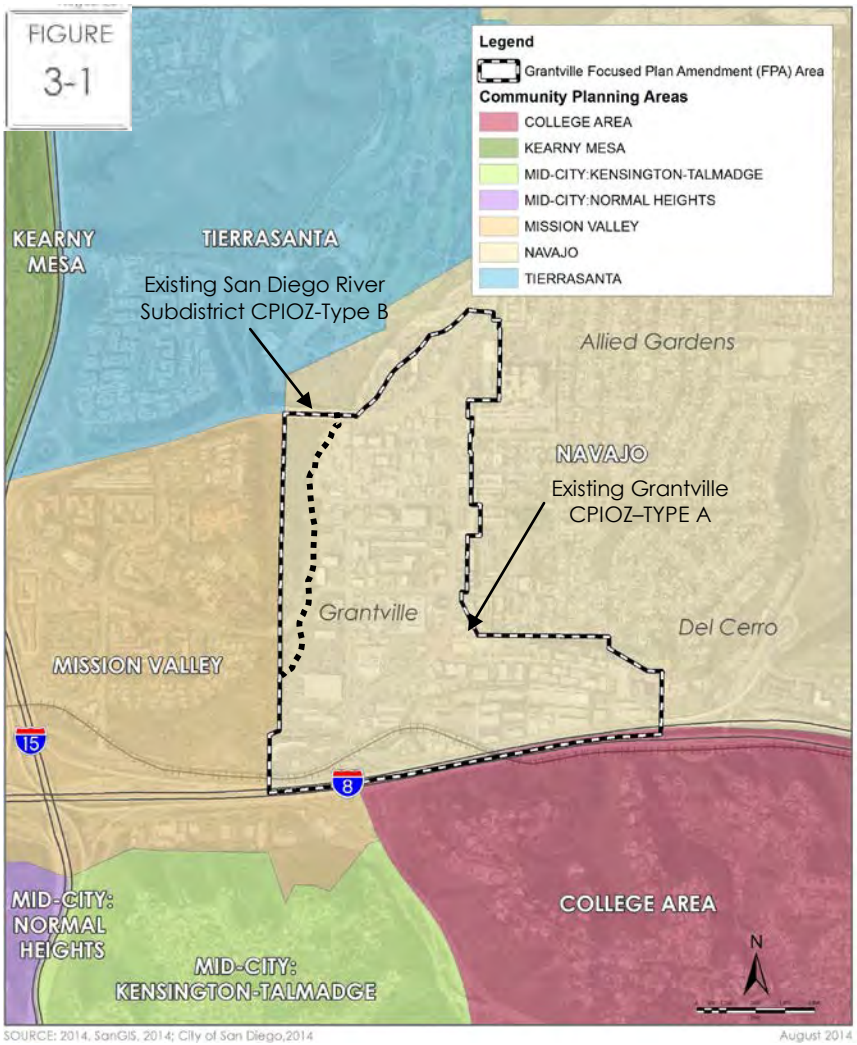
There are two electric transmission lines and one gas transmission line within the limits of the Navajo Community. At present, no additional electric transmission lines or electric substations are planned for the area. If additional transmission capacity were required, the existing lines typically would be reconducted within the existing easements.

3.0 PROJECT DESCRIPTION

3.1 Introduction

The City of San Diego has adopted community plans that provide additional development guidelines for each community and the proposed FPA is located within the Navajo Community Planning Area. The proposed FPA will set out the long-range vision and comprehensive policy framework for how Grantville could develop over the next 20 to 30 years through a Community Plan Amendment to the Navajo Community Plan. The proposed FPA will provide policy direction for future development and has been guided by the citywide policy direction contained in the City of San Diego General Plan (2008).

The proposed FPA was developed through a series of design charrettes and several years of monthly stakeholder meetings in the Navajo community. This area was one of several subareas considered for a land use plan amendment. Through an extensive community outreach process, several alternative land use scenarios were developed. Ultimately, the City of San Diego decided to focus specifically on the Grantville neighborhood. The Grantville Stakeholders Committee recommended Alternative D as the preferred land use scenario to be analyzed for the proposed FPA.



The proposed FPA consists of four components: (1) a Community Plan Amendment (CPA) to the Navajo Community Plan; (2) including an amendment to the Community Plan Implementation Overlay Zone (CPIOZ) in the Navajo Community Plan; (3) the processing of rezones to implement the plan amendment; and, (4) an update to the Public Facilities Financing Plan (PFFP) for the Navajo planning area. The focused plan amendment to the Navajo Community Plan – Grantville CPIOZ section

includes supplemental design regulations that set the vision and goals for development in Grantville. ~~(1) an amendment to the Navajo Community Plan; (2) the processing of rezones to implement the plan amendment; (3) a Community Plan Implementation Overlay Zone (CPIOZ) amendment; and, (4) an update to the Public Facilities Financing Plan (PFFP) for the Navajo community.~~

The proposed FPA would be implemented through ~~through the adoption of four new Community Commercial (CC) zones (CC-2-5, CC-3-6, CC-3-8, and CC-3-9)~~ the rezone of approximately 227 acres. The application of these zones, together with the amendment of the Grantville CPIOZ, will serve as the implementation tools to achieve the proposed land use amendments associated with the proposed FPA. The amended CPIOZ will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation, and allow for increased density of up to 109 dwelling-units per acre~~, for a maximum total of approximately up to 4,594 dwelling units,~~ in the area surrounding the existing Grantville Trolley Station ~~when certain criteria are met~~. ~~The list of criteria will be included in the text of the Navajo Community Plan as a focused amendment to the plan~~ The Navajo Community Plan – Grantville CPIOZ Section includes Supplemental Design Regulations (SDR) that identify criteria for any development project in the FPA area.

The proposed FPA area covers two CPIOZ described in the Navajo Community Plan: Grantville-CPIOZ-Type A and part of the existing San Diego River Subdistrict – CPIOZ Type B. The list of criteria will be included in the text of the Navajo Community Plan as a focused amendment to the plan; however, the Grantville CPIOZ-Type A area is the primary focus of the Community Plan Amendment for the Navajo Community Plan. The amended Grantville CPIOZ-Type A will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation, and allow for increased density of up to 109 dwelling-units per acre~~, for a maximum total of approximately up to 4,594 dwelling units,~~ in the area surrounding the existing Grantville Trolley Station when certain criteria are met. Both areas will follow the CPIOZ guidance per Land Development Code Chapter 13, Article 2, Division 14.

3.2 Project Objectives

In accordance with CEQA Guidelines Section 15124, this document identifies the following primary objectives that support the purpose of the project, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in the EIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary.

- Promote planning, redesign, and development of areas which are underutilized;
- Promote Transit Oriented Development (TOD) within walking distance to the Grantville Trolley Station, with a mix of residential, commercial, and industrial uses that would be designed for the pedestrians without excluding automobiles;
- Promote a multi-modal transportation strategy including walkable and bicycle-friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout the community;
- Provide more market-rate and affordable housing opportunities consistent with a land use pattern that promotes infill development and socioeconomic equity;

- Provide an incentive for development within the Grantville CPIOZ by streamlining the permit processing requirements in order to ensure a less costly and time-intensive process;
- Allow for the ability to reduce vehicle miles traveled and reduce associated air pollution and GHG emissions;
- Conserve resource lands and open space; and,
- Facilitate implementation of the San Diego River Park Master Plan.

3.3 Project Components

Implementation of the proposed FPA would consist of four project components, which are discussed in detail below: (1) a Community Plan Amendment (CPA) to the Navajo Community Plan; (2) including an amendment to the Community Plan Implementation Overlay Zone (CPIOZ) in the Navajo Community Plan; (3) the processing of rezones to implement the plan amendment; and, (4) an update to the Public Facilities Financing Plan (PFFP) for the Navajo planning area. ~~**(1)** an amendment to the Navajo Community Plan; **(2)** the processing of rezones to implement the amendment; **(3)** a Community Plan Implementation Overlay Zone (CPIOZ) amendment; and, **(4)** an update to the Public Facilities Financing Plan (PFFP) for the Navajo community~~.

3.3.1 Community Plan Amendment

In order to implement the proposed FPA changes to the Navajo Community Plan, the Plan must be formally amended. To process the amendment, it was reviewed by the Navajo Community Planning Group with a recommendation to the Planning Commission regarding approval; approved by the Planning Commission; and, subsequently, approved by the San Diego City Council.

The Community Plan Amendment specifically focuses on the physical area shown in Figure 3-1 as Existing Grantville CPIOZ-Type A. The specific properties that are shown within the Grantville CPIOZ-Type A boundary are currently identified as CPIOZ-Type A under the current Navajo Community Plan. The Community Plan Amendment provides the community's vision for Grantville, policies, and 28 supplemental design regulations that focus on encouraging TOD which will minimize an over-reliance on automobiles and emphasize pedestrian orientation and proximity to public transit. The supplemental development regulations reinforce the concept of an interconnection between development projects and the surrounding public transit system through significant physical and functional integration of project components, site design, and the provision of pedestrian and bicycle infrastructure. As development and redevelopment occur, the Community Plan Amendment envisions an elaborate pedestrian and bicycle circulation network linking new mixed-use development to the existing Grantville Trolley Station. The draft Community Plan Amendment can be found at the following web address:

http://www.sandiego.gov/planning/community/cpu/grantvillemasterplan/index.shtml

3.3.2 Community Plan Implementation Overlay Zones (CPIOZ)

The second part of the proposed FPA is the implementation of the Community Plan Amendment through the CPIOZ process. Within the proposed FPA, there is both existing CPIOZ Type-A and CPIOZ Type-B areas under the current Navajo Community Plan. These boundaries are not changing. The purpose of a CPIOZ overlay is to provide supplemental development regulations that are tailored to specific sites within community plan areas of the City. The intent of these regulations is to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted. Projects will be processed as either ministerial (CPIOZ Type A) or discretionary (CPIOZ Type B) actions, based on their consistency with the CPIOZ. Future development on properties located within the CPIOZ-A shall be consistent with the the base zone regulations and any supplemental regulations per the community plan. If consistent with both these criteria, future development projects can be processed ministerially (Type A). Development on parcels within the CPIOZ Type A that are not consistent with the community plan or base zone regulations will be processed as a CPIOZ Type B discretionary permit. Applications for a CPIOZ Type B Permit shall meet the purpose and intent of the regulations of the underlying zone and the community plan. Compliance and exceptions from these regulations may be granted in accordance with the procedures of the Land Development Code Chapter 13, Article 2, and Division 14.

The focus of this CPIOZ section is to specifically address the CPIOZ implementation associated with the Community Plan Amendment for the Grantville CPIOZ-Type A area. The Community Plan Amendment specifically addresses the Grantville CPIOZ-Type A area by providing a vision, policies, and supplemental design guidelines. The supplemental design regulations for the CPIOZ-A area are necessary to accomplish the Transit-Oriented Development vision for Grantville and will ultimately become part of the Navajo Community Plan. The Grantville CPIOZ will define the vision and identify key design regulations to implement that vision. The San Diego River Subdistrict CPIOZ-Type B does not receive any changes under this Community Plan Amendment and stays consistent with the vision, policies, and any supplemental design guidelines identified under the 1982 Navajo Community Plan.

The CPIOZ does not exempt a project from complying with the permitting requirements found in Chapter 12, Article 6 of the Municipal Code. This includes projects that require a Planned Development Permit (PDP), Site Development Permit (SDP), Conditional Use Permit (CUP), Neighborhood Use Permit, Neighborhood Development Permit, limited uses, variances, or projects involving environmentally sensitive lands (ESL).

The implementation of the Grantvillle CPIOZ-A overlay promotes mixed-use, transit-oriented development with pedestrian and bicycle connectivity. The Grantville CPIOZ-A focuses on creating pedestrian five minute timed walking area that provide attractive commercial amenities in a desirable residential neighborhood that is directly connected to public transportation in the form the bus and the Grantville Trolley Station.

The CPIOZ includes supplemental development regulations, which would reinforce the concept of an interconnection between development projects and the surrounding public transit system through

significant physical and functional integration of project components, site design, and the provision of pedestrian and bicycle infrastructure. As development and redevelopment occurs over time within the proposed FPA area, the FPA envisions an elaborate pedestrians and bicycle circulation network linking new mixed-use developments to the existing Grantville Trolley Station.

3.3.~~2~~3 Rezoning

The Community Plan Amendment includes zoning changes as a result of the community's desire to see revitalization in Grantville. In order to achieve this vision, the current zoning is changed in the proposed FPA area. The proposed FPA area has primarily light industrial and commercial uses, but this area is primed for neighborhood revitalization and a more lively mix of uses better suited to residents and the Navajo Community. In order to achieve this vision, the following zoning changes will be implemented.

The proposed FPA will be implemented through the adoption of ~~five~~ four new zones, Community Commercial zones (CC-2-5, CC-3-6, CC-3-8, and CC-3-9) and Residential-Multiple Unit (RM-3-7). The application of these zones, together with the Community Plan Amendment and CPIOZ process, will serve as the implementation tools to achieve the neighborhood vision associated with the proposed FPA.



FIGURE 3-2

One of the key zoning changes for the proposed FPA area is highlighted in Figure 3-2 at right. The yellow area is currently zoned as Open Space Floodplain (OF-1-1) and is being rezoned as Residential Multiple Unit (RM-3-7). This area is currently developed, has extensive impervious surfaces, and is in the Grantville CPIOZ-Type A area. The blue area is currently zoned as Industrial (IL-3-1) and is being rezoned as Open Space Floodplain (OF 1-1). It is adjacent to the San Diego River, is not currently developed, and is within the San Diego River Subdistrict area.

Aside from the areas highlighted in Figure 3-2, the rezones are related to use, intensity of use, and focus on multi-modal access. All the zoning areas have previously been developed. The proposed FPA rezones the existing Agricultural-Residential (AR-1-1) to Residential-Multiple Unit (RM3-7). ~~-~~The Commercial-Visitor (CV-1-1), Community-Commercial (CC-4-2), and Industrial-Light (IL-2-1, IL-3-1)~~_~~are rezoned to Community Commercial (CC-2-5, CC-3-6, CC-3-8, CC-3-9) and Residential-Multiple Unit (RM-3-7). The mixed-use residential zones included in the proposed FPA will increase the area's capacity to meet the growing

population needs at all income levels with market-rate and affordable housing. The City of San Diego General Plan Housing Element (2013) provides policy direction to designate land for a variety of residential densities in areas in the vicinity of transit centers through the community plan update process. This proposed FPA encourages resource efficient development by clustering activities and services to establish a balance of housing, jobs, shopping, and recreation around the Grantville Transit Station. Table 3-1 gives the acreage of the existing and proposed zones within the proposed FPA and highlights the percentage each existing zone occupied and the percentage that each new zone will occupy. Figure 3-3 depicts the existing zoning and Figure 3-4 depicts the proposed zoning.

Table 3-1
Acreage of Existing and Proposed Zones in the Project Area

Category	Zoning	Acres (Existing)	% of Community	Acres (Proposed)	% of Community
Agricultural-Residential	AR-1-1	3.9	1.39%	0	0%
Community Commercial	CC-1-3	29.49	10.55%	0	0%
	CC-2-5	0	0%	45.98	16.45%
	CC-3-6	0	0%	60.42	21.61%
	CC-3-8	0	0%	74.99	26.82%
	CC-3-9	0	0%	42.15	15.08%
	CC-4-2	19.6	7.01%	0	0%
Commercial-Visitor	CV-1-1	3.92	1.40%	0	0%
Industrial-Light	IL-2-1	10.62	3.80%	0	0%
	IL-3-1	192.87	68.99%	0	0%
Open Space-Floodplain	OF-1-1	19.17	6.86%	21.77	7.79%
Residential-Multiple Unit	RM-3-7	0	0%	34.26	12.25%
	TOTAL	**279.57**	100.00%	**279.57**	100.00%

Source: City of San Diego, 2014;

Table 3-1
Acreage of Existing and Proposed Zones in the Project Area

Category	Zoning	Acres (Existing)	% of Community	Acres (Proposed)	% of Community
Agricultural-Residential	AR-1-1	3.01	1.3%	0	0.0%
Community Commercial	CC-1-3	3.22	1.4%	0	0.0%
	CC-2-5	0	0.0%	30.39	13.4%
	CC-3-6	0	0.0%	20.13	8.9%
	CC-3-8	0	0.0%	63.37	27.9%
	CC-3-9	0	0.0%	34.02	15.0%
	CC-4-2	8.28	3.6%	0	0.0%
Commercial-Visitor	CV-1-1	1.75	0.8%	0	0.0%
Industrial-Light	IL-2-1	8.16	3.6%	0	0.0%
	IL-3-1	154.07	67.9%	0	0.0%
Open Space-Floodplain	OF-1-1	7.21	3.2%	9.45	4.2%
Residential-Multiple Unit	RM-3-7	0	0.0%	28.34	12.5%
Right of Way		41.3	18.2%	41.3	18.2%
	227	100.00%	**227**	100.00%	**227**

Source: City of San Diego, ~~2014~~ 2015;

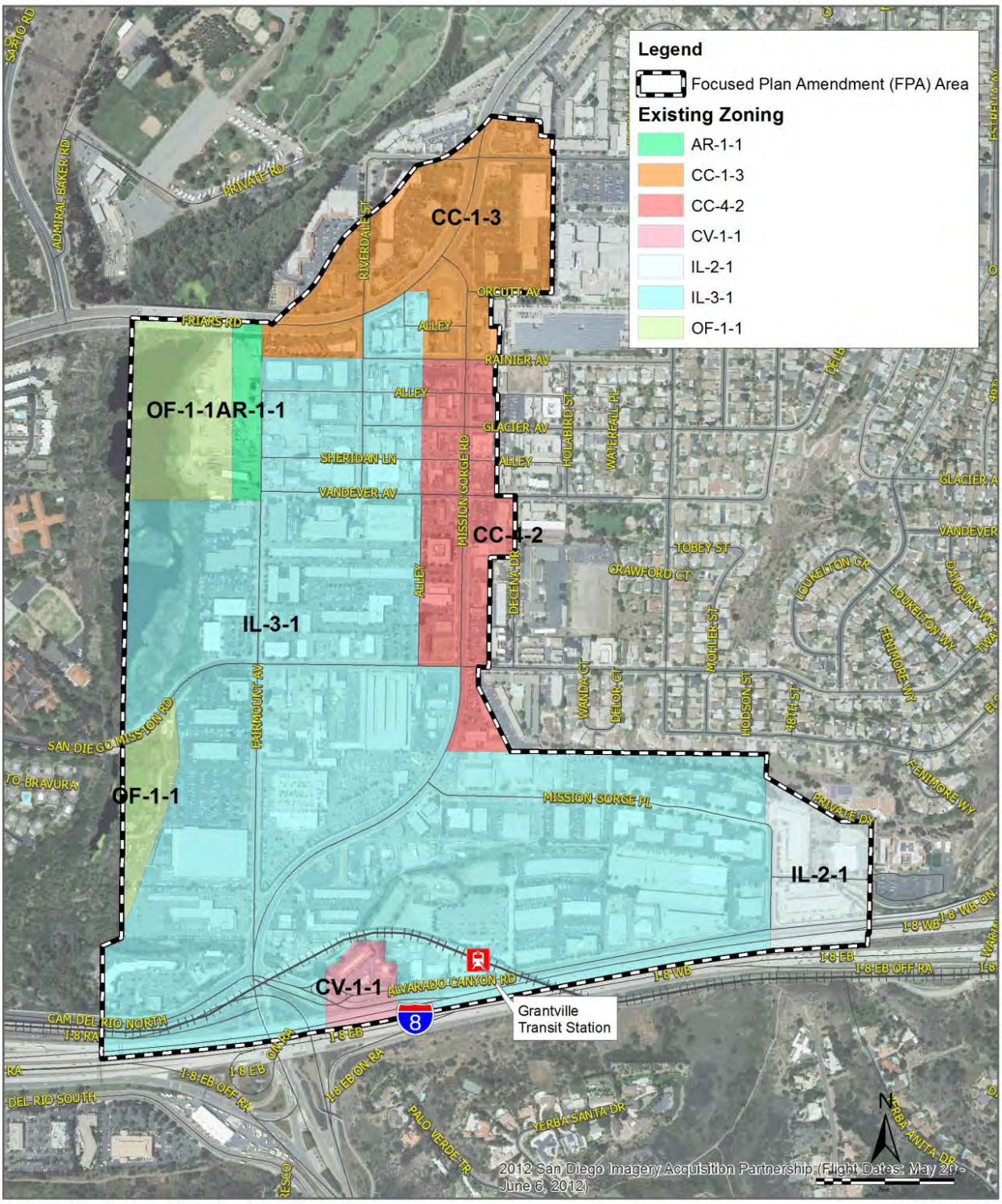
Within the proposed FPA area, ~~96~~ 82% of the proposed FPA area will be rezoned. With implementation of the proposed rezoning, 4.2 ~~8~~% would be zoned as Open Space–Floodplain, 65 ~~80~~% of the proposed FPA would be zoned Community Commercial, and approximately 12% would be zoned Residential-Multiple Unit (RM-3-7). Table 3-2 provides a description of the new zones proposed for the rezoning. Community Commercial zones, CC-2-5, CC-3-6, CC-3-8, and CC-3-9~~,~~ are not currently recognized zoning designations in the municipal code but are ~~tentatively~~ scheduled for adoption to the Municipal Code by Spring 2015, contingent upon approval by the City Council. Adoption of these new proposed zones is not included as a component of this proposed FPA. Once the zones are adopted in the Municipal Code, the proposed FPA will adopt the zones in Grantville.~~(Adoption of the proposed zones will be completed by a separate action)~~

Table 3-2
New Zones Proposed

Zone	Description	Characteristics
RM-3-7	Multi-Unit Residential with Limited Commercial	• Allows residential density range of 30-43 du/ac • Pedestrian orientation
CC-2-5*	Community Commercial with no Residential	• High-intensity community-serving commercial • Residential prohibited • Pedestrian orientation
CC-3-6*	Community Commercial with Medium/High Density Residential	• Allows residential density range of 30-43 du/ac • Pedestrian orientation • Heavy commercial
CC-3-8*	Community Commercial with High Density Residential	• Allows residential density range of 44-73 du/ac • Pedestrian orientation
CC-3-9*	Community Commercial with High Density Residential	• Allows residential density range of 44-109 du/ac • Pedestrian orientation • Trolley station orientation

Source: City of San Diego, 2014. *Zone not yet adopted to the Municipal Code.

Over time, development in accordance with the proposed zones would reduce the number and severity of incompatible uses within the community. In addition, implementation of future projects consistent with the proposed zoning is expected to facilitate creation of a transit-oriented development that will allow for healthier, pedestrian and bicycle friendly, mixed use development with close proximity to the Grantville Trolley Station.



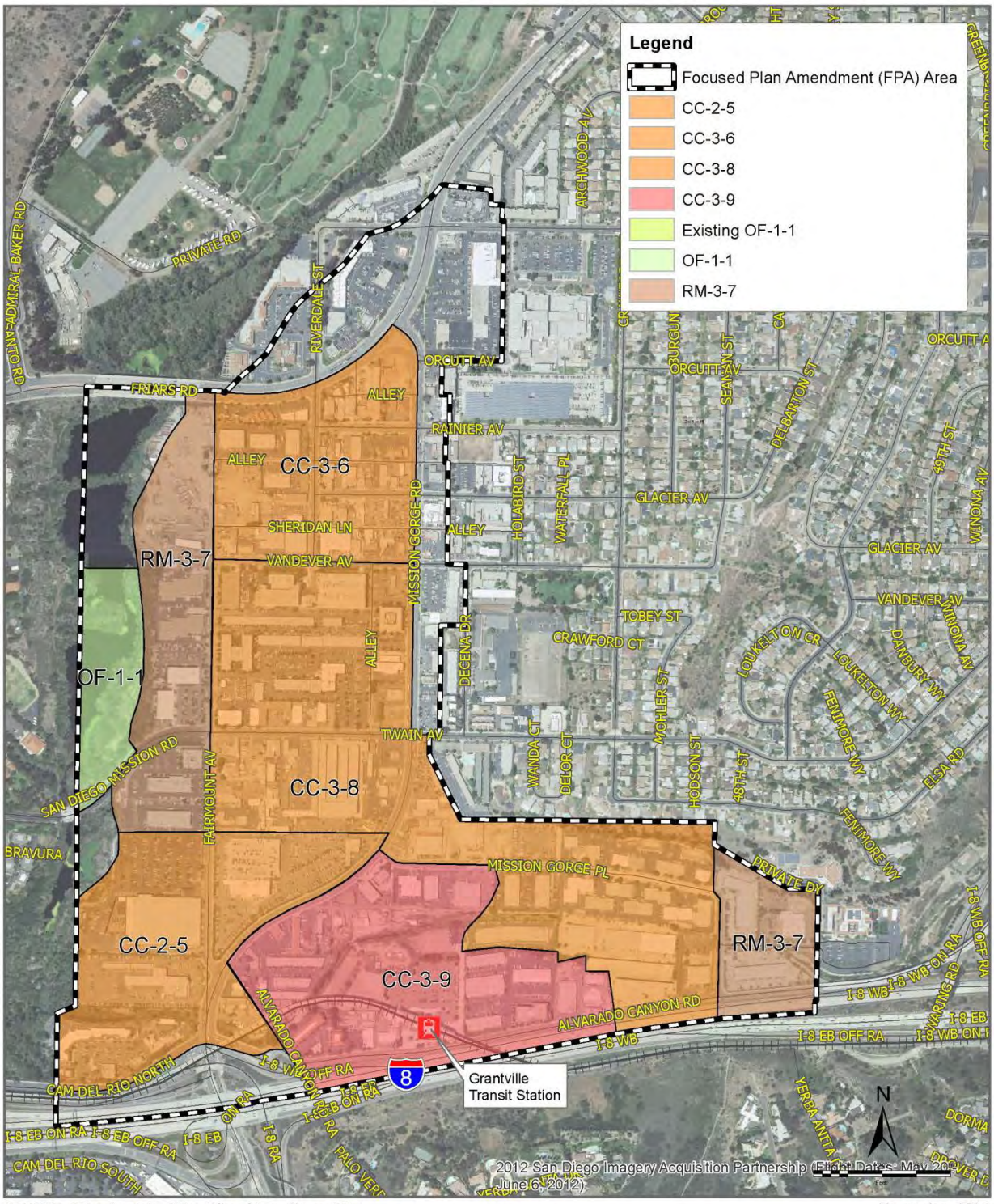
SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Existing Zoning

FIGURE
3-3



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Proposed Rezoning
Within the Study Area

FIGURE
3-4

3.3.3 Community Plan Implementation Overlay Zones (CPIOZ)

The purpose of a CPIOZ overlay is to provide supplemental development regulations that are tailored to specific sites within community plan areas of the City. The intent of these regulations is to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted. Projects will be processed as either ministerial (CPIOZ Type A) or discretionary (CPIOZ Type B) actions, based on their consistency with the CPIOZ. Future development on properties located within the CPIOZ A shall be consistent with the the base zone regulations and any supplemental regulations per the community plan. If consistent with both these criteria, future development projects can be processed ministerially (Type A). Development on parcels within the CPIOZ Type A that are not consistent with the community plan or base zone regulations will be processed as a CPIOZ Type B permit. Applications for a CPIOZ Type B Permit shall meet the purpose and intent of the regulations of the underlying zone and the community plan. Compliance and exceptions from these regulations may be granted in accordance with the procedures of the Land Development Code Chapter 13, Article 2, and Division 14.

The CPIOZ does not supersede exempt a project from complying with the permitting requirements found in Chapter 12, Article 6 of the Municipal Code. This includes projects that require a Planned Development Permit (PDP), Site Development Permit (SDP), Conditional Use Permit (CUP), Neighborhood Use Permit, Neighborhood Development Permit, limited uses, variances, or projects involving environmentally sensitive lands (ESL).

The third part of the proposed FPA is the implementation of the Community Plan Amendment through the CPIOZ process. Within the proposed FPA, there is both existing CPIOZ Type A and CPIOZ Type B areas under the current Navajo Community Plan. These boundaries are not changing. The focus of this CPIOZ section is to specifically address the CPIOZ implementation associated with the Community Plan Amendment for the Grantville CPIOZ Type A area. The Community Plan Amendment specifically addresses the Grantville CPIOZ Type A area by providing a vision, policies, and supplemental design guidelines. The supplemental design regulations for the CPIOZ A area are necessary to accomplish the Transit Oriented Development vision for Grantville and will ultimately become part of the Navajo Community Plan. The Grantville CPIOZ will define the vision and identify key design regulations to implement that vision. The San Diego River Subdistrict CPIOZ Type B does not receive any changes under this Community Plan Amendment and stays consistent with the vision, policies, and any supplemental design guidelines identified under the 1982 Navajo Community Plan.

The implementation of the Grantvillle CPIOZ A overlay promotes mixed use, transit oriented development with pedestrian and bicycle connectivity. The Grantville CPIOZ A focuses creating pedestrian walking sheds that provide attractive commercial amenities in a desirable residential neighborhood that is directly connected to public transportation in the form the bus and the Grantville Trolley Station.

The CPIOZ includes supplemental development regulations, which would reinforce the concept of an interconnection between development projects and the surrounding public transit system through significant physical and functional integration of project components, site design, and the provision of

~~pedestrian and bicycle infrastructure. As development and redevelopment occurs over time within the proposed FPA area, the FPA envisions an elaborate pedestrians and bicycle circulation network linking new mixed-use developments to the existing Grantville Trolley Station.~~

3.3.4 Public Facilities Financing Plan Update

The City of San Diego maintains a Public Facilities Financing Plan (PFFP) for the Navajo Community Planning Area, which will be updated concurrently with the proposed FPA. The PFFP includes the community's boundary, a summary of the community's existing public facilities and future needs, a financing strategy, a Development Impact Fee (DIF) determination, and impact fee schedule. The DIF incorporates community build-out assumptions and cost assumptions for the proposed community-serving facilities. DIFs are collected to mitigate the impact of new development through provision of a portion of the financing needed for these identified public facilities and to maintain existing levels of service for the community. The PFFP sets forth the major public facilities needs specific to the Navajo community with respect to transportation (i.e., streets, storm drains, traffic signals), libraries, park and recreation facilities, and fire stations. The amendment to the Navajo PFFP is to assure that public facility demands are adjusted to account for changes in future land use that will result from the proposed increase in residential density in the Grantville neighborhood. The PFFP amendment is proposed for adoption concurrently with the proposed amendment to the Navajo Community Plan and certification of the PEIR. Future decisions as to prioritization of improvements will be made based on community input, need, and available funding.

3.4 Development Potential

To estimate environmental effects of the proposed FPA, land development expected to occur in the proposed FPA area over the next 30 years has been estimated based on currently adopted Community Plan land uses, and also with consideration of current and projected market trends related to various development types in the City. Table 3-3 provides floor area estimates of the existing development of commercial and industrial uses within the proposed FPA area and the estimated increase in development potential anticipated as a result of implementation of the proposed FPA. Assuming development of currently vacant parcels and redevelopment of existing developed parcels according to the proposed land uses, a shift in the type and intensity of development is anticipated to occur in the proposed FPA area over the next 30 years.

TABLE 3-3
Commercial and Industrial Development Potential

Land Use	Floor Area (Existing)	Floor Area (Proposed Change)	Floor Area (Proposed New Total)
Commercial Office	390,000 sf	+536,200 sf	926,500 sf
Strip Commercial	622,300 sf	-147,900 sf	474,400 sf
Commercial (Total)	1,012,600 sf	+388,300 sf	1,400,900 sf
Industrial (Total)	1,393,500 sf	-1,143,500 sf	250,000 sf

Source: City of San Diego, 2014.



SOURCE: 2014 SanGIS, 2014; City of San Diego, 2014 November 2014

Grantville Focused Planned Amendment

Community Plan Implementation Overlay Zones (CPIOZ)

FIGURE 3-5

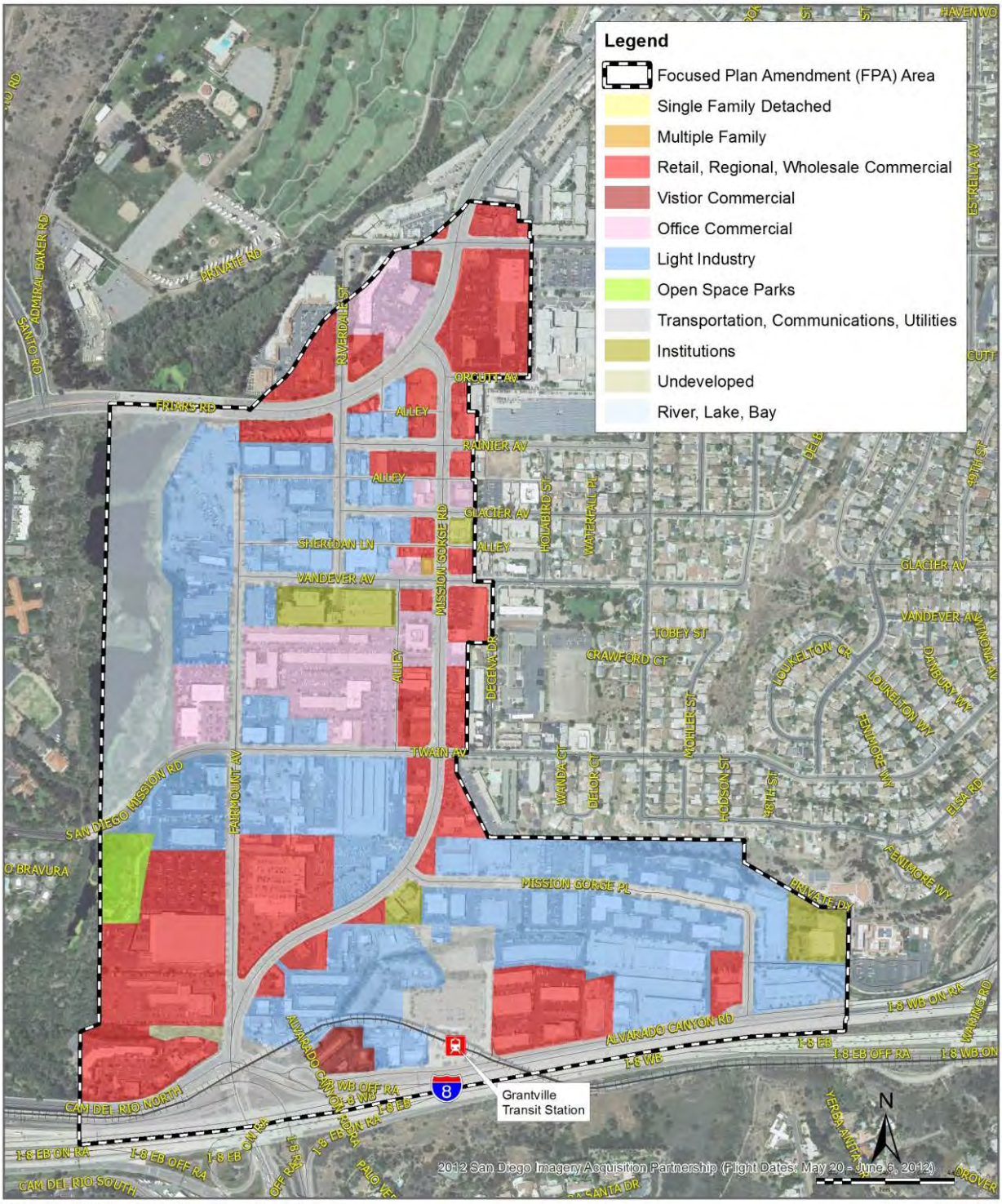
It is estimated that the floor area of commercial office land uses would increase by 536,200 square feet (sf), whereas strip commercial uses would decrease by 147,900 sf, resulting in a net increase of 388,300 sf of commercial land uses overall. Industrial development would be reduced from 1,393,500 sf to a new total of 250,000 sf. Residential dwelling units (DU) would increase from 101 to a total of 8,376.

Existing land use was quantified through a comprehensive land use survey of the proposed FPA area of existing land use type and building development on each individual parcel of the proposed FPA area. The development estimates provided in Table 3-3 are subject to variation because of the range of options available for many sites, the long development period being considered (i.e., 30 years), and the inability to predict new market forces that may decide development potential over the life of the Community Plan. The estimates are based on current and projected market trends related to various development types in the City. Generally, a Floor Area Ratio (FAR) range between .34 and .40 is assumed for most non-residential uses. It should be noted that existing land use regulations in the proposed FPA area allow an FAR up to 2.0; however, the application of the .34 to .40 range is considered a more realistic estimate of future growth based on land use and infrastructure (e.g., roadway) capacities in the proposed FPA area. Figure 3-~~5~~ 6 depicts the existing land uses within the proposed FPA area, Figure 3-~~6~~ 7 depicts the current Navajo Community Plan's planned land use, and Figure 3-8~~7~~ depicts the FPA's proposed land use.

3.5 Summary of Proposed FPA Actions

Discretionary actions are those actions taken by an agency that call for the exercise of judgment in deciding whether to conditionally approve, deny or delay a project. As discussed in Chapter 1.0, Introduction, the following discretionary approvals by the City of San Diego comprise the project analyzed within this PEIR, and referred to herein as the "proposed FPA":

- Certification of this ~~PEIR~~FEIR
- Focused Plan Amendment to the Navajo Community Plan and corresponding amendment of the General Plan
- Rezoning
- Community Implementation Overlay Zone Amendment
- Navajo Public Facility Financing Plan (PFFP) Update



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Existing Land Use

FIGURE
3-6



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014

November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Navajo Community Plan Land Use

FIGURE
3-7



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014

November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Proposed Land Use Plan

FIGURE
3-8

The Planning Commission will review the discretionary actions listed above associated with the proposed FPA and provide a recommendation to the City Council, who will consider and make a decision on the proposed FPA and associated discretionary actions.

3.6 Administration of Proposed FPA

Plan implementation would require subsequent approval of public or private development proposals (referred to as "future development" in this PEIR) through both ministerial and discretionary reviews to carry out the land use plan and policies in the proposed FPA. 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 may be required for future implementing activities is provided in Table 3-4.

Table 3-4
Potential Future Discretionary Actions Under the Proposed FPA

City of San Diego: • Tentative Maps • Planned Development Permits‡ • Site Development Permits‡ • Establishment of Public Facilities Financing Mechanisms • Conditional Use Permits • Neighborhood Use Permits • Street Vacations, Release of Irrevocable Offers of Dedication, and Dedications • Water and sewer infrastructure and road improvements
State of California Actions: • Caltrans Encroachment Permits • Section 1602/1603 Streambed Alteration Agreement • Water Quality Certification Determination for Compliance with Section 401
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 powerline relocations or undergrounding

NOTE: Projects within the designated boundaries of the Grantville CPIOZ as depicted in Figure 3-5 and consistent with the proposed FPA land use and designated zoning will require ministerial approval only.

4.0 HISTORY OF PROJECT CHANGES

The proposed FPA was developed through a series of design charrettes and several years of monthly stakeholder meetings in the Navajo community. Initially, the Grantville area, referred to as Subarea A, was one of several subareas within the Navajo community considered for a land use plan amendment. Through the charrette process and extensive public meetings, several alternative land use scenarios were developed in 2009 and 2010. Ultimately, at the September 2010 workshop, the City of San Diego with community input, decided to focus specifically on Subarea A (hereby referred to as the proposed FPA area), and three alternative land use scenarios were identified, and referred to as Alternative D, Alternative EF, and Alternative G.

Through an extensive public meeting process and preliminary analysis of the three land use alternatives, the Grantville Stakeholders Committee (GSC) selected Alternative D as the CEQA project to be analyzed in this PEIR at the January 10, 2011 GSC meeting. A description of this alternative is provided in Chapter 3.0 Project Description of this PEIR. Additional alternatives that would reduce significant environmental impacts are identified and addressed in Chapter 11.0 of this PEIR.

On November 5, 2013, the City of San Diego released a Public Notice of Preparation (NOP) for a Draft Environmental Impact Report and Notice of an Environmental Scoping Meeting for the proposed FPA (Appendix A). The NOP described the project as the following:

> The project location, referred to as "Subarea A", is located within the former Grantville Redevelopment Project Area, located in the eastern portion of the City of San Diego in San Diego County. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles. The proposed FPA area is an approximately 379-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (including several parcels north of Zion Avenue). The southeast portion of the proposed FPA area also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A was formerly addressed by the Program EIR for the Grantville Redevelopment Project (March 2005, SCH# 2004071122) prepared for the City of San Diego Redevelopment Agency.

The proposed FPA does not affect the entire "Subarea A," 379-acre area described above. The proposed FPA components (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP, referenced in the NOP as the Navajo Facilities Finance Plan), only affect an approximately 280 acre area entirely within the Navajo Community Plan. For the Program EIR, the project description and boundary maps have been revised to only include the affected area. The components of the proposed FPA described in the NOP remain unchanged. However, the appendices were completed with the broader "Subarea A" boundary.

FIGURE 4-1

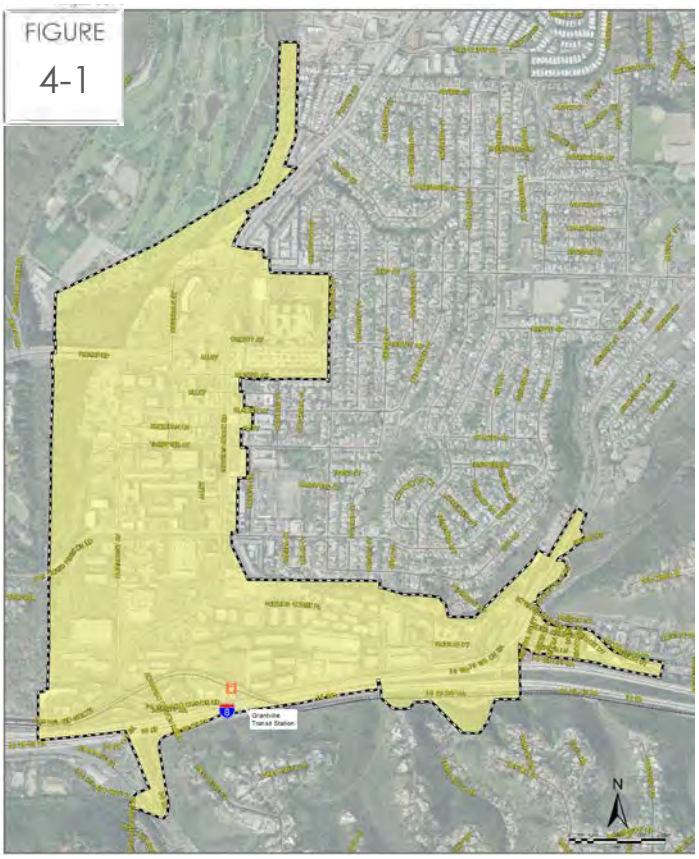
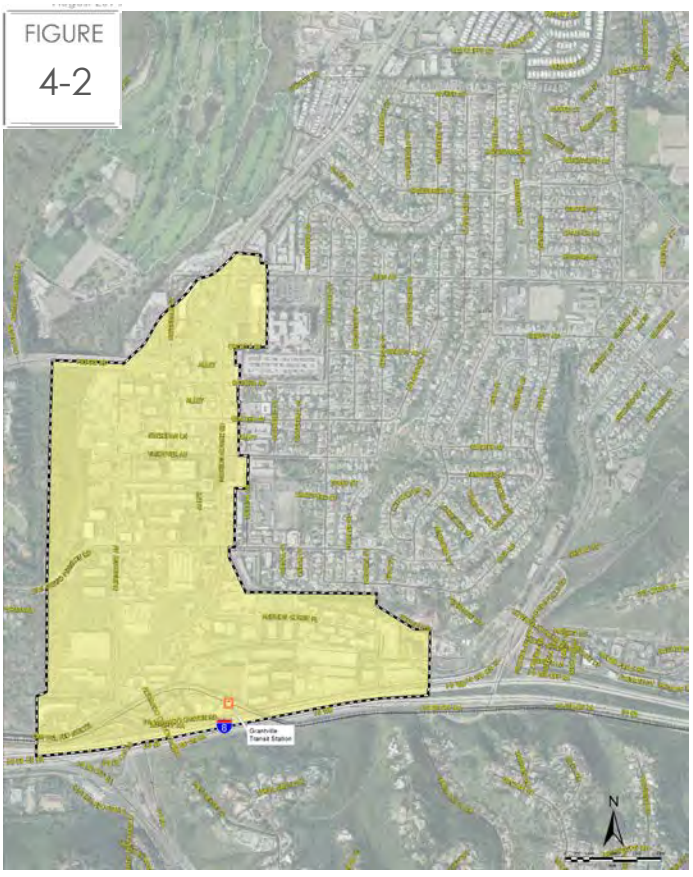


Figure 4-1 (top) highlights the project location that was released with the NOP per the November 5, 2013. Figure 4-2 (bottom) shows the updated project location, referred to as the proposed FPA area for this Program EIR.

As previously stated, the project boundary was adjusted to focus on areas of change.

Chapter 3.0 of the draft EIR included Figure 3.4, a map of the proposed rezone of the entire proposed FPA project area. A small portion on the northernmost section of Grantville was erroneously labeled as being rezoned. The final EIR includes an amended Figure 3.4 that shows the proposed zones in the entire project area. Figure 3.4 is now consistent with Figure 3.2. Table 3.1 has also been amended to reflect the correct acreage of each proposed zone within the project area.

FIGURE 4-2



5.0 Environmental Impact Analysis

The following sections contain an analysis of the potential environmental impacts that may occur as a result of the implementation of the proposed FPA. The analysis of environmental subject areas detailed in the following sections include those that were identified by the City through preliminary review, and in response to the NOP, as potentially significant.

Fifteen environmental issues are addressed in the following sections in accordance with Appendix G of the CEQA Guidelines and the City's EIR Guidelines. Each issue analysis section is formatted to include a summary of existing conditions, including the regulatory context, the criteria for the determination of impact significance, evaluation of potential project impacts, a mitigation framework, significance after mitigation for impacts identified as significant, and a conclusion.

5.1 Land Use

This section of the EIR discusses the existing land use and the consistency of the proposed FPA with applicable plans and regulations.

5.1.1 Existing Conditions

Existing land uses within and around the proposed FPA area are characterized in the context of the City of San Diego General Plan, the Navajo Community Plan, the City of San Diego Municipal Code, as well as other adopted plans and policies.

As shown on Figure 3-5, existing land uses within the proposed FPA area include a mix of commercial, office, industrial, multi-family residential, hospital, public facility, park and open space uses. Adjacent land uses include the San Diego River open space and Admiral Baker Golf Course to the west and north; single-family and multi-family residential, a public park, and school to the east; and single-family residential neighborhoods atop the open space canyon walls across the Interstate 8 corridor to the south.

5.1.1.1 Regulatory Setting

There are numerous laws, regulations, plans, policies, programs, codes, and ordinances that regulate land use development within the San Diego region. There are several existing local plans applicable to the proposed FPA and development of future projects. The following provides a discussion of the applicable plans and development regulations, including the City of San Diego General Plan, Navajo Community Plan, City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan, San Diego River Park Master Plan, Montgomery Field Airport Land Use Compatibility Plan (ALUCP), and SANDAG Regional Comprehensive Plan.

A. City of San Diego General Plan

As required by State planning and zoning law, the City has developed a "comprehensive, long-term plan for the physical development of the City, and of any land outside its boundaries which bears relation to its planning" (State of California, 2000). For the City of San Diego, this plan is known as the General Plan (City of San Diego, 2008). The General Plan consists of development policies, in the form of Findings, Goals, Guidelines, Standards, and Recommendations for a variety of land use elements. The General Plan also references a series of community plans, which are intended to provide more area-specific guidance on development in the communities of San Diego. As depicted on Figure 3-7 of this EIR, the General Plan's planned land use designations for the proposed FPA area include Mixed Use, Arterial Commercial, Neighborhood Shopping Center, Multifamily Residential, Single Family Detached, Light Industry – General, Open Space, and Hospital.

B. City of San Diego Land Development Code

Zoning for property located in the City of San Diego is governed by the City's Land Development Code (LDC). Chapter 13, Article 2, Division 14 of the code identifies areas within adopted community plans that require supplemental development regulations or processing of a development permit, called a Community Plan Implementation Overlay Zone or CPIOZ. Zoning within these areas is identified within the

adopted community plan, ~~and~~ along with supplemental design regulations. ~~have been incorporated by ordinance into this overlay zone.~~ A rezone ordinance is required to modify the zoning within a CPIOZ area, ~~a community plan amendment is required.~~ The CPIOZ is further described in the Community Plan and will be administered once the rezone is adopted.

The FPA area is completely within the CPOIZ of the Navajo Community Plan. As shown on Figure 3-2, existing zoning within the proposed FPA and CPOIZ area includes Commercial, Industrial, Residential, Open Space, and Agricultural-Residential. Generally, the southern portion of the proposed FPA area along Fairmount Avenue, the southern end of Mission Gorge Road, and north of Alvarado Canyon Road is zoned Industrial-Light. Closer to the northern portion of the proposed FPA area, along Mission Gorge Road and Friars Road, there is Commercial-Community zoning. At the far eastern end of the proposed FPA area, near Waring Road, there are areas zoned Commercial-Office, Commercial-Visitor, Residential Single-Family, Residential Multi-Family, and Open Space-Parks. Portions of the western boundary of the proposed FPA area along the San Diego River corridor are zoned Open Space-Floodplain.

C. Navajo Community Plan

The proposed FPA area is located within the City of San Diego's Navajo Community Planning Area, as shown on Figure 3-1 of this EIR. The Navajo area, encompassing approximately 14 square miles, lies roughly north of Interstate 8, northwest of the city of La Mesa, west of the cities of El Cajon and Santee, and southeast of the San Diego River. In addition to Grantville, the Navajo area includes the communities of Allied Gardens, Del Cerro, and San Carlos.

A wide variety of land uses are represented in the western portion of the Navajo community, including detached and attached residential in Allied Gardens, and some significant commercial and light industrial centers in Grantville, situated along both sides of Mission Gorge Road. The central and eastern portions of the Navajo community are primarily residential in character in the Del Cerro and San Carlos neighborhoods. Pockets of neighborhood and community-serving commercial are situated at the intersections of major transportation corridors, such as Navajo Road at the intersections of Jackson Drive and Lake Murray Boulevard.

As shown on Figure 3-6 of this EIR, the Navajo Community Plan currently designates all of the proposed FPA area as industrial, commercial, mixed use, and open space. The southern end of the proposed FPA area, south of San Diego Mission Road/Twain Avenue, and to the east along Mission Gorge Place, is mostly designated industrial. There are also industrial uses designated north of Vandever Avenue between Fairmount Avenue and Mission Gorge Road. The Navajo Community Plan designates commercial uses near the intersection of Friars Road and Zion Avenue, in addition to along the east side of Mission Gorge Road, and at the northeast corner of the intersection of Fairmount Avenue and Alvarado Canyon Road. Mixed-use is designated for the block south of Vandever Avenue and north of Twain Avenue, between Fairmount Avenue and Mission Gorge Road. Open space uses are designated for the San Diego River at the western edge of the proposed FPA area, north of San Diego Mission Road.

The primary goal of the Navajo Community Plan is to "retain the residential character of the area" while providing basic services which enhance the day-to-day lives of its residents, such as police and fire protection and open space amenities. The plan recognizes the delicate balance between the community and the San Diego River. Much of the community's urban runoff during storm events is conveyed to the river and the occasional flooding of the river impacts future land use planning in the floodplain. The plan calls for a continuous trail along the San Diego River, and states that all structures within 150 feet of the 100-year floodway shall provide at least one pedestrian access path to the main trail.

The City of San Diego Parks and Recreation Department indicates that the Navajo Community Planning Area currently has an "active recreation" park acreage deficit of nearly 21 acres, which is projected to reach almost 27 acres by the year 2030.

The Navajo Community Plan was adopted by the City Council on July 29, 1982, with the Grantville Amendment adopted on April 4, 1989.

D. City of San Diego Multiple Species Conservation Program/Multi-Habitat Planning Area

The City of San Diego MSCP Subarea Plan was prepared pursuant to the general outline developed by the USFWS and CDFW to meet the requirements of the California Natural Communities Conservation Plan Act of 1992. The San Diego County MSCP is a comprehensive habitat conservation planning program that addresses multiple species habitat needs and the preservation of native vegetation communities in the San Diego Region. As such, the MSCP Subarea Plan serves as the adopted Habitat Conservation Plan for the City. The Subarea Plan is consistent with the County MSCP plan and qualifies as a standalone document to implement the City's portion of the MSCP preserve (City of San Diego, 1997).

The City of San Diego MHPA was developed by the City in cooperation with USFWS and CDFW, property owners, developers, and environmental groups. The Preserve Design Criteria contained in the County MSCP plan and the City Council adopted criteria for the creation of the MHPA were used as guides in the development of the City's MHPA. The MHPA delineates core biological resources areas and corridors targeted for conservation. Within the MHPA, limited development may occur (City of San Diego, 1997).

In several peripheral areas in the Program Area, particularly at its western boundary along the San Diego River, the proposed FPA area contains and is adjacent to MHPA land, although no developed land is included or proposed to be included in the MHPA. This urban habitat area contributes to the MSCP by providing habitat for native species, shelter and forage for migrating species, and linkages between biological core areas capable of supporting a diverse range of native species. The location of MHPA land relative to the project site is shown in Figure 5.1-1.

In addition, any development adjacent to the MHPA must comply with the MHPA land use adjacency guidelines, which are summarized as follows:

- **Drainage –** All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the

release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.

- **Toxics –** Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.
- **Lighting –** Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.
- **Noise –** Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species.
- **Barriers –** New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.
- **Invasives –** No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.
- **Brush Management –** New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of the homeowners association or other private party. For existing and approved projects, the brush management zones, standards and locations, and clearing techniques will not change from those required under existing regulations.
- **Grading/Land Development –** Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

E. San Diego River Park Master Plan

The San Diego River Park Master Plan (City of San Diego, 2013) is a policy document that provides recommendations and guidelines to be considered in concert with land use decisions along the San Diego River. The goal of the plan is to create a continuous river park linking all 17.5 miles of the river within the City, and ultimately from its headwaters near Julian to the Pacific Ocean.

The plan divides the San Diego River into six segments, or reaches, that are based on topographic characteristics and river conditions. The six reaches include the Estuary (Pacific Ocean to I-5), the Lower

Valley (I-5 to I-15), the Confluence (I-15 to Friars Road Bridge), the Upper Valley (Friars Road Bridge to Mission Trails Regional Park), and the Plateau (east of Mission Trails to the City of Santee). The reaches of the San Diego River within the proposed FPA area are the Confluence and Upper Valley Reach.

Each of the six reaches has its own distinct set of policy recommendations for development within the River Corridor Area and the River Influence Area. The Master Plan defines the River Corridor Area as all areas within 35 feet of the 100-year floodway (as defined by the Federal Emergency Management Agency [FEMA], as shown on Figure 5.1-2), and defines the River Confluence Area as areas within 200 feet of the River Corridor Area. The Master Plan recommendations describe general and specific strategies for addressing the ecological health of the river, facilitating human recreational use, use as an amenity for economic development, and how to reorient development toward the river to create value and provide identity for the San Diego River Park.

The Confluence reach is the area between I-15 and Friars Road Bridge, and includes the point where Alvarado Creek joins the San Diego River at the southwest corner of the proposed FPA area. Closer to the northern portion of the proposed FPA area, the reach is partially enclosed by a steep canyon wall on the west side of the river and industrial uses to the east. Encroaching development on the east and I-8 to the south further emphasize the sense of enclosure. The river corridor is also constrained by a series of old gravel mine ponds below the Friars Road bridge that impede the normal hydrologic activities of the river system. In this area, extensive exotic vegetation infestation is present both in the ponds and in the river.

The Upper Valley reach extends from the Friars Road bridge north to the western boundary of Mission Trails Regional Park, and includes the area located north of the Friars Road bridge, including a small portion of Admiral Baker Golf Course along the west bank of the San Diego River.

The Upper Valley is characterized by three hydrologic conditions: 1) the gravel extraction mine bordering Mission Trails Regional Park has channelized the river and disrupted habitat continuity through and across the mine site; 2) the river corridor through the mine site is infested with exotic plant species; and, 3) the river channel is interrupted by a series of ponds that obstruct the natural sediment transport processes of the stream.

F. Montgomery Field Airport Land Use Compatibility Plan

The Montgomery Field 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 proposed FPA area is located 2.25 miles from Montgomery Field, and is located entirely within Review Area 2 of Montgomery Field's Airport Influence Area (AIA). The proposed FPA area is located 5.5 miles from the San Diego International Airport (SDIA), but is not located within its AIA.

The Montgomery Field AIA is defined as "the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those

uses." To facilitate implementation and reduce unnecessary referrals of projects to the Airport Land Use Commission (ALUC), the AIA is divided into Review Area 1 and Review Area 2.

Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight areas depicted on the associated maps in the Montgomery Field ALUCP. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate. Within Review Area 2, only land use actions for which the height of objects is an issue are subject to ALUC review.

The Montgomery Field ALUCP requires compliance with Federal Aviation Regulation (FAR) Part 77, *Objects Affecting Navigable Airspace*. These regulations require that the FAA (Federal Aviation Administration) be notified of any proposed structure which could affect the navigable airspace around an airport. According to FAR Part 77, this includes any proposed construction that would exceed 200 feet above ground level, or any proposed construction within 20,000 feet of an airport which exceeds a 100:1 surface from any point on the runway (FAA, 2012). Any future development within the proposed FPA area would be reviewed for compliance with FAR Part 77.

G. SANDAG Regional Comprehensive Plan

The Regional Comprehensive Plan (RCP), prepared by the San Diego Association of Governments (SANDAG), is the strategic planning framework for the San Diego region. The scope of the RCP extends beyond the borders of San Diego County and considers planning and growth underway in Imperial, Orange and Riverside Counties, as well as in Baja California, Mexico. The policy recommendations contained in the RCP were heavily influenced by principles of sustainability and smart growth. A major emphasis of the RCP is to improve connections between land use and transportation. As such, the RCP identifies "Smart Growth Opportunity Areas" where compact, mixed-use, pedestrian-oriented development either exists now, is currently planned, or has the potential of future incorporation into local land use plans. SANDAG and local agencies designated the "Smart Growth Opportunity Areas" on a "Smart Growth Concept Map," which is being used as a planning tool to communicate with local jurisdictions and infrastructure providers about where smart growth should happen (SANDAG, 2004).

H. Historical Resources Regulations

The purpose of the City's Historical Resources Regulations (HRR) (LDC Sections 143.0201 through 143.0280) is to protect, preserve, and, where damaged, restore the historical resources of San Diego. Historical resources include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties (TCPs). These regulations are intended to protect historical resources quality, and to protect the educational, cultural, economic, and general welfare of the public, while maintaining sound historical preservation principles and the rights of property owners.

As discussed in Section 5.9 of this PEIR, Historical Resources, several known historical resources exist within the CPU area.



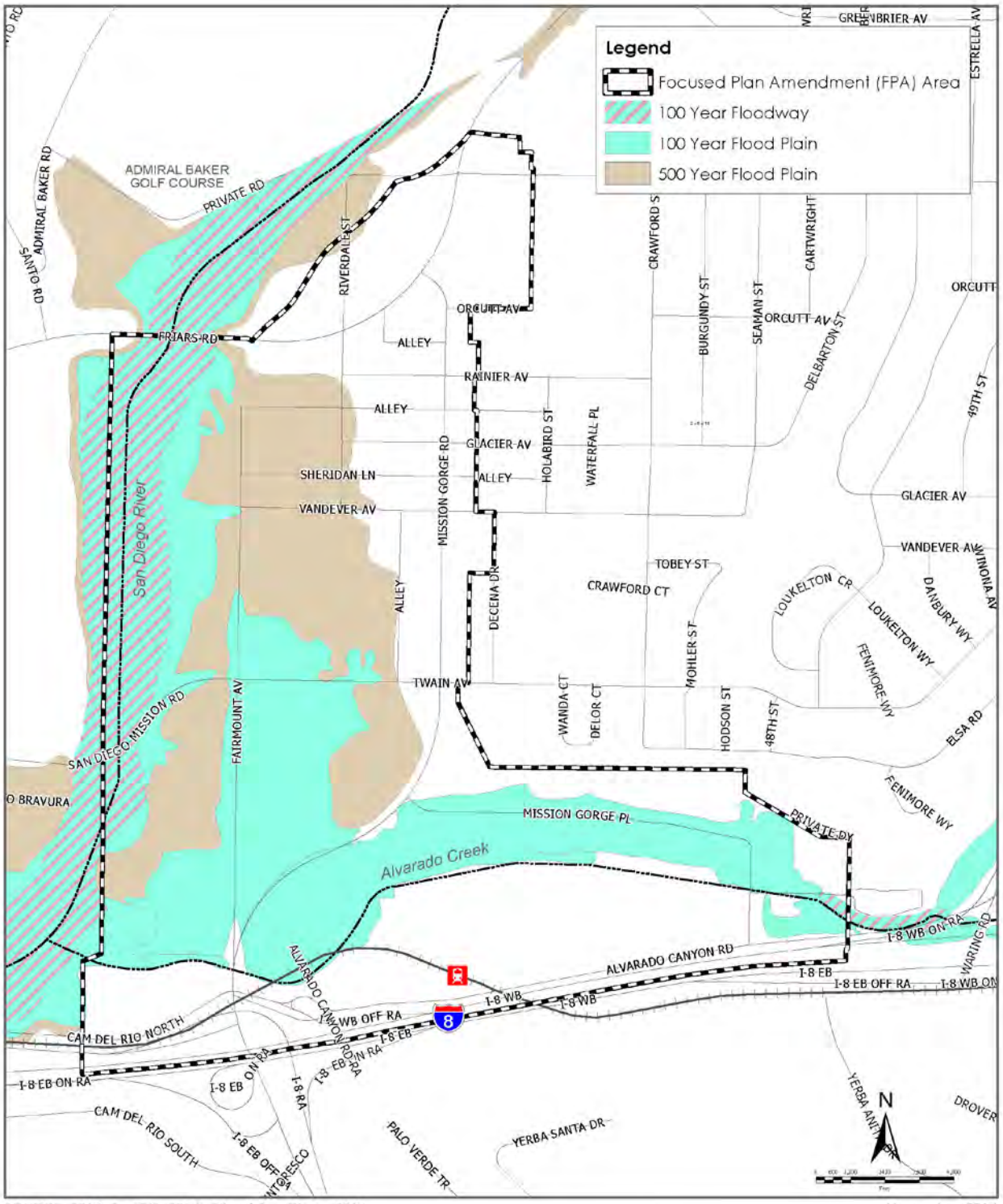
SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Multi-Habitat Planning Area (MHPA)

FIGURE 5.1-1



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

FEMA Special Flood Hazard Areas

FIGURE 5.1-2

5.1.2 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact with regard to land use would occur if the proposed FPA would result in:

- *Inconsistency/conflict with the environmental goals, objectives, or guidelines of a community or general plan;*
- *Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur;*
- *Substantial incompatibility with an adopted plan;*
- *Development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use;*
- *Incompatible uses as defined in an airport land use plan or inconsistency with an airport's Comprehensive Land Use Plan (ACLUP) as adopted by the Airport Land Use Commission (ALUC);*
- *Inconsistency/conflict with adopted environmental plans for an area; and/or,*
- *Significantly increase the base flood elevation for upstream properties, or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.1.3 Issue 1: Consistency with Adopted Plans

Issue 1: Would the proposed FPA conflict with any adopted goals, objectives, and recommendations of the City of San Diego General Plan, the Multiple Species Conservation Program (MSCP), the San Diego River Park Master Plan, the Navajo Community Plan, or any other applicable land use plan?

5.1.3.1 Impact Analysis

Section 3.0 – Project Description of this EIR describes the proposed development potential of the FPA, which includes proposed land use designation changes and new zoning. The potential conflicts with the implementation of the proposed FPA and the stated goals, objectives and recommendations of applicable land use plans are addressed on a plan-by-plan basis, as follows.

A. City of San Diego General Plan

The proposed FPA is intended to implement General Plan policies in the proposed FPA area through the provision of community-specific recommendations that would further citywide goals and policies, address community needs, and guide zoning. The General Plan contains policies to guide future growth and development into sustainable development patterns while emphasizing the diversity of San Diego's

distinctive communities. The General Plan promotes the City of Villages strategy through mixed-use villages connected by high-quality transit.

The General Plan identifies Grantville as part of a Subregional Employment Area. According to Appendix C, EP-3:

> The Morena and Grantville areas originally developed with industrial uses, but most of the industrial uses have relocated to the northern part of the City because of their inability to compete effectively with commercial uses for land and buildings in these areas and the changing needs of modern industrial businesses for larger more efficient industrial buildings. Despite the fact that these two areas have been historically designated for industrial uses, they have become largely commercialized and no new industrial uses are likely to occur here. In both Morena and Grantville, residential uses are appropriate in targeted locations. The application of more refined community plan land use designations can assist in separating potentially incompatible uses.

The proposed FPA will organize the transition of the community as described above by allowing mixed-use, residential, and commercial projects in the area.

The City of San Diego Housing Element, adopted by the City and certified by the California Department of Housing and Community Development in 2013, serves as a policy guide to address the comprehensive housing needs of the City of San Diego. The San Diego Association of Governments (SANDAG) has forecasted that by 2030, the City of San Diego could have a total population of approximately 1,689,000 people, which is a 29 percent increase from 2010. The Regional Housing Needs Allocation (RHNA) for the SANDAG region, adopted by the SANDAG Board in 2011, determined the City of San Diego's regional share goal for the 11-year period, January 1, 2010 – December 31, 2020, to be 88,096 housing units.

Table 5.1-1 provides an analysis of the proposed FPA's consistency with applicable City of San Diego General Plan recommendations.

TABLE 5.1-1: General Plan Consistency Analysis

A. Mobility Element	
Goals: An attractive and convenient transit system that is the first choice of travel for many of the trips made in the City. Increased transit ridership.	Consistent – The proposed FPA includes a Community Plan Implementation Overlay Zone (CPIOZ) designed to encourage transit-oriented development located near the Grantville Transit Station. This would make public transit an easier and more convenient option for Grantville commuters, and increase public transit ridership citywide.
B. Public Facilities, Services and Safety Element	
Goal: Implementation of financing strategies to address existing and future public facility needs citywide.	Consistent – As discussed in Section 5.14 (Public Services and Facilities), the proposed FPA includes an update to the Navajo Public Facilities Financing Plan (PFFP). The update will assure that ~~public facility demands~~public facilities are adjusted to account for changes in future land use anticipated with project implementation. The PFFP update will include the mandatory payment of Development Impact Fees (DIFs), required as conditions of approval on a project-specific basis.

TABLE 5.1-1: (cont'd) General Plan Consistency Analysis

Goals: Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions. Development that avoids inappropriate land uses in identified seismic risk areas.	Consistent – As discussed in EIR Section 5.5 (Geology), any future development projects within the proposed FPA area would be required to comply with all City structural engineering standards and the California Building Code, and would not be located within a seismic risk area.
C. Recreation Element	
Goals: Provision of an inter-connected park and open space system that is integrated into and accessible to the community. Preserve, protect, and enrich natural, cultural, and historic resources that serve as recreation facilities.	Consistent – As discussed in Section 5.14 (Public Services and Facilities), the proposed FPA includes an update to the Navajo Public Facilities Financing Plan (PFFP). The update will assure that public facilities ~~public facility demands~~ are adjusted to account for changes in future land use anticipated with project implementation. The PFFP update will include the mandatory payment of Development Impact Fees (DIFs), required as conditions of approval on a project-specific basis. Implementation of the proposed FPA would not impact the existing park, river conservancy areas, and open space system. No changes to any recreation facilities are proposed, and existing facilities would continue to be preserved.
Goal: An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities, and protection of the public health and safety.	Consistent – The proposed FPA involves no net loss of land designated as open space within the proposed FPA area, and provides for facilitation of the San Diego River Park Master Plan elements within the FPA area.
D. Conservation Element	
Climate Change and Sustainable Development	
Goal: Reduce the City's carbon footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management.	Consistent – As discussed in EIR Section 5.4 (Greenhouse Gas Emissions), any future development projects within the proposed FPA would be required to comply with all City and State GHG thresholds by reducing their potential construction-related and operational greenhouse gas emissions to below a level of significance. The Community Plan identifies specific submittal requirements for the proposed FPA area. See Grantville Section in the Navajo Community Plan.
Urban Runoff Management	
Goal: Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands.	Consistent – As discussed in EIR Section 5.8 (Water Quality), any future development projects within the proposed FPA would be required to comply with the Construction Permits (Chapter 12 Article 9 Division 1) and requirements of the 2013 Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego Regional Water Quality Control Board. ~~General Construction Permit, the Municipal Stormwater Permit and the City of San Diego Stormwater Standards Manual to reduce any potential impacts to water quality to below a level of significance.~~
Air Quality	
Goals: Regional air quality which meets state and federal standards. Reduction in greenhouse gas emissions effecting climate change.	Consistent – As discussed in EIR Sections 5.3 (Air Quality) and 5.4 (GHG), any future development projects within the proposed FPA would be required to comply with regional air quality standards and City greenhouse gas standards by reducing potential emissions to below a level of significance. The Community Plan identifies specific submittal requirements for the proposed FPA area. See Grantville Section in the Navajo Community Plan.
Biological Diversity	
Goal: Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.	Consistent – As discussed in EIR Section 5.6 (Biological Resources), any future development projects within the proposed FPA would be consistent with this goal by avoiding impacts to the extent practicable, minimizing unavoidable impacts, and mitigating any impacts that cannot be avoided or minimized. This is addressed per the City of San Diego's ESL requirements.

TABLE 5.1-1: (cont'd)General Plan Consistency Analysis

Wetlands	
Goal: Preservation of San Diego's rich biodiversity and heritage through the protection and restoration of wetland resources. Preservation of all existing wetland habitat in San Diego through a "no net loss" approach.	Consistent – As discussed in EIR Section 5.6 (Biological Resources), any future development projects within the proposed FPA would result in less than significant impacts to any existing wetland habitat with the implementation of Mitigation Measures BR-1 through BR-~~6~~ 5 and the associated mitigation elements identified in Section 5.6.9. In addition, future development projects within the proposed FPA would be required to provide an adequate buffer area between the development and wetlands associated with all wetlands/waters of the US located abutting the planning area such as the San Diego River and Alvarado Creek. This is addressed per the City of San Diego's ESL requirements.
E. Noise Element	
Goal: Minimal exposure of residential and other noise-sensitive land uses to excessive commercial, industrial, and mixed-use related noise.	**Not Consistent** – As discussed in EIR Section 5.5 (Noise), build-out under the proposed FPA could potentially result in the exposure of noise-sensitive land uses to predicted future noise levels that exceed those established in the General Plan or the SDMC. With implementation of Mitigation Measures N-1 through N-6, the significance of these impacts would be reduced; however, impacts would not be reduced to a level less than significant. Therefore, noise impacts to sensitive receptors would remain significant and unmitigable.
F. Historic Preservation Element	
Goals: Identification and preservation of the City's important historical resources. Integration of historic preservation planning in the larger planning process.	Consistent – As discussed in EIR Section 5.9 (Historical Resources), five buildings within the proposed FPA area have been identified as potentially eligible for designation as a historical resource. There is also potential for archaeological resources to exist within the FPA area. Therefore, future development projects implemented in accordance with the proposed FPA may result in potentially significant impacts to these resources. However, future development would be consistent with this goal by identifying existing and eligible historical resources, avoiding impacts to the extent practicable, minimizing unavoidable impacts, and mitigating any impacts that cannot be avoided or minimized through HR-1 and HR-2.
G. Urban Design Element	
Goal: A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects desirable community character and context.	Consistent – Implementation of the proposed FPA would introduce new mixed-use residential and commercial zones that would provide increased visual diversity, and new residential and commercial opportunities.
Goal: Vibrant, mixed-use main streets that serve as neighborhood destinations, community resources, and conduits to the regional transit system. Attractive and functional commercial corridors which link communities and provide goods and services.	Consistent – Implementation of the proposed FPA would encourage the transformation of Mission Gorge Road and Fairmount Avenue from low-density industrial areas to livelier, more appealing mixed-use areas.
H. Economic Prosperity Element	
Goal: Commercial development which uses land efficiently, offers flexibility to changing resident and business shopping needs, and improves environmental quality.	Consistent – Implementation of the proposed FPA would increase density within the proposed mixed-use commercial zones, which would encourage a greater volume of commercial activity and provide residents pedestrian-oriented opportunities for neighborhood shopping.
Goal: A city where new employment growth is encouraged in the existing regional center and subregional employment areas connected by transit to minimize the economic, social, and environmental costs of growth.	Consistent – The General Plan has identified Grantville as a subregional employment area. Most of the industrial uses have relocated to the northern part of the City because of their inability to compete effectively with commercial uses for land and buildings in these areas and the changing needs of modern industrial businesses for larger more efficient industrial buildings. Implementation of the proposed FPA would encourage a wider variety of commercial uses at a higher density, thereby promoting new employment growth within the project area.

H. Economic Prosperity Element Cont'd	
Goal: A city which redevelops and revitalizes areas which were blighted, to a condition of social, economic, and physical vitality consistent with community plans.	Consistent – Implementation of the proposed FPA would encourage future development in areas which are blighted consistent with community plans.
I. Housing Element	
Goal: Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next housing element cycle, 2013 - 2020, in a manner consistent with the development pattern of the Sustainable Communities Strategy, that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas.	Consistent – The proposed FPA increases the amount of housing allowed in Grantville from an existing 101 units to a total of 8,376 units. The proposed FPA will promote Transit Oriented Development within walking distance to the Grantville Trolley Station, with a mix of residential, commercial, and industrial uses that would be designed for the pedestrians without excluding automobiles and allow for the ability to reduce vehicle miles traveled and reduce associated air pollution and GHG emissions.
Goal: Streamline the entitlement and permitting process for new residential development by minimizing governmental constraints in the development, improvement, and maintenance of housing without compromising the quality of governmental review or the city's responsibility to ensure development takes place in a sustainable manner.	Consistent - The Community Plan Implementation Overlay Zone (CPIOZ) provides supplemental development regulations and guidelines that are tailored to specific sites within community plan areas of the City. The intent of these regulations is to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted. Future development on properties located within the CPIOZ that is consistent with the community plan, the base zone regulations, and these supplemental regulations will be processed ministerially, in accordance with the procedures of the CPIOZ.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

B. City of San Diego Land Development Code

Existing zoning for the CPIOZ area reflects the land use designations ~~of the CPIOZ~~ within the adopted Navajo Community Plan upon which it is based. The FPA would introduce higher density residential and commercial land use designations not currently reflected in the existing CPIOZ. As part of the FPA process, the City would ~~rescind~~ amend the existing CPIOZ that currently serves as the FPA area's zoning regulations ~~and replace it with a new CPIOZ that contains both new and existing zones that would~~ to allow for implementation of the new land use designations proposed by the FPA. The amended ~~new or modified zones that would be adopted within the~~ CPOIZ includes ~~rezoning~~ changing the existing Agricultural-Residential (AR-1-1), Commercial-Visitor (CV-1-1), Community-Commercial (CC-4-2), and Industrial-Light (IL-2-1, IL-3-1) to Community Commercial (CC-2-5, CC-3-6, CC-3-8, CC-3-9) and Residential-Multiple Unit (RM-3-7). A description of the proposed land uses and allowed densities are included in Table 3-2.

Rezoning would encourage ~~Application of existing, new, or modified zones would accommodate existing~~ development that conforms to the future vision for development within the FPA area, encourage new development projects that are consistent with community goals and character, and implement mixed-use development consistent with the General Plan goals and policies. In addition, the proposed zone changes to the Agricultural-Residential (AR-1-1) area will not convert any existing prime farmland to a more intensive use.

Two small areas that are currently zoned as Open Space-Floodplain (OF-1-1) will be rezoned to Community-Commercial (CC-2-5 and CC-3-6). These areas currently do not conform to the adopted zoning in the

~~current~~ CPIOZ and are currently used for commercial and industrial purposes. The rezoning ~~new designation~~ of these properties will encourage new development that meets the objectives of the Community Plan for the Grantville CPIOZ area. ~~through the updated CPIOZ will be consistent with the new zoning designation of the adjacent properties. In addition, the area where these properties are located is part of CPIOZ B, which requires any project to go through a discretionary process for development~~. CPIOZ B areas have not changed and these areas are subject to supplemental design regulation to implement needed setbacks and frontage requirements due to their adjacency to the San Diego River Park.

C. Navajo Community Plan

Table 5.1-2 provides an analysis of the proposed FPA's consistency with applicable objectives and development guidelines from the Navajo Community Plan.

TABLE 5.1-2:
Navajo Community Plan Consistency Analysis

A. Residential	
Objective: Promote a healthy environment by careful planning and sensitive development of well-defined, balanced and distinct communities which encompass a variety of residential density patterns and housing types.	Consistent – Implementation of the proposed FPA would allow for residential uses within the proposed Community Commercial zones CC-3-6, CC-3-8, and CC-3-9, and Multifamily Residential zone RM-3-7.
Objective: Prevent and/or limit development in proposed open space areas which serve to enhance community identity – steep slopes and canyons, floodplains, and areas with unique views and vistas.	Consistent – The proposed FPA involves no changes to any existing or planned open space land.
B. Commercial	
Objective: Restrict retail development to areas designed for commercial and mixed use; limit commercial office and service uses in the industrially designated areas to those that are accessory to industrial uses.	Consistent – Implementation of the proposed FPA would allow for commercial uses within the proposed Community Commercial zones CC-3-6, CC-3-8, and CC-3-9, and Multifamily Residential zone RM-3-7.
Proposal: Any rezones for new commercial center development and redevelopment should require processing in accordance with Planned Development Permit regulations to ensure comprehensive review of the center and its compatibility with adjacent development.	Consistent – Implementation of the proposed FPA would not directly result in any specific commercial center development. However, any commercial center development within the proposed FPA would be processed in accordance with Planned Development Permit regulations.
C. Industrial	
Objective: Ensure that the appearance and effects of industrial uses are compatible with the character of the surrounding residential and commercial areas and the sensitive resources of the San Diego River.	Consistent – Implementation of the proposed FPA would encourage industrial uses in the southwest corner of the proposed FPA area, west of Fairmount Avenue and south of San Diego Mission Road. This would reduce any potential incompatibility between adjacent industrial and residential or commercial uses that currently exist within and surrounding the proposed FPA area. In addition consolidating industrial uses and isolating them to a designated corner of the proposed FPA area would also help to reduce overall adjacency impacts with incompatible industrial uses.
D. Mixed-Use	
Objective: Promote walkability and a neighborhood environment by the integration of employment, residential, and regional and subregional commercial uses.	Consistent – Implementation of the proposed FPA would promote walkability and a neighborhood environment through the adoption of mixed-use Community Commercial and Multifamily Residential zones, which integrate employment, residential, and commercial uses.
Objective: Promote higher residential densities in the mixed-	Consistent – Implementation of the proposed FPA would

use areas.	increase the residential density ranges in mixed-use areas to between 30-43 dwelling units per acre (du/ac) for zones RM-3-7 and CC-3-6, between 44-73 du/ac for CC-3-8, and between 44-109 du/ac for CC-3-9.
E. San Diego River Park Subdistrict	
Objectives: Restore and maintain a healthy river system; unify fragmented lands and habitats; create a connected continuum; reveal the river valley history; reorient development toward the river to create value and opportunities for people to embrace the river.	Consistent – Implementation of the proposed FPA would not impact the existing park and open space system. No changes to any recreation facilities are proposed, and existing facilities would continue to be preserved. The proposed FPA involves no net loss of land currently used as open space.
Proposal: Coordinate with the redevelopment of Grantville to identify potential land for public parks and open space through land acquisition or open space easements.	Consistent – Implementation of the proposed FPA would not impact the existing park and open space system. No changes to any recreation facilities are proposed, and existing facilities would continue to be preserved. The proposed FPA involves no net loss of land currently used as open space.
F. Open Space Retention and Utilization	
Objectives: Preserve, improve and reconstruct the wetlands and riparian habitat areas in and along both sides of the San Diego River. Enhance and maintain the aesthetic and recreational qualities of the San Diego River corridor as part of the open space system.	Consistent – Implementation of the proposed FPA would not impact the existing park and open space system. The proposed FPA involves no net loss of land currently used as open space. In addition, implementation of the proposed FPA would be required to be consistent with the San Diego River Park Master Plan.
G. Parks and Recreation	
Objective: Develop sufficient and convenient parks and recreation facilities to serve the existing and future population of the community. Develop pedestrian and bikeway linkages between open space, neighborhood and community parks and other recreation and activity centers.	Consistent – Implementation of the proposed FPA would not impact any existing parks. No changes to any recreation facilities are proposed, and existing facilities would continue to be preserved. The proposed FPA involves no net loss of land currently used as open space. In addition, implementation of the proposed FPA would be required to be consistent with the San Diego River Park Master Plan.
H. Public Schools	
Objective: Assure that educational facilities are constructed and maintained to serve the population of the community and that they conform to the current board of education policies.	Consistent – As discussed in EIR Section 5.14 (Public Services and Facilities), implementation of the proposed FPA would require the eventual construction of new schools in order to accommodate the addition of up to 8,275 additional dwelling units in the proposed FPA area.
I. Other Community Facilities	
Objective: Assure that a high level of all public services is reached and maintained by adhering to standards set forth in the progress guide and general plan as a minimum.	Consistent – As discussed in EIR Section 5.14 (Public Services and Facilities), implementation of the proposed FPA would require that a high level of all public services is reached and maintained by adhering to standards set forth in the General Plan.
J. Circulation	
Objective: Encourage use of the integrated bus/Light Rail Transit system to maximize the benefits of the transportation system and its ability to efficiently move people and goods.	Consistent – The proposed FPA is designed to encourage use of public transit, including bus and light rail, by concentrating population nearer to the Grantville Transit Station. This would be achieved by allowing a greater residential density range and a wider variety of commercial uses for development around the station.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

D. City of San Diego Multiple Species Conservation Program Subarea Plan

In Section 1.4.3 of the MSCP Subarea Plan, the Land Use Adjacency Guidelines state that land uses adjacent to the MHPA will be managed to ensure minimal impacts to the MHPA. Table 5.1-3 lists the adjacency guidelines that the MSCP Subarea Plan states shall be addressed in order to minimize impacts and maintain the function of the MHPA.

E. San Diego River Park Master Plan

The San Diego River Park Master Plan contains policy recommendations that are categorized as either General (for the entire River Park Area) or Specific (for a particular reach such as the Confluence or Upper Valley).

Table 5.1-3:
City of San Diego MSCP Subarea Plan – Consistency Analysis

Recommendation	Project Consistency
Drainage – All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.	Consistent – Implementation of the proposed FPA would not directly result in any specific development activities that could impact drainage. However, any future development that occurs within the proposed FPA area would be subject to the MHPA land use adjacency guidelines.
Toxics - Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.	Consistent – Implementation of the proposed FPA would not directly result in any specific development activities with impacts related to toxics. However, any future development that occurs within the proposed FPA area would be subject to the MHPA land use adjacency guidelines.
Lighting - Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	Consistent – Implementation of the proposed FPA would not directly result in any specific development activities that could result in lighting impacts. However, any development that occurs within the proposed FPA area would be subject to the MHPA land use adjacency guidelines.
Noise - Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.	Consistent – Implementation of the proposed FPA would not directly result in any specific development activities that could result in noise impacts. However, any future development that occurs within the proposed FPA area would be subject to the MHPA land use adjacency guidelines.
Barriers - New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	Consistent – Implementation of the proposed FPA would not directly result in any specific development. However, any future development that occurs within the proposed FPA area would be subject to the MHPA land use adjacency guidelines.

Invasives - No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	Consistent – Implementation of the proposed FPA would not directly result in any specific development and would therefore not introduce any invasive species. However, any future development that occurs as within the proposed FPA area would be subject to the MHPA land use adjacency guidelines.
Brush Management - New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City's regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.	Consistent – Implementation of the proposed FPA would not directly result in any specific development. There are no slopes within the FPA area that are adjacent to the MHPA, or areas that are topographically above the MHPA. Notwithstanding, any future development that occurs within the proposed FPA area would be subject to the MHPA brush management guidelines as applicable.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

General Recommendations

The General Recommendations are divided into five objective categories: (1) Restore and maintain a healthy river system; (2) Unify fragmented lands and habitats; (3) Create a connected continuum, with a sequence of unique places and experiences; (4) Reveal the river valley history; and (5) Reorient development toward the river to create value and opportunities for people to embrace the river. An analysis of the proposed FPA's consistency with applicable General Recommendations is summarized in Table 5.1-4 below.

Table 5.1-4: San Diego River Park Master Plan General Recommendations – Consistency Analysis

Recommendation	Project Consistency
3.1.1 D. Encourage the growth of appropriate native riparian and upland vegetation.	Consistent – Implementation of the proposed FPA would not impact any existing vegetation within or adjacent to the San Diego River. The proposed FPA involves no net loss of land currently used as open space.
3.1.1 H. Future development projects should incorporate hydrology and water quality considerations in all planning and guidance documents and monitor water quality following implementation of the projects.	Consistent – No specific development is included as part of the proposed FPA. As discussed in EIR Sections 5.7 (Hydrology) and 5.8 (Water Quality), any future development projects within the proposed FPA area would be required to comply with the Construction Permits (Chapter 12 Article 9 Division 1) and requirements of the 2013 Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego Regional Water Quality Control Board ~~General Construction Permit, the Municipal Stormwater Permit and the City of San Diego Stormwater Standards Manual~~ to reduce any potential impacts to water quality, and reduce runoff rates and volumes to

Recommendation	Project Consistency
	below a level of significance.
3.1.2 A. Establish appropriate corridors for the river, wildlife and people.	Consistent – Implementation of the proposed FPA involves no net loss of land currently used as open space adjacent to the San Diego River. Additionally, the FPA proposes no development within the 35-foot wide River Corridor Area immediately south of the FEMA 100-year floodway boundary, as required for compliance with the City of San Diego Land Development Code.
3.1.5 B. Encourage development to provide active uses fronting the river.	Consistent – Future development projects within the proposed FPA would be encouraged to provide active uses fronting the river.
3.1.5 C. Encourage development to face the river.	Consistent – Future development projects within the proposed FPA would be encourage development to face the river.
3.1.5 D. Include access to the river through new development.	Consistent – Future development projects within the proposed FPA would be encouraged to include access to the river.
3.1.5 H. Enhance development edges facing the river with active uses.	Consistent – Future development projects within the proposed FPA would be encouraged to provide active uses fronting the river.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

Specific Recommendations

The specific recommendations for the Confluence and Upper Valley reach and the proposed FPA's consistency with these recommendations are summarized in Table 5.1-5 below.

Table 5.1-5: San Diego River Park Master Plan Specific Recommendations – Consistency Analysis

Recommendation	Project Consistency
A. Upper Valley Reach	
Create public parks along the San Diego River Pathway within the Grantville area and explore opportunities for water recreation.	Consistent – Future development projects within the proposed FPA area would be encouraged to coordinate with the San Diego River Park Foundation regarding the creation of public parks and opportunities for water recreation.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

F. Montgomery Field Airport Land Use Compatibility Plans (ALUCP)

As discussed above, the proposed FPA area is located 2.25 miles from Montgomery Field, and is located entirely within Review Area 2 of Montgomery Field's AIA. The proposed FPA area is located 5.5 miles from the SDIA, but is not located within its AIA. Although the proposed FPA area is within the Montgomery Field AIA, the project's proposed land uses are compatible with the Montgomery Field ALUCP, and the proposed FPA would not result in conflicts associated with its four compatibility concern areas.

G. SANDAG Regional Comprehensive Plan

Within the proposed FPA area, Grantville is designated as an existing/planned Urban Center. The desired building types within an Urban Center include mid- to high-rise residential and office/commercial, 40-75+ dwelling unit per acre residential within one-quarter mile of a transit station, and 25+ dwelling unit/acre for mixed-use sites within one-quarter mile of a transit station. Transportation system characteristics include

freeway connections with multiple access points, and a key transit center offering high-frequency regional public transit service. The proposed FPA would encourage residential and office/commercial uses at the desired density ranges, and feature a conveniently located freeway connection to I-8, and a key transit center with the Grantville trolley station. Thus, the proposed FPA is consistent with the planning efforts of the RCP.

H. Historical Resources Regulations

The Historical Resources Regulations (Section 143.0210 of the LDC) apply when historical resources are present. As defined by the HRR, historical resources include: historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. Based on results of several site-specific cultural resources surveys conducted for the proposed FPA, historical resources are known to occur within the FPA area. Section 5.9, Historical Resources, contains a discussion of proposed FPA impacts to historical resources. With implementation of the Mitigation Framework as detailed in Mitigation Measures HR-1 and HR-2, impacts would be less than significant.

5.1.3.2 Significance of Impact

Implementation of the proposed FPA would conflict the with one goal in the Noise Element of the General Plan. Otherwise, the proposed FPA does not conflict with the stated goals, objectives, and recommendations of the City of San Diego General Plan, City of San Diego Land Development Code, Navajo Community Plan, MSCP Subarea Plan, San Diego River Park Master Plan, Montgomery Field ALUCP, SANDAG RCP. However, because implementation of the ultimate buildout of the proposed FPA would result in a significant and unmitigable noise impact, which is not consistent with the Noise Element of the General Plan, a significant and unmitigable land use impact is identified.

5.1.3.3 Mitigation Framework

Implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 though N-6 would reduce development noise impacts related to the implementation of the proposed FPA to the extent feasible. However, noise impacts related to implementation of the FPA would not be reduced to below a level of significance, which would result in a conflict with the goal of the Noise Element of the General Plan. Therefore, no feasible mitigation is identified that would mitigate the conflict with this land impact and a significant and unmitigable land use impact is identified.

5.1.3.4 Significance After Mitigation(for Operational Noise)

No feasible mitigation is identified for noise impacts related to the development of the proposed FPA operational noise that would mitigate this land impact. ~~that would mitigate the conflict with this land impact and a~~A significant and unmitigable land use impact is identified.

5.1.4 Issue 2: Noise Compatibility

Issue 2: Would the proposed FPA result in the exposure of people to noise levels that exceed the City's noise ordinance or are incompatible with the Noise

Compatibility Guidelines in the Noise Element or Transportation Element of the General Plan?

5.1.4.1 Impact Analysis

The following information regarding noise impacts is summarized from Section 5.5 Noise in this EIR.

A. Temporary Construction Noise

Although implementation of the proposed FPA does not propose any specific development and would therefore not directly result in any noise impacts, temporary construction-related noise associated with the construction of over 8,000 new residential units would be likely to occur throughout the project area as future projects are developed within the proposed FPA area. There are currently few existing noise sensitive receptors within the proposed FPA area; however, future sensitive receptors would include both single and multifamily residences, and other sensitive uses may be developed. Adjacent construction activities could generate noise levels as high as 88 dBA; however, sustained noise levels would likely not be that high. Temporary construction noise could affect native species; however, as discussed in Sections 5.1.5 and 5.6 of this EIR, the MHPA Land Use Adjacency Guidelines would require specific noise reducing mitigation measures for certain MSCP-covered species during the breeding season.

B. Operational Noise

Although implementation of the proposed FPA does not propose any specific development and would therefore not directly result in any noise impacts, it is anticipated to indirectly result in an increase in traffic volumes and related noise levels throughout the study area by 2030, based on projected peak hour traffic volumes associated with the future development of individual projects within the proposed FPA area. The increase in future noise levels is expected to range from 0 to 3 dBA throughout the proposed FPA area, with the highest increase occurring along the Fairmount Avenue corridor, near its intersections with Vandever Avenue and Twain Avenue.

5.1.4.2 Significance of Impact

A. Temporary Construction Noise

The San Diego Municipal Code (Section 59.5.0404) allows a maximum exterior noise limit of 75 dB Leq between the hours of 7:00 am to 7:00 pm. This threshold was used to determine whether construction noise could result in a significant impact on nearby sensitive receptors. Because construction activities could generate noise levels as high as 88 dBA, construction noise could cause a significant temporary increase in noise levels as defined under Appendix G, Section XII, Noise (d) of the CEQA Guidelines.

B. Operational Noise

The City of San Diego requires new projects to meet exterior noise level standards as established in the Noise Element of the General Plan. Traffic-related noise impacts are considered significant if project-generated traffic would result in exterior noise levels exceeding 65 dBA or interior levels exceeding 45 dBA for single and multi-family residences. If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is

not considered significant. Because noise levels within the proposed FPA area currently exceed the 65 dBA exterior criteria for residential uses, and the increase in future exterior noise levels is expected to be as high as 3 dBA, the increase in noise levels is considered a substantial permanent increase and a significant impact.

5.1.4.3 Mitigation Framework

Implementation of the proposed FPA may indirectly result in potentially significant temporary construction noise impacts and operational noise impacts associated with the development of future individual projects. Implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 through N-6 would avoid, reduce, or minimize these impacts to the extent feasible.

5.1.4.4 Significance After Mitigation

With implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 through N-6, the potential significant noise impacts associated with to temporary construction noise and/or operational noise associated with future development projects within the proposed FPA would be reduced, however, not to below a level of significance. Therefore, noise impacts to sensitive receptors would remain significant and unmitigable.

5.1.5 Issue 3: MHPA Edge Effects

Issue 3: Would the proposed FPA result in adverse edge effects to the MHPA?

5.1.5.1 Impact Analysis

Edge effects are defined as the impact to biological resources caused by their proximity to developed areas located adjacent to the MHPA. Edge effects may include, but are not limited to, trampling, dumping, vehicular traffic, competition with invasive species, parasitism, predation by domestic animals, noise, collecting, recreational activities, and other human intrusion (City of San Diego, 1997). Implementation of the proposed FPA would not directly result in any specific development activities that could result in adverse edge effects to the MHPA. However, any future development that occurs within the proposed FPA area adjacent to the MHPA may potentially result in adverse edge effects to the MHPA.

Indirect impacts are defined in the CEQA Guidelines as "effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable." Indirect impacts can result in a temporary or permanent impact that causes a biologically significant change in the environment (California Resources Agency 2001: §15358). Indirect impacts may potentially include:

- Noise, dust and associated construction activity could affect animals during construction
- The introduction of invasive exotic plant species into native habitats from disturbance or removal of native vegetation communities
- Excessive irrigation of landscaping adjacent to native vegetation communities could alter the localized natural moisture regime and increase weediness and susceptibility of plants to disease, pests, and fungus.

- Increased urban runoff and pollution into native vegetation communities through use of herbicides, pesticides, and fertilizers.
- Increase of human disturbance of native vegetation through trampling and introduction of non-native, weedy species.

5.1.5.2 Significance of Impact

Future development activities that would be allowed with the implementation of the proposed FPA have the potential to result in direct and indirect impacts to biological resources. However, compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations, and the implementation of Mitigation Measure LU-1 ~~through LU-3~~ would ensure that potentially significant indirect impacts with regard to adverse edge effects to the MHPA would be reduced to a level below significance.

5.1.5.3 Mitigation Framework

Compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations, and the implementation of the Mitigation Framework as detailed in Mitigation Measure LU-1 ~~through LU-3~~ would reduce potential impacts below a level of significance.

5.1.5.4 Significance After Mitigation

With implementation of the proposed mitigation measures, any potentially significant indirect impacts with regard to adverse edge effects to the MHPA would be reduced to a level below significance.

5.1.6 Issue 4: Conflict with Plans for Biological Resources

Issue 4: Would the project conflict with any local policies or ordinances protecting biological resources?

5.1.6.1 Impact Analysis

Local policies and ordinances protecting biological resources include the City of San Diego MSCP Subarea Plan, and the Biology Guidelines/Environmentally Sensitive Lands (ESL) regulations within the City of San Diego Land Development Code. The MSCP Subarea Plan identifies land uses as considered conditionally compatible with the biological objectives of the MSCP (i.e. passive recreation, utility lines and roads in compliance with the MSCP, limited water facilities and other essential public facilities, limited low-density residential uses, Brush Management Zone 2, and limited agriculture). However, the proposed FPA does not propose any change in land use for MHPA land within the project area.

In several peripheral areas in the Program Area, particularly at its western boundary, the proposed FPA contains and is adjacent to MHPA land, although no developed land is included or proposed to be included in the MHPA. This urban habitat area contributes to the MSCP by providing habitat for native species, shelter and forage for migrating species, and linkages between biological core areas capable of supporting a diverse range of native species. As such, there is the potential that future development projects in the proposed FPA area would result in direct and indirect impacts to MSCP covered plant and wildlife species and may result in conflict with the MSCP Subarea Plan. The following provides an analysis of

the potential direct and indirect impacts associated with potential future development projects within the proposed FPA area.

A. Direct Impacts

Implementation of any future development projects within the proposed FPA area would need to be in conformance with all applicable City regulations, including the MSCP Subarea Plan, Environmentally Sensitive Land Regulations, and Biology Guidelines, and would also need to conform to state and federal regulations if wetlands impacts or impacts on non-MSCP covered species would result. For projects that would not impact Tier I-III habitats or wetlands (including wetland buffers), biological resource impacts would not generally be anticipated. However, some exceptions may occur such as the use of an area for wildlife movement, raptors nests in ornamental trees, etc. For areas that do have such resources, a site-specific analysis of biological resources would be conducted using the data included herein as a basis.

Development Outside the MHPA

For parcels located outside of the MHPA, there is no limit on encroachment into sensitive biological resources, with the exception of wetlands, narrow endemics, and federally or state listed species that are not covered by the MSCP. However, impacts to sensitive biological resources must be assessed, and mitigation, where necessary, must be provided as described in ~~Table 5.1-6~~Section 5.6, Biological Resources. Impacts to Tier II or III communities may be achieved through preservation within the tier or higher. Land with the appropriate habitat may be preserved in perpetuity, or payment into the City's habitat acquisition fund may be made to satisfy the mitigation requirements.

Impacts to wetlands must be avoided to the maximum extent practicable both within and outside of the MHPA. See the Regulatory Setting for a full discussion of wetland regulatory constraints. Impacts on Narrow Endemic species must be avoided to the maximum extent practicable. If impacts cannot be avoided, then management, enhancement, or transplantation would be required.

Development Inside or Adjacent to the MHPA

For parcels located within or partially within the MHPA, limits on encroachments into MHPA lands are set forth in the City's Environmentally Sensitive Lands Regulations and Biology Guidelines. For parcels located entirely within the MHPA, up to 25% of the parcel may be developed and development must be sited within the least biologically sensitive portions of the parcel.

For parcels located partially within the MHPA, the portion of the site outside of the MHPA may be developed, subject to applicable land use and development regulations, and encroachment into the MHPA is allowed if necessary in order to achieve a 25% development area on the entire parcel. For projects developed in conformance with the MSCP, impacts on biological resources on properties entirely constrained by the MHPA is achieved through preservation of the undeveloped portion of the parcel through: 1) Granting the land to the City; 2) A conservation easement; or 3) A covenant of easement.

In addition, any projects located adjacent the MHPA must conform to the MHPA Land Use Adjacency Guidelines as described in the Regulatory Setting.

TABLE 5.1-6
City of San Diego Mitigation Requirements for Habitat Impacts Outside and Inside of the MHPA

TIER	HABITAT TYPE	REQUIRED MITIGATION RATIOS
TIER 1: (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	**Impact Outside of MHPA** Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 2:1 **Impact Inside of MHPA** Preservation Inside MHPA: 2:1 Preservation Outside MHPA: 3:1
TIER II: (uncommon uplands)	Coastal Sage Scrub (CSS) CSS/Chaparral	**Impact Outside of MHPA** Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 1.5:1 **Impact Inside of MHPA** Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 2:1
TIER III A: (common uplands)	Mixed Chaparral Chamise Chaparral	**Impact Outside of MHPA** Preservation Inside MHPA: 0.5:1 Preservation Outside MHPA: 1:1 **Impact Inside of MHPA** Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 1.5:1
TIER III B: (common uplands)	Non-native Grasslands	**Impact Outside of MHPA** Preservation Inside MHPA: 0.5:1 Preservation Outside MHPA: 1:1 **Impact Inside of MHPA** Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 1.5:1
TIER IV: (other uplands)	Disturbed Land Agriculture Eucalyptus Woodland Ornamental Plantings	Impacts to these areas are less than significant; no mitigation required.

Source: Rocks Biological Consulting, 2014.

B. Indirect Impacts

Future development actions that are consistent with the City's MSCP Subarea Plan would provide for the long-term viability of wildlife and sensitive habitats. Portions of the proposed FPA area lie within or adjacent to the MHPA and these areas could incur indirect impacts from future development activities. These indirect impacts include allowable compatible uses within the MHPA, such as passive recreation, utility line

and road maintenance, and essential public facility improvement. Since specific future development activities are not presently defined, it is not possible to address required compliance with detailed MSCP planning. Implementation of Mitigation Measure LU-1 ~~through LU-3~~ would reduce the potential impact to less than significant.

5.1.6.2 Significance of Impact

Future development projects that would result from the proposed land use amendments would potentially have direct and indirect impacts to City MHPA lands. As such, these potential impacts would be considered significant. For parcels located outside of the MHPA, there is no limit on encroachment into sensitive biological resources, with the exception of wetlands, narrow endemics, and federally or state listed species that are not covered by the MSCP. For parcels located within or partially within the MHPA, limits on encroachments to MHPA lands are set forth in the City's Environmentally Sensitive Lands Regulations and Biology Guidelines. All future developments in the proposed FPA area located within or adjacent to MHPA lands would be required to comply with the applicable provisions of the City's MSCP Subarea Plan. In addition, implementation of the Mitigation Framework as detailed in Mitigation Measure LU-1 ~~through LU-3~~ would ensure that any potential impacts to the City's MSCP plan area that may result from future development projects would be reduced to a less than significant level.

5.1.6.3 Mitigation Framework

All future developments in the proposed FPA area located within or adjacent to MHPA lands would be required to comply with the applicable provisions of the City's MSCP Subarea Plan. For parcels partially constrained by the MHPA, biological impacts would require mitigation at the ratios set forth in Table 5.1-7 below. Note that undeveloped portions of the site may be used toward any required mitigation. In addition, implementation of the Mitigation Framework as detailed in Mitigation Measure LU-1 ~~through LU-3~~ would ensure that any potential impacts to the City's MSCP plan area that may result from future development projects would be reduced to a less than significant level.

5.1.6.4 Significance After Mitigation

With implementation of Mitigation Measure LU-1 through LU-3, potential direct and indirect impacts to the City's MSCP plan area associated with future development projects would remain less than significant.

5.1.7 Mitigation Framework

The following measures would provide mitigation for impacts associated with conflicts with applicable land use plans; specifically, the MSCP. All future development activities will be required to be in compliance with City of San Diego MSCP Subarea Plan and its implementing regulations.

Future development project types that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulation for CPIOZ Type A and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework LU-1 through LU-3.

~~**LU-1** Future development project policies shall include a requirement to make use of project designs, engineering, and construction practices that avoid and minimize impacts to sensitive habitats and wildlife corridor/MHPA preserve areas.~~

~~**LU-2** Further environmental review shall be conducted in compliance with the most recent versions of all applicable local, state, and federal regulations where specific actions would result in impacts to sensitive habitats and/or wildlife corridor/MHPA preserve areas. These reviews shall be conducted at the earliest possible period of tiered project review to ensure the most flexibility in planning and project design, and resolve conflicts with significant biological resources.~~

LU-1~~3~~ All future specific actions undertaken at or near the San Diego River or adjacent to the MHPA shall be reviewed for consistency with the MSCP preserve and development requirements, as well as the MHPA Land Use Adjacency Guidelines.

5.1.8 Conclusion

With the exception of the Noise Element of the General Plan, the proposed FPA is consistent with all land use plans, policies, and ordinances.

Implementation of the proposed FPA would result in a significant and unmitigable noise impact, which conflicts with the goals of the Noise Element of the General Plan. Therefore, a significant and unmitigable land use impact is identified related to the Noise Element of the General Plan.

Future development activities that would be allowed with the implementation of the proposed FPA have the potential to result in conflicts with the MSCP; however, compliance with the City of San Diego MSCP Subarea Plan, its implementing regulations, and the implementation of Mitigation Framework as detailed in Mitigation Measure LU-1 ~~through LU-3~~ would reduce potential impacts to a level less than significant.

5.2 Transportation/Circulation

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with traffic and circulation. Information contained in this section is summarized from the *Traffic Impact Analysis* prepared by Linscott Law and Greenspan, Engineers (LLG) dated July 18, 2014 (Appendix B of this PEIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix B, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix B, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, rezone, CPIOZ, and PFFP) have not changed.

5.2.1 Existing Conditions

5.2.1.1 Existing Street Network

Figure 5.2-1A & B depicts the study area established for the proposed FPA in the traffic impact analysis. The proposed FPA is an approximately 280-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue. The principle roadways in the study area are identified below:

Study Area Streets

- Friars Road
- Mission Gorge Road
- Fairmount Avenue
- Vandever Avenue
- Twain Avenue
- San Diego Mission Road
- Waring Road
- Zion Avenue
- Princess View Drive
- Camino Del Rio North

5.2.1.2 Existing Public Transportation Network

According to the San Diego Metropolitan Transit System, the Grantville Trolley Station is in the south central portion of the site, which services the Green Line, and there are currently three bus routes that operate in the FPA area—Routes 13, 14, and 18. The Green Line runs from Santee, west of the City, to the 12th and Imperial Station, in the southern part of Downtown San Diego. Bus Route 13 provides cross-town service on Zion Avenue, Mission Gorge Road, and Fairmont Avenue. It connects Kaiser Permanante Foundation Hospital to the 24th Street Trolley Station in National City, and has stops at the Grantville Trolley Station and the Euclid Trolley Station. Bus Route 14 connects the Grantville Trolley station with Lake Murray Boulevard, and includes a loop around San Diego State University. Bus Route 18 starts and ends at the Grantville Trolley Station and traverses Camino del Rio South and Camino del Rio North. Qualcomm Way is the westernmost point of Bus Route 18.

5.2.1.3 Existing Traffic Conditions

A. Existing Traffic Volumes

Peak hour traffic volumes and average daily traffic (ADT) volume counts for City streets were conducted by LLG at the study area in October 2013. Table 5.2-1 illustrates the existing ADT volumes. The existing ADT volumes are depicted in Figure 5.2-2A & B.

B. Existing Intersection Operations

All of the intersections within the study area were evaluated. Figure 5.2-2A & B provides the Existing Average Daily Traffic Volumes in the study area. As shown in the Table 5.2-2, all intersections operate at an acceptable level of service (LOS) (i.e. LOS D or better) during both the AM and PM peak hours, except for the following intersections:

- Friars Road/I-15 SB Ramps (LOS E during the AM peak hours and LOS F during the PM peak hours);
- Friars Road/Riverside Street (LOS E during the PM peak hour);
- Mission Gorge Road/Zion Avenue (LOS F during the AM peak hour); and,
- Fairmount Avenue/Alvarado Road/Camino Del Rio N. (LOS E during the AM and LOS F during the PM peak hours).

C. Existing Street Segment Operations

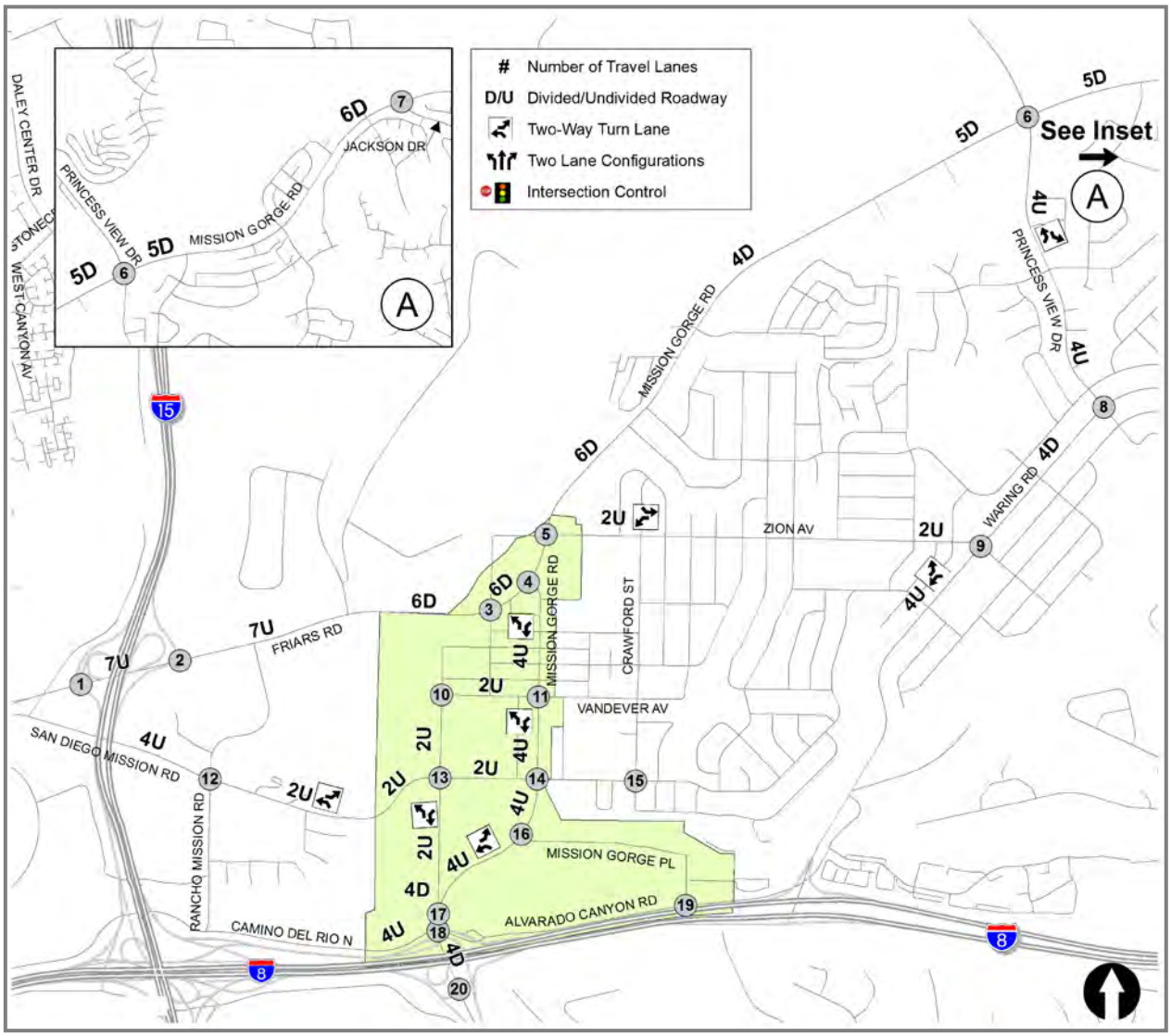
Based on average daily traffic volumes, street widths and functional classification and city street standards, existing street segment LOS were determined. Table 5.2-3 summarizes the result of this analysis. All streets in the study area, except for the following segments, presently operate at an LOS D or better:

- Mission Gorge Road: Vandever Avenue to Twain Avenue (LOS F);
- Mission Gorge Road: Mission Gorge Place to Fairmount Avenue (LOS E): and,
- Fairmont Avenue: Alvarado Canyon Road to I-8 WB Ramps (LOS F).

D. Existing Freeway Segment Operations

Freeway segments were also analyzed under the existing conditions. All freeway segments, except for the following segments, presently operate at an acceptable LOS, as shown in Table 5.2-4 below:

- I-15 NB: Aero Drive to Friars Road (LOS F (0) during the AM peak hours);
- I-15 NB: Friars Road to I-8 (LOS E during the AM peak hour);
- I-8 EB: I-15 to Fairmount Avenue (LOS F (0) during the PM peak hour); and,
- I-8 WB: Fairmount Avenue to Waring Road (LOS E during the AM peak hour).



SOURCE: 2014, SanGIS. 2014: City of San Diego.2014

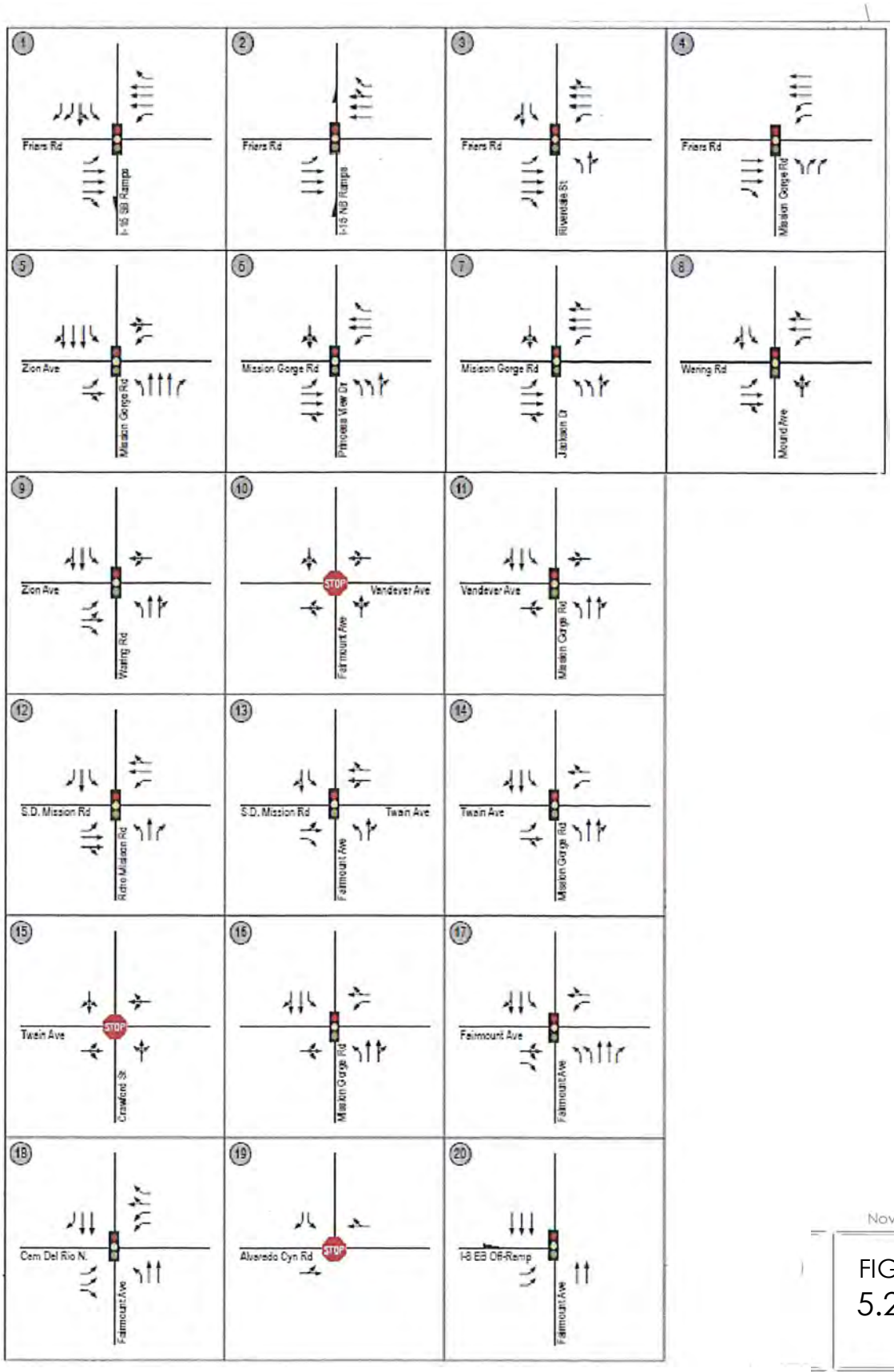
November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

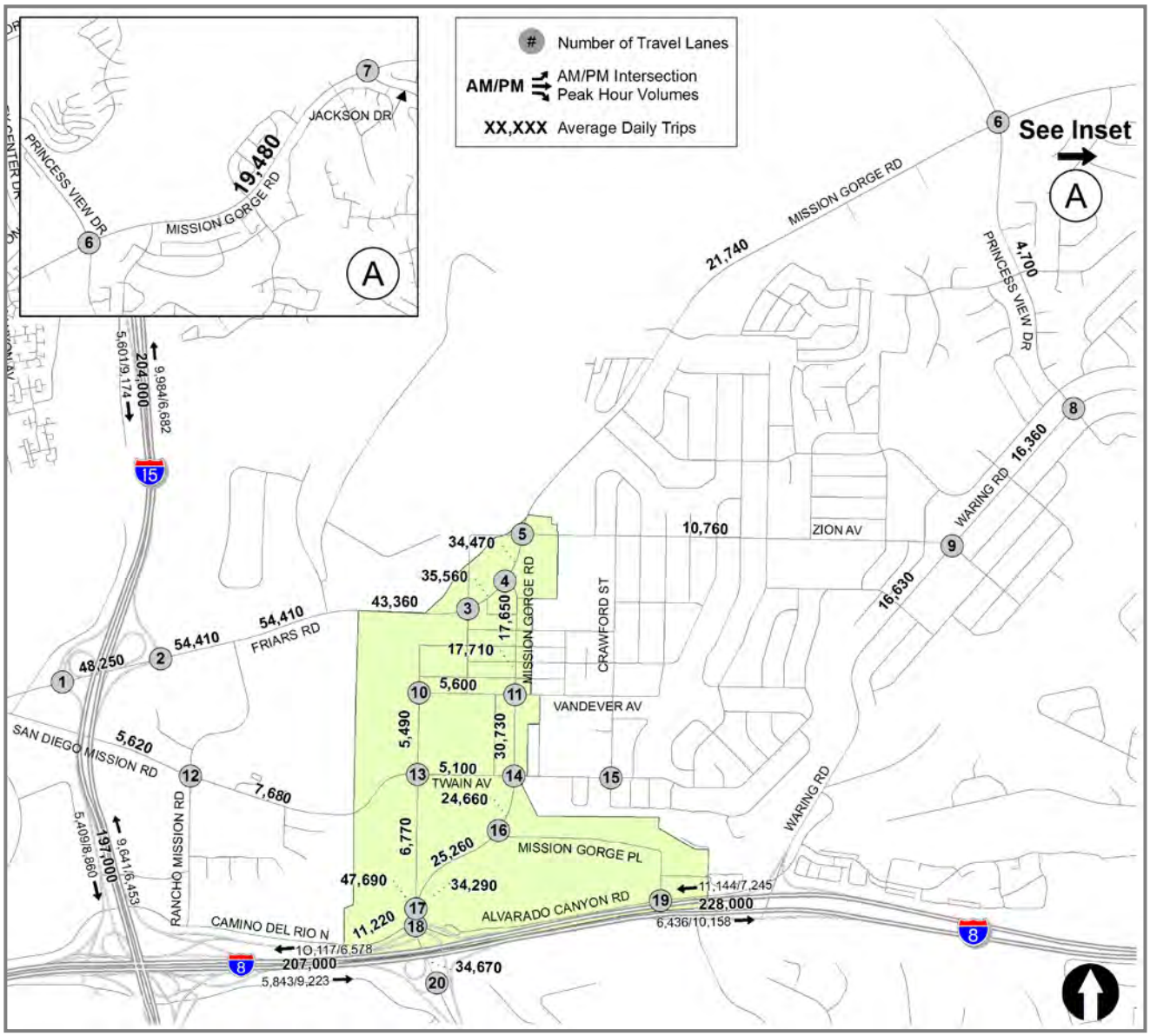
Existing Conditions

FIGURE 5.2-1A



November 2014

FIGURE
5.2-1B



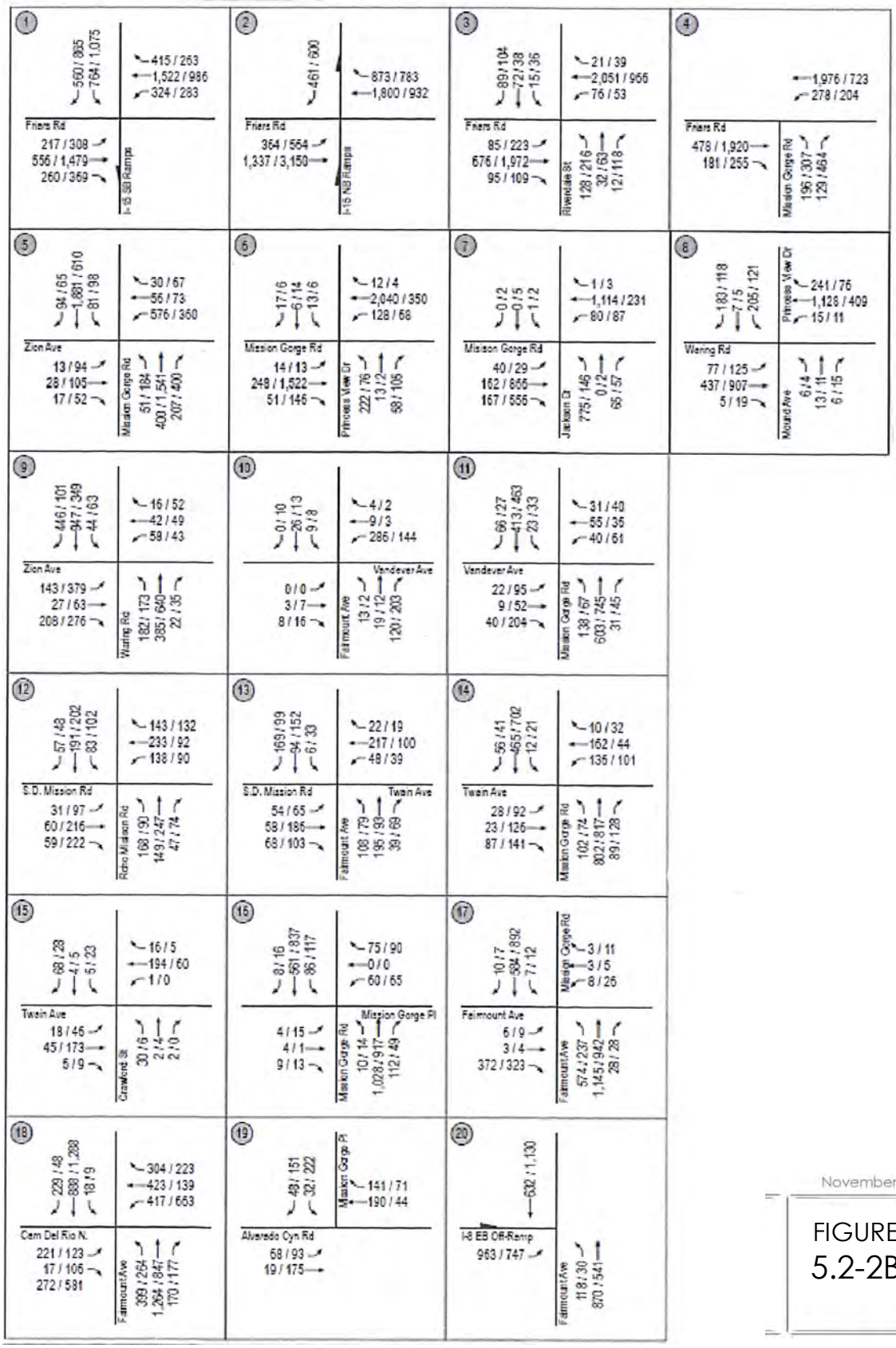
SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Existing Traffic Volumes

FIGURE 5.2-2A



November 2014

FIGURE
5.2-2B

Table 5.2-1
Existing Average Daily Traffic (ADT) Volumes

Street Segment	Classification	Capacity (LOS E) [a]	ADT [b]
Friars Road			
I-15 SB Ramps to I-15 NB Ramps	6-Lane Primary Arterial	60,000	48,250
I-15 NB Ramps to Rancho Mission Rd	7-Lane Primary Arterial	65,000	54,410
Rancho Mission Rd to Santo Rd	7-Lane Primary Arterial	65,000	54,410
Santo Rd to Riverdale Rd	6-Lane Primary Arterial	60,000	43,360
Riverdale Rd to Mission Gorge Rd	6-Lane Primary Arterial	60,000	35,560
Mission Gorge Road			
Jackson Dr to Princess View Dr	6-Lane Major Street	50,000	19,480
Princess View Dr to Zion Ave	6-Lane Primary Arterial	60,000	21,740
Zion Ave to Friars Rd	6-Lane Primary Arterial	60,000	37,470
Friars Rd to Rainier Ave	4-Lane Collector Street	30,000	17,650
Rainier Ave to Vandever Ave	4-Lane Collector Street	30,000	17,710
Vandever Ave to Twain Ave	4-Lane Collector Street	30,000	30,730
Twain Ave to Mission Gorge Pl	4-Lane Collector Street	30,000	24,660
Mission Gorge Pl to Fairmount Ave	4-Lane Collector Street	30,000	25,260
Fairmount Avenue			
Vandever Ave to Twain Ave	2-Lane Local Collector Street	8,000	5,490
Twain Ave to Mission Gorge Rd	2-Lane Local Collector with TWLTL[e]	15,000	6,770
Mission Gorge Rd to Alvarado Canyon Rd	4-Lane Major Street	40,000	34,290
Alvarado Canyon Rd to I-8 WB Ramps	4-Lane Major Street	40,000	47,690
I-8 WB Ramps to I-8 EB Ramps	4-Lane Major Street	40,000	34,670
Vandever Avenue			
Riverdale St to Mission Gorge Rd	2-Lane Local Collector Street	8,000	5,600
Twain Avenue			
Fairmount Ave to Mission Gorge Rd	2-Lane Local Collector Street	8,000	5,100
San Diego Mission Road			
West of Rancho Mission Rd	4-Lane Major Street	40,000	5,620
Rancho Mission Rd to Fairmount Ave	2-Lane Local Collector Street	15,000	7,680
Waring Road			
Princess View Dr to Zion Ave	4-Lane Major Street	40,000	16,360
Zion Ave to Orcutt Ave	4-Lane Major Street	40,000	16,630
Zion Avenue			
Mission Gorge Rd to Waring Rd	2-Lane Local Collector with TWLTL	15,000	10,760
Princess View Drive			
Mission Gorge Rd to Waring Rd	4-Lane Major Street	40,000	4,740
Camino Del Rio North			
Fairmount Ave to Ward Rd	4-Lane Collector Street	30,000	11,220

Footnotes:

a. Capacities based on City of San Diego Roadway Classification Table

b. Average Daily Traffic Volumes

Table 5.2-2
Existing Intersection Operations

Intersection	Control Type	Peak Hour	Existing	
			Delay[a]	LOS[b]
1. Friars Road / I-15 SB Ramps	Signal	AM	**76.8**	**E**
		PM	**90.8**	**F**
2. Friars Road / I-15 NB Ramps	Signal	AM	24.0	C
		PM	22.0	C
3. Friars Road / Riverdale Street	Signal	AM	33.1	C
		PM	**57.8**	**E**
4. Friars Road / Mission Gorge Road	Signal	AM	18.5	B
		PM	29.0	C
5. Mission Gorge Road / Zion Avenue	Signal	AM	**>100**	**F**
		PM	52.1	D
6. Mission Gorge Road / Princess View Drive	Signal	AM	51.0	D
		PM	20.5	C
7. Mission Gorge Road / Jackson Drive	Signal	AM	32.9	C
		PM	21.0	C
8. Waring Road / Princess View Drive	Signal	AM	24.2	C
		PM	11.9	B
9. Waring Road / Zion Avenue	Signal	AM	41.9	D
		PM	47.5	D
10. Fairmount Avenue / Vandever Avenue	AWSC[c]	AM	12.7	B
		PM	9.0	A
11. Mission Gorge Road / Vandever Avenue	Signal	AM	18.1	B
		PM	32.1	C
12. San Diego Mission Road / Rancho Mission Road	Signal	AM	24.4	C
		PM	21.9	C
13. Fairmount Avenue / Twain Avenue	Signal	AM	20.8	C
		PM	20.6	C
14. Mission Gorge Road / Twain Avenue	Signal	AM	25.8	C
		PM	28.8	C
15. Twain Avenue / Crawford Street	AWSC[c]	AM	9.2	A
		PM	8.9	A
16. Mission Gorge Road / Mission Gorge Place	Signal	AM	12.6	B
		PM	14.1	B
17. Fairmount Avenue / Mission Gorge Place	Signal	AM	31.8	C
		PM	31.8	C
18. Fairmount Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio N.	Signal	AM	**72.8**	**E**
		PM	**>100**	**F**
19. Alvarado Canyon Road / Mission Gorge Place	AWSC[c]	AM	10.3	B
		PM	12.8	B
20. Fairmount Avenue / I-8 EB Off-Ramp	Signal	AM	25.4	C
		PM	14.9	B

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. AWSC – All-Way Stop Controlled intersection. Minor street left turn delay is reported.

General Notes:
Bold typeface indicates intersections operating at LOS E or F
Source: LLG, 2014.

Table 5.2-3
Existing Street Segment Operations

Street Segment	Classification	Capacity (LOS E) [a]	ADT [b]	LOS [c]	V/C [d]
Friars Road					
I-15 SB Ramps to I-15 NB Ramps	6-Lane Primary Arterial	60,000	48,250	C	0.804
I-15 NB Ramps to Rancho Mission Rd	7-Lane Primary Arterial	65,000	54,410	D	0.837
Rancho Mission Rd to Santo Rd	7-Lane Primary Arterial	65,000	54,410	D	0.837
Santo Rd to Riverdale Rd	6-Lane Primary Arterial	60,000	43,360	C	0.723
Riverdale Rd to Mission Gorge Rd	6-Lane Primary Arterial	60,000	35,560	C	0.593
Mission Gorge Road					
Jackson Dr to Princess View Dr	6-Lane Major Street	50,000	19,480	A	0.390
Princess View Dr to Zion Ave	6-Lane Primary Arterial	60,000	21,740	A	0.362
Zion Ave to Friars Rd	6-Lane Primary Arterial	60,000	37,470	C	0.625
Friars Rd to Rainier Ave	4-Lane Collector Street	30,000	17,650	C	0.588
Rainier Ave to Vandever Ave	4-Lane Collector Street	30,000	17,710	C	0.590
Vandever Ave to Twain Ave	4-Lane Collector Street	30,000	30,730	**F**	**1.024**
Twain Ave to Mission Gorge Pl	4-Lane Collector Street	30,000	24,660	D	0.822
Mission Gorge Pl to Fairmount Ave	4-Lane Collector Street	30,000	25,260	**E**	**0.842**
Fairmount Avenue					
Vandever Ave to Twain Ave	2-Lane Local Collector Street	8,000	5,490	D	0.686
Twain Ave to Mission Gorge Rd	2-Lane Local Collector with TWLTL[e]	15,000	6,770	B	0.451
Mission Gorge Rd to Alvarado Canyon Rd	4-Lane Major Street	40,000	34,290	D	0.857
Alvarado Canyon Rd to I-8 WB Ramps	4-Lane Major Street	40,000	47,690	**F**	**1.192**
I-8 WB Ramps to I-8 EB Ramps	4-Lane Major Street	40,000	34,670	D	0.867
Vandever Avenue					
Riverdale St to Mission Gorge Rd	2-Lane Local Collector Street	8,000	5,600	D	0.700
Twain Avenue					
Fairmount Ave to Mission Gorge Rd	2-Lane Local Collector Street	8,000	5,100	D	0.638
San Diego Mission Road					
West of Rancho Mission Rd	4-Lane Major Street	40,000	5,620	A	0.141
Rancho Mission Rd to Fairmount Ave	2-Lane Local Collector Street	15,000	7,680	C	0.512
Waring Road					
Princess View Dr to Zion Ave	4-Lane Major Street	40,000	16,360	B	0.409
Zion Ave to Orcutt Ave	4-Lane Major Street	40,000	16,630	B	0.416
Zion Avenue					
Mission Gorge Rd to Waring Rd	2-Lane Local Collector with TWLTL	15,000	10,760	D	0.717
Princess View Drive					
Mission Gorge Rd to Waring Rd	4-Lane Major Street	40,000	4,740	A	0.119
Camino Del Rio North					
Fairmount Ave to Ward Rd	4-Lane Collector Street	30,000	11,220	B	0.374

Footnotes:

a. Capacities based on City of San Diego Roadway Classification Table.
b. Average Daily Traffic Volumes.
c. Level of Service.
d. Volume to Capacity.
e. Two-way left-turn lane

General Notes:

Bold typeface indicates intersections operating at LOS E or F Source: LLG, 2014.

Table 5.2-4
Existing Freeway Segment Operations

Freeway and Segment	Dir.	Number of Lanes[a]	Hourly Capacity	ADT[b]	AM			PM		
					Peak Hour Volume	V/C	LOS	Peak Hour Volume	V/C	LOS
Interstate 15										
Aero Drive to Friars Road	NB	4M+ 1A	9,200	204,000	**9,984**	**1.085**	**F(0)**	6,682	0.726	C
	SB	4M+ 2A	10,400		5,601	0.539	B	9,174	0.882	D
Friars Road to I-8	NB	4M+ 2A	10,400	197,000	**9,641**	**0.927**	**E**	6,453	0.620	C
	SB	4M+2CD+1A	13,200		5,409	0.410	B	8,860	0.671	C
Interstate 8										
Interstate 15 to Fairmount Avenue	EB	4M	8,000	207,000	5,843	0.730	C	**9,223**	**1.153**	**F(0)**
	WB	4M+2CD	12,000		10,117	0.843	D	6,578	0.548	B
Fairmount Avenue to Waring Road	EB	4M+1CD+1A	11,200	228,000	6,436	0.575	B	10,158	0.907	D
	WB	5M+ 1A	11,200		**11,144**	**0.995**	**E**	7,245	0.647	C

Footnotes:

a. Capacity calculated at 2000 ADT per lane and 1200 ADT per aux lane (M: Mainline, CD: Collector Distributor, A: Auxiliary Lane, HOV: High Occupancy Vehicle Lane).
Example: 4M+2A=4 Mainlines + 2 Auxiliary Lanes)-

b. Existing ADT Volumes from CALTRANS online Traffic Data Branch, 2013.

General Notes:

See Table 5.2-6 for definitions for LOS (Level of Service)

Bold typeface indicates intersections operating at LOS E or F

Source: LLG, 2014.

E. Ramp Meter Operations

Ramp meter operations were also analyzed under the existing conditions. All ramp meters, except for the following presently operate at an acceptable LOS, as shown in Table 5.2-5 below:

- Friars Road to Northbound I-15 (PM peak hour).

Table 5.2-5
Existing Ramp Meter Operations

Location/Condition	Min/ Max Rate	Peak Hour Demand	Peak Hour Demand/Lane	Meter Flow Rate (Veh/hr/lane)	Excess Demand (Veh/hr/lane)	Delay (min)	Queue (ft)
I-15 / Friars Road Interchange							
Northbound Ramp (AM Peak Hour)							
Existing	Min	1237	578	516	62	7	145
	Max	1237	578	600	0	0	0
I-15/I-8 Southbound Ramp (AM Peak Hour)							
Existing	Min	632	632	660	0	0	0
	Max	632	632	996	0	0	0
I-15 Southbound Ramp (AM Peak Hour)							
Existing	Min	260	260	660	0	0	0
	Max	260	260	996	0	0	0
Northbound Ramp (PM Peak Hour)							
Existing	Min	1347	630	386	244	**38**	758
	Max	1347	630	672	0	0	0
I-15/I-8 Southbound Ramp (PM Peak Hour)							
Existing	Min	571	571	660	0	0	0
	Max	571	571	996	0	0	0
I-15 Southbound Ramp (AM Peak Hour)							
Existing	Min	369	369	660	0	0	0
	Max	369	369	996	0	0	0
I-8 / Fairmount Avenue Interchange							
Eastbound Ramp (AM Peak Hour) - Fairmount Avenue SB							
Existing	Min	232	232	516	0	0	0
	Max	232	232	600	0	0	0
Eastbound Ramp (PM Peak Hour) - Fairmount Avenue SB							
Existing	Min	510	510	660	0	0	0
	Max	510	510	996	0	0	0

Footnotes:
a. Meter Rates obtained from CALTRANS.
b. Delay expressed in minutes.
c. Queue
Source: LLG, 2014

5.2.1.4 Navajo Community Plan Circulation Element

The *Navajo Community Plan Circulation Element* emphasizes the objective "to provide each member of the community with safe, ready access around, as well as in and out of the community, by a mode of transportation of individual choice with minimal environmental damage" (2013). The following objectives are included as part of the *Navajo Community Plan Circulation Element* (2013):

- Develop a balanced transportation system that adequately links the Navajo area to nearby communities as well as regional facilities.
- Encourage use of the integrated bus/LRT system to maximize the benefits of the transportation system and its ability to efficiently move people and goods.
- Develop a balanced transportation system that adequately accommodates the community's internal needs.
- Strive to separate automobile, pedestrian and bicycle conflicts and, where safe and practical, provide specially designated bikeways to accommodate the increased demand for this mode of travel.
- Encourage hillside view preservation in the design of new streets. Fit streets carefully into the topography to minimize grading to ensure that the street is compatible with the total landscape. The geology of an area may preclude or minimize grading in some specific cases.
- Create the San Diego River Pathway for bicycle and pedestrian users all along the south side of the San Diego River with connections to Mission Valley and Tierrasanta communities and Mission Trails Regional Park.

5.2.1.5 Analysis Methodology

A description of the methodology used in preparation of the traffic analysis is provided in Section 4.0 of the Traffic Impact Analysis (Appendix B of this PEIR). The analysis was prepared in accordance with the *City of San Diego Traffic Impact Study Manual (1998)*, *City of San Diego Trip Generation Manual (2003)*, *2000 Highway Capacity Manual (HCM)*, *Caltrans District 11 Guidelines*, and the *City of San Diego Significance Determination Thresholds (2011)*.

A. Study Area

As analyzed in the existing condition, the traffic study area consists of 20 roadway intersections, 27 roadway segments, 4 freeway segments, and 4 ramp meters.

B. Analysis Approach

The following analysis considered two different scenarios:

- Existing (without Project)
- Year 2030 (with Project)

C. Methodology

Level of Service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS provides an index to the operational qualities of a roadway segment or an intersection. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS designation is reported differently for signalized and unsignalized intersections, as well as for roadway segments.

- ***Signalized intersections*** were analyzed under AM and PM peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 16 of the *2000 Highway Capacity Manual (HCM)*, with the assistance of the *Synchro* version 7 computer software. The delay values (represented in seconds) were qualified with a corresponding intersection LOS.
- ***Unsignalized intersections*** were analyzed under AM and PM peak hour conditions. Average vehicle delay and LOS was determined based upon the procedures found in Chapters 17 of the *2000 Highway Capacity Manual (HCM)*, with the assistance of the *Synchro* 7 computer software.
- ***Street segment*** analysis is based upon the comparison of daily traffic volumes (ADTs) to the City of San Diego's *Roadway Classification, LOS, and ADT Table*. This table provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics.
- ***Freeway segments*** were analyzed during the AM and PM peak hours based on the methodologies developed by Caltrans District 11. Freeway segment LOS is based on the volume to capacity ratio on the freeway.

The analysis of freeway segment LOS is based on the procedure developed by Caltrans District 11 guidelines. The procedure involves comparing the peak hour volume of the mainline segment to the theoretical capacity of the roadway (V/C). The procedure for calculating freeway LOS involves the estimation of volume to capacity (V/C) ratio using the following equation:

V/C = (Daily Volume * Peak Hour Percent * Directional Factor * Truck Factor) / Capacity

Daily Volume = Average Daily Traffic (ADT)
Peak Hour Percent = Percentage of ADT occurring during the peak hour.
Directional Factor = Percentage of peak hour traffic occurring in peak direction.
Truck Factor = Truck/terrain factor to represent influence of heavy vehicles & grades.
Capacity = 2,000 vehicles/lane/hour/lane for mainline, and 1,200 for auxiliary lanes.

The resulting V/C is then compared to accepted ranges of V/C values corresponding to the various LOS for each facility classification, as shown in Table 5.2-6. The corresponding LOS represents an approximation of existing or anticipated future freeway operating condition in the peak direction of travel during the peak hour.

Table 5.2-6
Caltrans District 11 Freeway Segment Level Of Service Definitions

LOS	V/C	Congestion/Delay	Traffic Description
Used for freeways, expressways and conventional highways			
A	<0.41	None	Free flow
B	0.42-0.62	None	Free to stable flow, light to moderate volumes.
C	0.63-0.80	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted
D	0.81-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
E	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
Used for freeways and expressways			
F(0)	1.01-1.25	Considerable 0-1 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go.
F(I)	1.26-1.35	Severe 1-2 hour delay	Very heavy congestion, very long queues.
F(2)	1.36-1.45	Very Severe 2-3 hour delay	Extremely heavy congestion, longer queues, more numerous breakdown points, longer stop periods.
F(3)	>1.46	Extremely Severe 3+ hours of delay	Gridlock

Source: LLG, 2013

5.2.2 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds dated January 2011, a project is considered to have a significant impact if project traffic would decrease the operations of surrounding roadways by a defined threshold. For projects deemed complete on or after January 1, 2011, the City's defined thresholds are shown in Table 5.2-7.

Table 5.2-7
City Of San Diego Traffic Impact Significant Thresholds

Level of Service with Project[b]	Allowable Increase Due to Project Impacts[a]					
	Freeways		Roadway Segments		Intersections	Ramp Metering[c]
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
E	0.010	1.0	0.02	1.0	2.0	2.0
F	0.005	0.5	0.01	0.5	1.0	1.0

Source: LLG, 2013. a: If a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that would restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see note b), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating the project's direct significant and/or cumulatively considerable traffic impacts. b: All LOS measurements are based upon Highway Capacity Manual procedures for peak-hour conditions. However, V/C ratios for roadway segments are estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City's Traffic Impact Study Manual). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped locations). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive. c: The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS E is 2 minutes. The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS F is 1 minute. Delay = Average control delay per vehicle measured in seconds for intersections or minutes for ramp meters; LOS = Level of Service; V/C = Volume to Capacity ratio; Speed = Arterial speed measured in miles per hour

According to the City's CEQA Significance Determination Thresholds, an impact is designated either a "direct" or "cumulative" impact, which are defined as follows:

> *"Direct* traffic impacts are those projected to occur at the time a proposed development becomes operational, including other developments not presently operational but which are anticipated to be operational at that time (opening day)."
>
> *"Cumulative* traffic impacts are those projected to occur at some point after a proposed development becomes operational, such as during subsequent phases of a project and when additional proposed developments in the area become operational (short-term cumulative) or when affected community plan area reaches full planned build out (Horizon Year cumulative)."
>
> It is possible that a project's opening day (direct) impacts may be reduced in the long term, as future projects develop and provide additional roadway improvements (for instance, through implementation of traffic phasing plans). In such a case, the project may have direct impacts but not contribute considerably to a cumulative impact."
>
> For intersections and roadway segments affected by a project, LOS D or better is considered acceptable under both direct and cumulative conditions.

The project site is located in the City of San Diego. According to the City of San Diego's CEQA Significance Determination Thresholds, impacts to transportation/circulation would be considered significant if:

- *If any intersection, roadway segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in Table 5.2-7;*
- *At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in Table 5.2-7;*
- *If a project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp, the impact may be significant;*
- *The project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp as shown in Table 5.2-7;*
- *If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g. poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant;*
- *If a project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with the other existing or planned roadways; and/or,*
- *If a project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant.*

A project is considered to have a significant impact if project traffic would decrease the operations of surrounding roadways by a defined threshold. If a project exceeds the thresholds in Table 5.2-7, then the project is considered to have a "direct" or "cumulative" project impact. A significant impact can also

occur if a project causes the LOS to degrade from D to E, even if the allowable increases in Table 5.2-7 are not exceeded. A feasible mitigation measure would need to be identified to return the impact within the City thresholds, or the impact would be considered significant and unavoidable.
Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

Issue 1: Traffic Load and Capacity

Issue 1: Would the proposed FPA result in an increase in an increase in project traffic which is substantial in relation to the existing traffic load and capacity of the street system?

Analysis of the projected traffic load and capacity impacts to the local street system, including intersections and roadway segments for the Existing without Project and the Year 2030 with project scenarios, is discussed in the following sections.

5.2.2.1 Impact Analysis

A. Project Trip Generation, Distribution and Assignment

The proposed FPA includes a land use amendment to convert a mostly commercial and industrial area to a mixed-use transit-oriented residential development. The smart growth land uses proposed are expected to promote interaction within the land uses on-site and encourage public transit. Such developments generally generate fewer vehicle trips and less demand for parking as compared to conventional suburban developments due to the synergy of land uses and increased activity of transit, walking, and bicycle trips.

The proposed FPA includes two project features, which would be included with implementation of the proposed FPA. Figure 5.2-3A & B shows the assumed Year 2030 with project condition utilized in the analysis.

- **Alvarado Canyon Road Alignment:** Realign Alvarado Canyon Road to connect with the Fairmount Avenue/Mission Gorge Road intersection from the east. This feature is identified as project #T12 in the Navajo PFFP.
- **Mission Gorge Place Extension**: Extend Mission Gorge Place from Mission Gorge Road to the west 680 feet to Fairmount Avenue as a two-lane collector street. This feature is identified as project #T21 in the Navajo PFFP.

The future traffic volumes presented in this report are based on output from the SANDAG Regional Series 11 Traffic Model~~Using the City of San Diego's trip generation rates based on the SANDAG Regional Series 11 Traffic Model~~. The traffic model provided forecasted ADT volumes for the proposed FPA scenario. Year 2030 with project traffic volumes are identified in Figure 5.2-4A & B below.



SOURCE: 2014, SanGIS, 2014: City of San Diego,2014

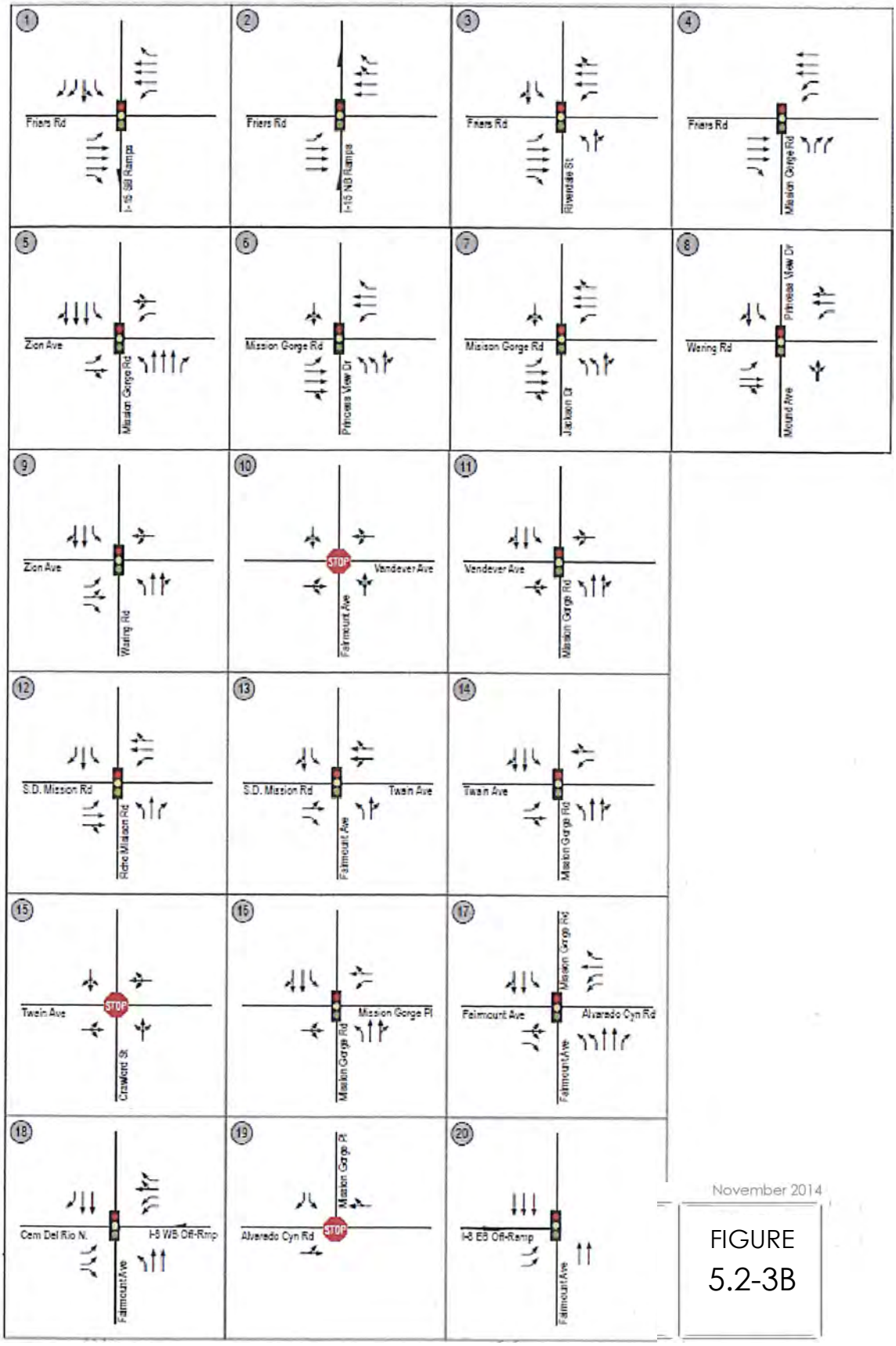
November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

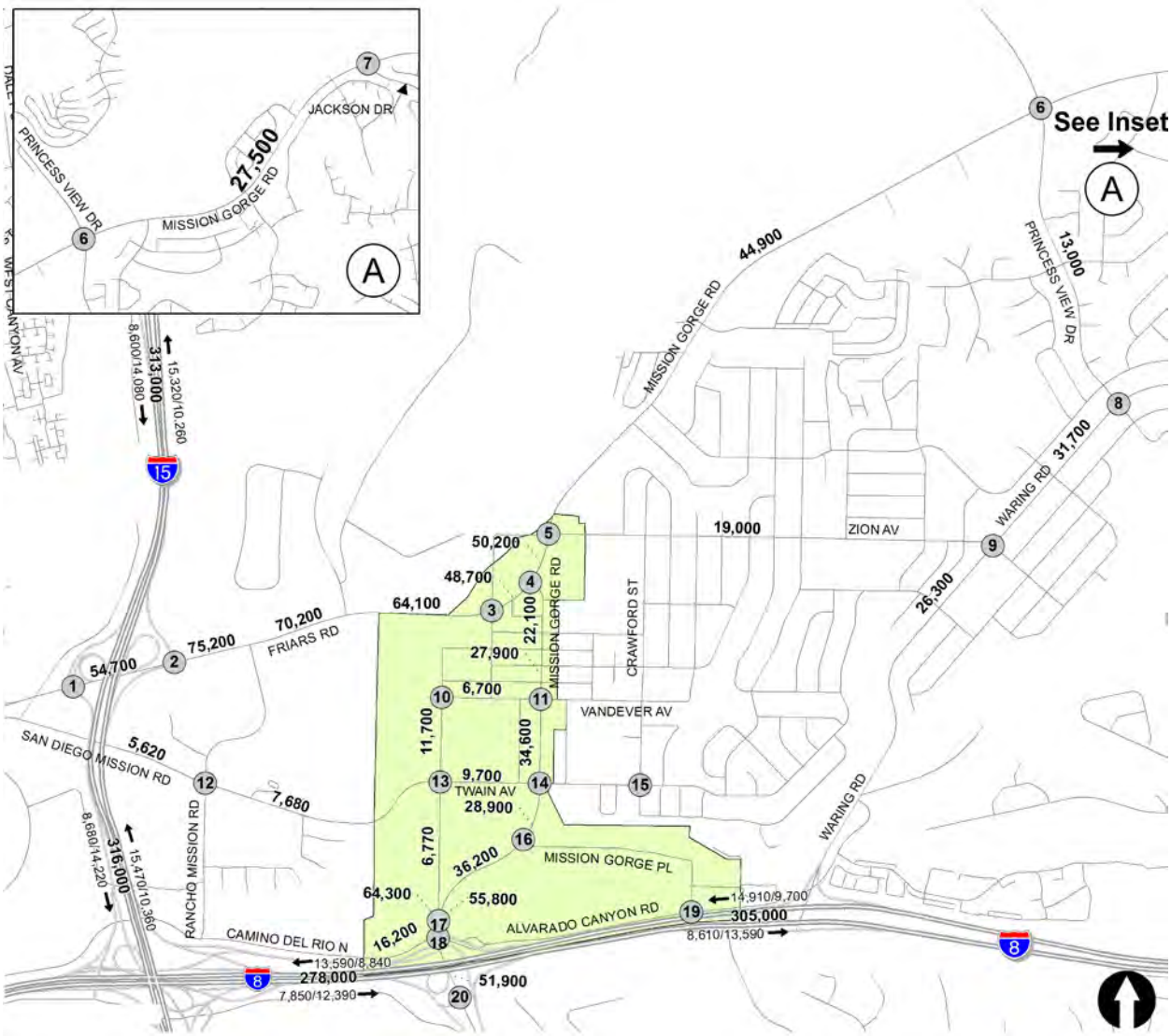
Year 2030 with Project Conditions

FIGURE
5.2-3A



November 2014

FIGURE
5.2-3B



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014

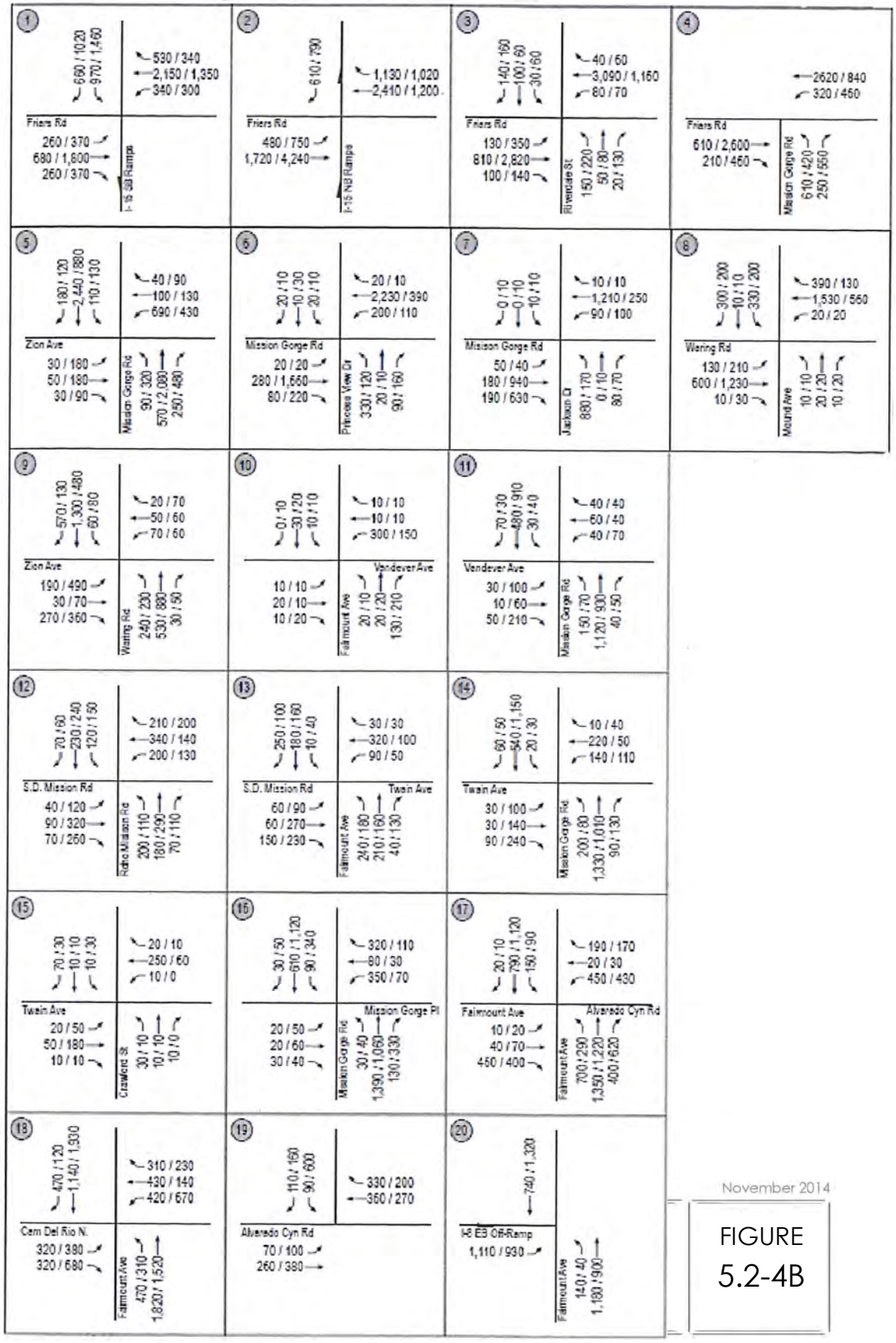
November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Year 2030 with Project Traffic Volumes

FIGURE 5.2-4A



November 2014

FIGURE
5.2-4B

B. Year 2030 with Project Intersection Operations

As shown in the Table 5.2-8, all intersections are calculated to operate at LOS E or F during the AM and/or PM peak hours:

- Friars Road / I-15 SB Ramps (LOS F during the AM and the PM peak hours);
- Friars Road / Riverdale Street (LOS F during the AM and the PM peak hours);
- Mission Gorge Road / Zion Avenue (LOS F during the AM and the PM peak hours);
- Mission Gorge Road / Princess View Drive (LOS F during the AM peak hour);
- Waring Road / Princess View Drive (LOS E during the AM peak hour);
- Waring Road / Zion Avenue (LOS F during the AM peak hour and LOS E during the PM peak hour);
- Fairmount Avenue / Mission Gorge Road (LOS E during the AM and PM peak hours);
- Fairmount Avenue / Alvarado Canyon Road/ I-8 WB Off-Ramp / Camino Del Rio N. (LOS F during the AM and PM peak hours); and
- Alvarado Canyon Road / Mission Gorge Place (LOS F during the AM and PM peak hours).

C. Year 2030 with Project Street Segment Operations

As shown in the Table 5.2-9, all street segments are calculated to operate at LOS E or F during the AM and/or PM peak hours:

- Friars Road: I-15 NB Ramps to Rancho Mission Road (LOS F);
- Friars Road: Rancho Mission Road to Santo Road (LOS F);
- Friars Road: Santo Road to Riverdale Street (LOS F);
- Mission Gorge Road: Rainier Avenue to Vandever Avenue (LOS E);
- Mission Gorge Road: Vandever Avenue to Twain Avenue (LOS F);
- Mission Gorge Road: Twain Avenue to Mission Gorge Place (LOS E);
- Mission Gorge Road: Mission Gorge Place to Fairmount Avenue (LOS F);
- Fairmount Avenue: Vandever Avenue to Twain Avenue (LOS F);
- Fairmount Avenue: Mission Gorge Road to Alvarado Canyon Road (LOS F);
- Fairmount Avenue: Alvarado Canyon Road to I-8 WB Ramps (LOS F);
- Fairmount Avenue: I-8 WB Ramps to I-8 EB Ramps (LOS F);
- Vandever Avenue: Riverdale Street to Mission Gorge Road (LOS E);
- Twain Avenue: Fairmount Avenue to Mission Gorge Road (LOS F);
- San Diego Mission Road: Rancho Mission Road to Fairmount Avenue (LOS F); and
- Zion Avenue: Mission Gorge Road to Waring Road (LOS F).

5.2.2.2 Significance of Impact

The project impacts were based on the Year 2030 with project conditions compared to the existing conditions. Per the City's significance thresholds and the analysis methodology, as described in Table 5.2-10BB, several intersections and roadway segments have been determined to result in significant cumulative impacts. As shown in Table 5.2-8, the following City streets intersections would have a significant cumulative impact:

- Friars Road/Riverdale Street (LOS F during the AM and PM peak hours);
- Mission Gorge Road/Zion Avenue (LOS F during the AM and PM peak hours);
- Mission Gorge Road/Princess View Drive (LOS F during the AM peak hour);
- Waring Road/Princess View Drive (LOS F during the AM peak hour);
- Waring Road/Zion Avenue (LOS F during the AM peak hour or LOS E during the PM peak hour);
- Fairmount Avenue/Mission Gorge Road (LOS F during the AM ~~and PM~~ peak hours);
- Fairmount Avenue/Alvarado Road/Camino Del Rio N. (LOS F during the AM and PM peak hour); and,
- Alvarado Canyon Road/Mission Gorge Place (LOS F during the AM and PM peak hours).

As shown in Table 5.2-9, the following roadway segments would have a significant cumulative impact:

- Friars Road: I-15 NB Ramps to Rancho Mission Road (LOS F);
- Friars Road: Rancho Mission Road to Santo Road (LOS F);
- Friars Road: Santo Road to Riverdale Street (LOS F);
- Mission Gorge Road: Mission Gorge Place to Fairmount Avenue (LOS E);
- Mission Gorge Road: Rainier Avenue to Vandever Avenue (LOS E);
- Mission Gorge Road: Vandever Avenue to Twain Avenue (LOS F);
- Mission Gorge Road: Twain Avenue to Mission Gorge Place (LOS E);
- Fairmount Avenue: Vandever Avenue to Twain Avenue (LOS F):
- Fairmount Avenue: Mission Gorge Road to Alvarado Canyon Road (LOS F);
- Fairmount Avenue: Alvarado Canyon Road to I-8 WB Ramps (LOS F);
- Fairmount Avenue: I-8 WB Ramps to I-8 EB Ramps (LOS F);
- Vandever Avenue: Riverdale Street to Mission Gorge Road (LOS E);
- Twain Avenue: Fairmount Avenue to Mission Gorge Road (LOS F);
- San Diego Mission Road: Rancho Mission Road to Fairmount Avenue (LOS F); and,
- Zion Avenue: Mission Gorge Road to Waring Road (LOS F).
- ~~Friars Road/I-15 SB ramps~~

Table 5.2-8
Year 2030 with Project Intersection Operations

Intersection	Peak Hour	Existing		Year 2030 With Project		Delay Increase	Sig?[c]
		Delay[a]	LOS[b]	Delay	LOS		
1. Friars Road / I-15 SB Ramps	AM	**76.8**	**E**	**>100**	**F**	**<10**	**Yes**
	PM	**90.8**	**F**	**95.7**	**F**	**4.90**	**Yes**
2. Friars Road / I-15 NB Ramps	AM	24.0	C	35.2	D	<10	No
	PM	22.0	C	25.0	C	3.00	No
3. Friars Road / Riverdale Street	AM	**33.1**	**C**	**>100**	**F**	**<10**	**Yes**
	PM	**57.8**	**E**	**>100**	**F**	**<10**	**Yes**
4. Friars Road / Mission Gorge Road	AM	18.5	B	42.3	D	<10	No
	PM	29.1	C	53.9	D	<10	No
5. Mission Gorge Road / Zion Avenue	AM	**>100**	**F**	**>100**	**F**	**<10**	**Yes**
	PM	**52.1**	**D**	**>100**	**F**	**<10**	**Yes**
6. Mission Gorge Road / Princess View Drive	AM	**51.0**	**D**	**97.0**	**F**	**<10**	**Yes**
	PM	20.5	C	25.8	C	5.30	No
7. Mission Gorge Road / Jackson Drive	AM	32.9	C	41.7	D	8.80	No
	PM	21.0	C	23.6	C	2.60	No
8. Waring Road / Princess View Drive	AM	**24.2**	**C**	**77.9**	**E**	**<10**	**Yes**
	PM	11.9	B	19.1	B	7.20	No
9. Waring Road / Zion Avenue	AM	**41.9**	**D**	**>100**	**F**	**<10**	**Yes**
	PM	**47.5**	**D**	**73.5**	**E**	**<10**	**Yes**
10. Fairmount Avenue / Vandever Avenue	AM	12.7	B	14.2	B	1.50	No
	PM	9.0	A	9.4	A	0.40	No
11. Mission Gorge Road / Vandever Avenue	AM	18.1	B	18.6	B	0.50	No
	PM	32.1	C	33.0	C	0.90	No
12. San Diego Mission Road / Rancho Mission Road	AM	24.4	C	29.7	C	5.30	No
	PM	21.9	C	26.8	C	4.90	No
13. Fairmount Avenue / Twain Avenue	AM	20.8	C	35.5	D	<10	No
	PM	20.6	C	23.7	C	3.10	No
14. Mission Gorge Road / Twain Avenue	AM	25.8	C	34.7	C	8.90	No
	PM	28.8	C	38.4	D	9.60	No
15. Twain Avenue / Crawford Street	AM	9.2	A	10.6	B	1.40	No
	PM	8.9	A	9.2	A	0.30	No
16. Mission Gorge Road / Mission Gorge Place	AM	12.6	B	49.1	D	<10	No
	PM	14.1	B	38.6	D	<10	No
17. Fairmount Avenue / Mission Gorge Road~~Place~~	AM	**31.8**	**C**	**60.1**	**E**	**<10**	**Yes**
	PM	31.8	C	45.7	D	<10	No
18. Fairmount Avenue / Alvarado Canyon Road / Camino Del Rio N.	AM	**72.8**	**E**	**>100**	**F**	**<10**	**Yes**
	PM	**>100**	**F**	**>100**	**F**	**<10**	**Yes**
19. Alvarado Canyon Road / mission Gorge Place	AM	**10.3**	**B**	**62.7**	**F**	**<10**	**Yes**
	PM	**12.8**	**B**	**>100**	**F**	**<10**	**Yes**
20. Fairmount Avenue / I-8 EB Off-Ramp	AM	**25.4**	**C**	**36.9**	**D**	**<10**	No
	PM	**14.9**	**B**	**19.2**	**B**	**4.30**	No

Footnotes:

d. Average delay expressed in seconds per vehicle.
e. Level of Service.
f. AWSC – All-Way Stop Controlled intersection. Minor street left turn delay is reported.

General Notes:

Bold typeface indicates intersections operating at LOS E or F

Source: LLG, 2014.

Table 5.2-9
Year 2030 with Project Street Segment Operations

Street Segment	Existing Capacity (LOS E) [a]	Existing			Year 2030 + Project Capacity (LOS E)	Year 2030 With Project			Δe	Sig?[f]
		ADT [b]	LOS[c]	V/C [d]		ADT	LOS	V/C		
Friars Road										
I-15 SB Ramps to I-15 NB Ramps	60,000	48,250	C	0.804	60,000	54,700	D	0.912	0.108	No
I-15 NB Ramps to Rancho Mission Rd	65,000	**54,410**	**D**	**0.837**	**65,000**	**75,200**	**F**	**1.157**	**0.320**	**Yes**
Rancho Mission Rd to Santo Rd	65,000	**54,410**	**D**	**0.837**	**65,000**	**70,200**	**F**	**1.080**	**0.243**	**Yes**
Santo Rd to Riverdale Rd	60,000	**43,360**	**C**	**0.723**	**60,000**	**64,100**	**F**	**1.068**	**0.346**	**Yes**
Riverdale Rd to Mission Gorge Rd	60,000	35,560	C	0.593	60,000	48,700	C	0.812	0.219	No
Mission Gorge Road										
Jackson Dr to Princess View Dr	50,000	19,480	A	0.390	50,000	27,500	B	0.550	0.160	No
Princess View Dr to Zion Ave	60,000	21,740	A	0.362	60,000	44,900	C	0.748	0.386	No
Zion Ave to Friars Rd	60,000	37,470	C	0.625	60,000	50,200	D	0.837	0.212	No
Friars Rd to Rainier Ave	30,000	17,650	C	0.588	30,000	22,100	D	0.737	0.148	No
Rainier Ave to Vandever Ave	30,000	**17,710**	**C**	**0.590**	**30,000**	**27,900**	**E**	**0.930**	**0.340**	**Yes**
Vandever Ave to Twain Ave	30,000	**30,730**	**F**	**1.024**	**30,000**	**34,600**	**F**	**1.153**	**0.129**	**Yes**
Twain Ave to Mission Gorge Pl	30,000	**24,660**	**D**	**0.822**	**30,000**	**28,900**	**E**	**0.963**	**0.141**	**Yes**
Mission Gorge Pl to Fairmount Ave	30,000	**25,260**	**E**	**0.842**	**30,000**	**38,200**	**F**	**1.273**	**0.431**	**Yes**
Fairmount Avenue										
Vandever Ave to Twain Ave	8,000	**5,490**	**D**	**0.686**	**8,000**	**11,700**	**F**	**1.463**	**0.776**	**Yes**
Twain Ave to Mission Gorge Rd	15,000	6,770	B	0.451	15,000	11,000	D	0.733	0.282	No
Mission Gorge Rd to Alvarado Canyon Rd	40,000	**34,290**	**D**	**0.857**	**40,000**	**55,800**	**F**	**1.395**	**0.538**	**Yes**
Alvarado Canyon Rd to I-8 WB Ramps	40,000	**47,690**	**F**	**1.192**	**40,000**	**64,300**	**F**	**1.608**	**0.415**	**Yes**
I-8 WB Ramps to I-8 EB Ramps	40,000	**34,670**	**D**	**0.867**	**40,000**	**51,900**	**F**	**1.298**	**0.431**	**Yes**
Vandever Avenue										
Riverdale St to Mission Gorge Rd	8,000	**5,600**	**D**	**0.700**	**8,000**	**6,700**	**E**	**0.838**	**0.138**	**Yes**
Twain Avenue										
Fairmount Ave to Mission Gorge Rd	8,000	**5,100**	**D**	**0.638**	**8,000**	**9,700**	**F**	**1.213**	**0.575**	**Yes**

Table 5.2-9, cont.
Year 2030 with Project Street Segment Operations

Street Segment	Existing Capacity (LOS E) a	Existing			Year 2030 + Project Capacity (LOS E)	Year 2030 With Project			Δe	Sig?[f]
		ADT[b]	LOS[c]	V/C[d]		ADT	LOS	V/C		
San Diego Mission Road										
West of Rancho Mission Rd	40,000	5,620	A	0.141	40,000	17,000	B	0.425	0.285	No
Rancho Mission Rd to Fairmount Ave	15,000	**7,680**	**C**	**0.512**	**15,000**	**17,000**	**F**	**1.133**	**0.621**	**Yes**
Waring Road										
Princess View Dr to Zion Ave	40,000	16,360	B	0.409	40,000	31,700	D	0.793	0.384	No
Zion Ave to Orcutt Ave	40,000	16,630	B	0.416	40,000	26,300	C	0.658	0.242	No
Zion Avenue										
Mission Gorge Rd to Waring Rd	15,000	**10,760**	**D**	**0.717**	**15,000**	**19,000**	**F**	**1.297**	**0.549**	**Yes**
Princess View Drive										
Mission Gorge Rd to Waring Rd	40,000	4,740	A	0.119	40,000	13,000	A	0.325	0.207	No
Camino Del Rio North										
Fairmount Ave to Ward Rd	30,000	11,220	B	0.374	30,000	16,200	C	0.540	0.166	No

Footnotes:

a. Capacity based on roadway classification operating at LOS E.

b. Average Daily Traffic.

c. Level of Service.

d. Volume to Capacity.

e. Δ denotes a project-induced increase in the Volume to Capacity (V/C) ratio.

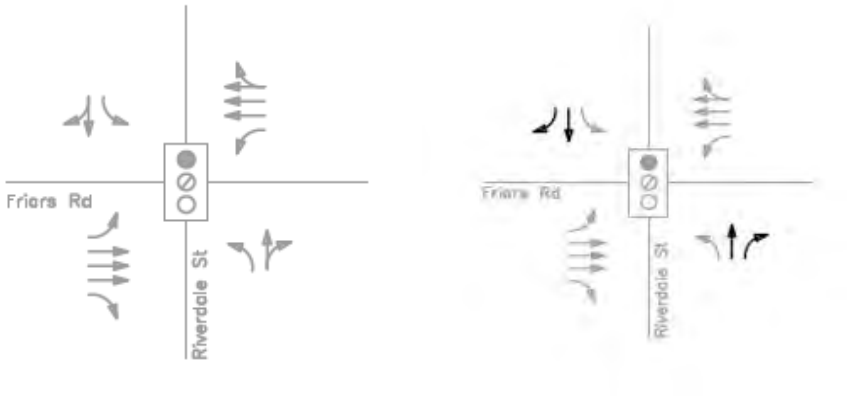
f. Sig = Significant project impact based on Significance Criteria.

5.2.2.3 Mitigation Framework

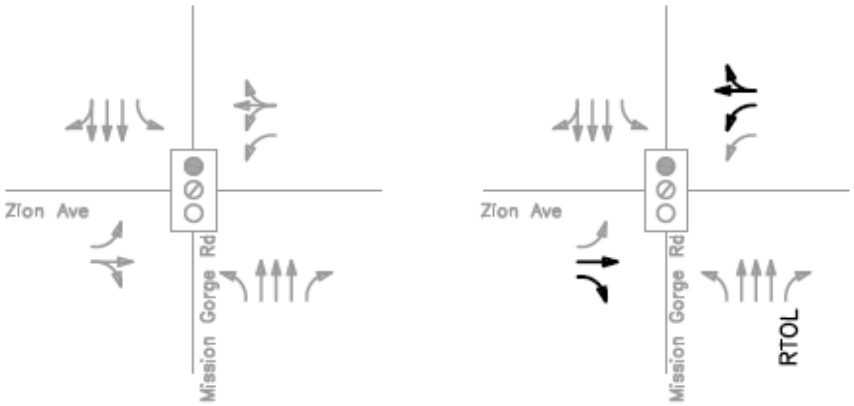
The following mitigation measures are recommended for the intersections and roadways that would have a significant impact. ~~Feasibility of the measures described below is provided in the feasibility sketches of Appendix B of this PEIR.~~ All ~~feasible~~ mitigation measures identified below should be constructed per the City of San Diego's public road standards~~ and as depicted in the feasibility sketches~~. The following identified mitigation measures will be implemented pursuant to the PFFP as development occurs. Until funding is identified and available, impacts to the following locations would remain significant and unmitigated.

Intersection Mitigation Measures:

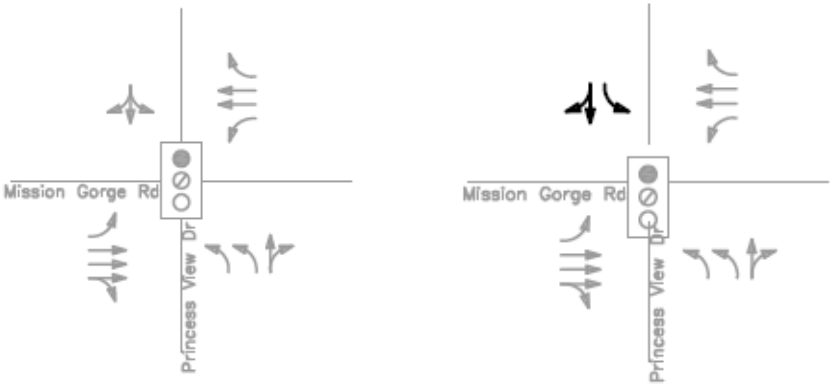
T-1 **Friars Road / Riverdale Street:** Restripe northbound and southbound approaches to provide one left-turn lane, one through lane, and one right-turn lane. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T22).



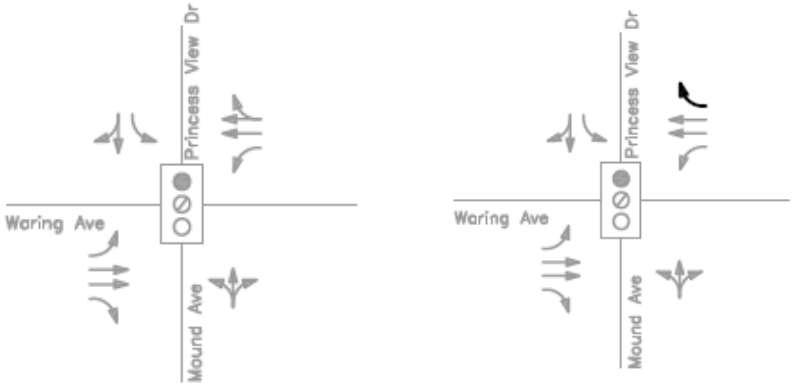
T-2 **Mission Gorge Road / Zion Avenue:** Restripe westbound approach to provide dual left-turn lanes and a through/right-turn lane. Restripe eastbound approach to provide a dedicated right-turn lane. Also, remove the east-west split phase to provide protected left-turn phases. Even with the mitigation measures identified above, the FPA significant traffic impact to this intersection would be significant and unavoidable. ~~The FPA significant traffic impact to this intersection would be Partiallyfully mitigated with the implementation of these mitigation measures.~~ This proposed intersection improvement project is identified in the Navajo PFFP (#T23).



T-3 **Mission Gorge Road / Princess View Drive:** Restripe southbound approach to provide a dedicated left-turn lane and a shared right-turn/through lane. Also, remove the split phase and provided protected left-turn phases. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T24).



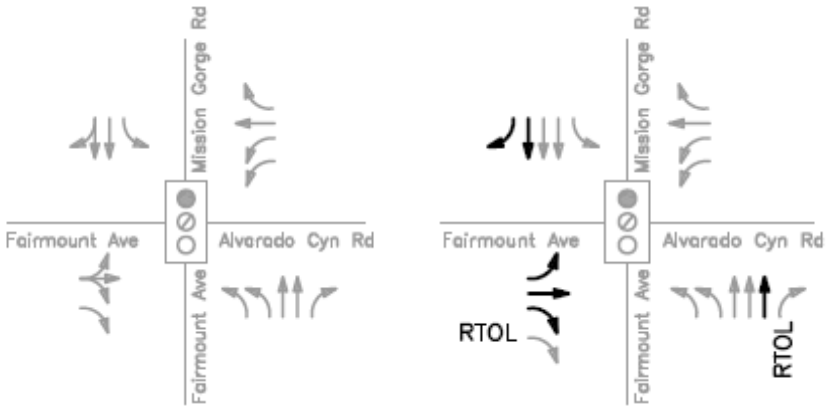
T-4 **Waring Road / Princess View Drive:** Restripe westbound approach to provide a dedicated right-turn lane. Prohibit street parking along the westbound approach. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T25).



T-5 **Waring Road / Zion Avenue:** Restripe southbound approach to provide a dedicated right-turn lane. Prohibit street parking along the southbound approach. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T26).



T-6 **Fairmount Avenue / Mission Gorge Road:** Widen the northbound approach to provide an additional (third) through lane. Provide a northbound right-turn overlap phase. Widen the southbound approach to provide three through lanes and a dedicated right-turn lane. Widen the eastbound approach to provide one left-turn lane, one through lane, and two right-turn lanes with overlap phasing. Also, remove the east-west split phase to provide protected left-turn phases. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. The Alvarado Canyon Road Realignment Project proposed at this location is identified in the Navajo PFFP (#T12).



T-7 **Alvarado Canyon Road / Mission Gorge Place:** Install a traffic signal at this intersection once traffic signal warrants analysis is complete ~~it is warranted~~. Widen the westbound approach to provide an exclusive right-turn lane. Widen the eastbound approach to provide a dedicated left-turn lane. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T27).



Segments:

T-8 **Friars Road from I-15 NB Ramps to Rancho Mission Road:** Widen the roadway to 8-Lane Prime Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. ~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure.~~ This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Even if the Mission Valley PFFP were amended and the Mission Valley Community Plan were updated, until the Mission Valley PFFP is fully funded, the traffic impact to this roadway segment would be significant and unmitigated. ~~Therefore, the FPA significant traffic impact to this roadway segment would remain significant unmitigated.~~

T-9 **Friars Road from Rancho Mission Road to Santo Road:** Widen the roadway to 8-Lane Prime Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Even if the Mission Valley PFFP were amended and the Mission Valley Community Plan were updated, until the Mission Valley PFFP is fully funded, the traffic impact to this roadway segment would be significant and unmitigated. ~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure. This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Therefore, the FPA significant traffic impact to this roadway segment would remain significant and unmitigated.~~

T-10 **Friars Road: Santo Road to Riverdale Street:** This roadway segment is currently built to its ultimate classification consistent with the Mission Valley and Navajo Community Plans. No mitigation measures have been identified for this location. As a result, the FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

T-11 **Mission Gorge Road from Rainier Avenue to Vandever Avenue:** Widen the roadway to a 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvement Project is identified in the Navajo PFFP (#T19).

T-12 **Mission Gorge Road from Vandever Avenue to Twain Avenue:** Widen the roadway to a 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).

T-13 **Mission Gorge Road from Twain Avenue to Mission Gorge Place:** Widen the roadway to a 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).

T-14 **Mission Gorge Road from Mission Gorge Place to Fairmount Avenue:** Widen the roadway to 6-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T16).

T-15 **Fairmount Avenue from Vandever Avenue to Twain Avenue:** Provide a continuous two-way left-turn lane. Retain the street parking along both sides of the roadway. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T20).

T-16 **Fairmount Avenue from Mission Gorge Road to Alvarado Canyon Road:** Widen the roadway to a 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. ~~Even with this improvement, the FPA traffic impact to this roadway segment is significant. The improvement for this roadway segment would only partially mitigate the FPA traffic impact.~~ The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).

T-17 **Fairmount Avenue from Alvarado Canyon Road to I-8 WB Ramps:** Widen the roadway to 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. ~~Even with this improvement, the FPA traffic impact to this roadway segment is significant. The improvement for this roadway segment would only partially mitigate the FPA traffic impact.~~ The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).

T-18 **Fairmount Avenue from I-8 WB Ramps to I-8 EB Ramps:** Widen the roadway to 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. ~~Even with this improvement, the FPA traffic impact to this roadway segment is significant. The improvement for this roadway segment would only partially mitigate the FPA traffic impact.~~ The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).

T-19 **Vandever Avenue from Riverdale Street to Mission Gorge Road:** Restripe to provide a continuous two-way left-turn lane. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T28).

T-20 **Twain Avenue from Fairmount Avenue to Mission Gorge Road:** Restripe to provide a continuous two-way left-turn lane. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T29).

T-21 **San Diego Mission Road from Rancho Mission Road to Fairmount Avenue:** Widening the roadway to a 4-Lane Collector Street would mitigate the FPA significant impact to San Diego Mission Road. However, widening of this roadway to a 4-Lane Collector would require bridge widening over the San Diego River. The widening of this roadway would impact the San Diego River, wetlands, biological resources, and may conflict with the San Diego River Park Master Plan. Therefore, widening of the San Diego Mission Road and bridge widening are not recommended. ~~which is not included in any Public Facilities Financing Plan or funded Capital Improvement Program.~~ Therefore, The FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

T-22 **Zion Avenue from Mission Gorge Road to Waring Road:** Widening the roadway to a 4-Lane Major Street would mitigate The FPA significant impact to Zion Avenue. Widening of this roadway would impact surrounding residential properties, community character and on-street parking that is heavily utilized in this area. Therefore widening of this roadway segment is not recommended and The FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

5.2.2.4 Impacts After Mitigation

Table 5.2-10 summarizes the mitigation intersection analysis operations and Table 5.2-11 summarizes the mitigated roadway improvement segment analysis operations for the Year 2030 with project scenario. With implementation of the recommended mitigations measures, the proposed FPA would improve the current intersection and street segment conditions; however, several mitigation measures are not feasible; therefore, traffic impacts to intersections and roadway segments in the Year 2030 scenario with the implementation of the proposed FPA would be considered cumulatively significant and unmitigable. Until funding is identified and available, impacts to the following locations would remain significant and unmitigated.

Table 5.2-10
Post-Mitigation Intersection Operations

Intersection	Peak Hour	Existing		Year 2030 With Project		Year 2030 with Project with Mitigation	
		Delay[a]	LOS[b]	Delay	LOS	Delay	LOS
Friars Road / Riverdale Street	AM	33.1	C	150.2	F	54.0	D
	PM	57.8	E	172.8	F	45.1	D
Mission Gorge Road / Zion Avenue	**AM**	**349.8**	**F**	**507.0**	**F**	**240.1**	**F**
	PM	52.1	D	108.1	F	54.7	D
Mission Gorge Road / Princess View Drive	AM	51.0	D	97.0	F	46.9	D
	PM	20.5	C	25.8	C	25.4	C
Waring Road / Princess View Drive	AM	24.2	C	77.9	E	42.9	D
	PM	11.9	B	19.1	B	18.7	B
Waring Road / Zion Avenue	AM	41.9	D	126.3	F	43.5	D
	PM	47.5	D	73.5	E	40.5	D
Fairmount Avenue / Mission Gorge Road	AM	31.8	C	60.1	E	39.3	D
	PM	31.9	C	45.7	D	24.4	C
Alvarado Canyon Road / Mission Gorge Place	AM	9.5	B	62.7	F	15.5	B
	PM	11.5	B	192.9	F	21.1	C

Footnotes: a. Average delay expressed in seconds per vehicle. b. Level of Service.
General Notes: **Bold** typeface indicates intersections operating at LOS E or F
Source: LLG, 2014

Table 5.2-11: Post-Mitigation Segment Operations

Street Segment	Existing				Year 2030 + Project				Year 2030 + Project + Mitigation			
	Capacity (LOS E) [a]	ADT [b]	V/C [d]	LOS [c]	Capacity (LOS E) [a]	ADT [b]	V/C [d]	LOS [c]	Capacity (LOS E) [a]	ADT [b]	V/C [d]	LOS [c]
Friars Road												
I-15 NB Ramps to Rancho Mission Road	65,000	**54,410**	**0.837**	**D**	65,000	75,200	1.157	F	65,000	**75,200**	**1.157**	**F**
Rancho Mission Road to Santo Road	65,000	**54,410**	**0.837**	**D**	65,000	70,200	1.080	F	65,000	**70,200**	**1.080**	**F**
Santo Road to Riverdale Road	60,000	**43,360**	**0.723**	**C**	60,000	64,100	1.068	F	60,000	**64,100**	**1.068**	**F**
Mission Gorge Road												
Rainier Ave to Vandever Ave	30,000	17,710	0.59	C	30,000	27,900	0.93	E	40,000	27,900	0.6975	C
Vandever Ave to Twain Ave	30,000	30,730	1.024	F	30,000	34,600	1.153	F	40,000	34,600	0.865	D
Twain Ave to Mission Gorge Pl	30,000	24,660	0.822	D	30,000	28,900	0.963	E	40,000	28,900	0.7225	C
Mission Gorge Pl to Fairmount Ave	30,000	25,260	0.842	E	40,000	38,200	0.955	E	50,000	38,200	0.764	C
Fairmount Avenue												
Vandever Ave to Twain Ave	8,000	5,490	0.686	D	8,000	11,700	1.463	F	15,000	11,700	0.78	D
Mission Gorge Rd to Alvarado Canyon Rd	40,000	**34,290**	**0.857**	**D**	40,000	55,800	1.395	F	50,000	**55,800**	**1.116**	**F**
Alvarado Canyon Rd to I-8 WB Ramps	40,000	**47,690**	**1.192**	**F**	40,000	64,300	1.608	F	50,000	**64,300**	**1.286**	**F**
I-8 WB Ramps to I-8 EB Ramps	40,000	**34,670**	**0.867**	**D**	40,000	51,900	1.298	F	50,000	**51,900**	**1.038**	**F**
Vandever Avenue												
Riverdale St to Mission Gorge Rd	8,000	5,600	0.7	D	8,000	6,700	0.838	E	15,000	6,700	0.447	B
Twain Avenue												
Fairmount Ave to Mission Gorge Rd	8,000	5,100	0.638	D	8,000	9,700	1.213	F	15,000	9,700	0.647	C
San Diego Mission Road												
Rancho Mission Road to Fairmount Avenue	15,000	**7,680**	**0.512**	**C**	15,000	17,000	1.133	F	15,000	**17,000**	**1.133**	**F**
Zion Avenue												
Mission Gorge Road to Waring Road	15,000	10,760	0.717	D	15,000	19,000	1.267	F	15,000 ~~40,000~~	19,000 ~~19,000~~	1.267~~0~~ .475	**F**~~B~~

Footnotes: **a.** Capacity based on roadway classification operating at LOS E., **b.** Average Daily Traffic, **c.** Level of Service, **d.** Volume to Capacity.

5.2.3 Issue 2: Traffic Generation

Issue 2: Would the proposed FPA result in traffic generation in excess of specific community plan allocations?

5.2.3.1 Impact Analysis

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

Based on the calculated trip generation in accordance to the City of San Diego Trip Generation Manual (May 2003), the proposed FPA is calculated to generate approximately 27,360 new ADT with the reduction of 400 inbound trips and the addition of 2,573 outbound trips during the AM peak hour and the addition of 2,201 inbound trips and the reduction of 53 outbound trips during the PM peak hour. Implementation of the proposed FPA would increase density and ultimately result in a significant increase in traffic within the proposed FPA area. Table 5.2-12 provides the trip generation for the proposed FPA.

Furthermore, one of the objectives of this project is promote transit-oriented development and encourage alternative modes of transportation that reduce ~~the increased~~ traffic impacts. Mitigation measures T-23 through T-26 reference the Navajo Community Plan – Grantville CPIOZ Section as Supplemental Design Regulations, the City's Bike Master Plan, and Chapter 14 Article 2 Division 5 §142.0540 (c) Exceptions to Parking Regulations for Nonresidential Uses to ensure future development adheres to the proposed FPA's goals. Therefore, with the approval of the amendment to the Navajo Community Plan, and the implementation of Mitigation Measure T-1 to T-7, T-11 to T-20, T-23 to 26, traffic generation impacts related to the implementation of the proposed FPA would be reduced to a level less than significant.

5.2.3.2 Significance of Impact

With the implementation of Mitigation Measures T-1 to T-7, T-11 to T-20, T-23 to 26 ~~T-1 through T-22~~, described above, and the additional mitigation measures described below, the proposed FPA would not result in traffic generation in excess of the specific community plan allocation and impacts would be reduced to a level less than significant.

5.2.3.3 Mitigation Framework

Mitigation Measures T-1 to T-7, T-11 to T-20, T-23 to 26 ~~T-1 through T-22~~ as described in Section 5.2.3 of this PEIR shall be implemented. Additionally, the following mitigation measures shall be implemented to provide multimodal transportation options.

Table 5.2-12
Grantville FPA Trip Generation Summary

Land Use	City of SD Land Use Classification	Quantity			Daily Trip Ends (ADT) [a]		AM Peak Hour					PM Peak Hour				
		Existing Size	Total Proposed Size	Delta	Rate [b]	Volume	% of ADT	Total	In:Out Split	In	Out	% of ADT	Total	In:Out Split	In	Out
Residential Mixed-Use	Multi - Over 20 DU/Acre	0 DU	6,174 DU	6,174 DU	6 /DU	37,040	8%	2,963	20:80	593	2,370	9%	3,334	70:30	2,334	1,000
		Residential Mixed Use Reduction (10%ADT, 8%AM, 10%PM)				-3,700		-237		-47	-190		-333		-233	-100
		Residential Transit Reduction (5%ADT, 9%AM, 6%PM)				-1,670		-245		-49	-196		-180		-126	-54
		Subtotal				31,670		2,481		497	1,984		2,821		1,975	846
	Commercial Office	174.90 KSF	560.00 KSF	385.1 KSF	12.15 /KSF	4,680	13%	608	90:10	547	61	14%	655	20:80	131	524
		Office Mixed Use Reduction (3%ADT, 5%AM, 4%PM)				-140		-30		-27	-3		-26		-5	-21
		Office Transit Reduction (3%ADT, 5.5%AM, 2%PM)				-140		-32		-29	-3		-13		-3	-10
		Subtotal				4,400		546		491	55		616		123	493
	Strip Commercial	209.20 KSF	80.00 KSF	-129.20 KSF	40 /KSF	-5,170	4%	-207	60:40	-124	-83	11%	-569	50:50	-284	-285
	Industrial Park	764.7 KSF	0 KSF	-764.7 KSF	15 /KSF	-11,470	11%	-1,262	90:10	-1,136	-126	12%	-1,376	20:80	-275	-1,101
Commercial Mixed Use	Multi - Over 20 DU/Acre Multi - Under 20 DU/Acre	0 DU	1,396 DU	1,396 DU	6 /DU	8,380	8%	670	20:80	134	536	9%	754	70:30	528	226
		4 DU	307 DU	303 DU	8 /DU	2,420	8%	194	20:80	39	155	10%	242	70:30	169	73
		Residential Mixed Use Reduction (10%ADT, 8%AM, 10%PM)				-1,080		-69		-14	-55		-100		-70	-30
		Subtotal				9,720		795		159	636		896		627	269
	Commercial Office	142.9 KSF	309.0 KSF	166.1 KSF	14.93 /KSF	2,480	13%	322	90:10	290	32	14%	347	20:80	69	278
		Office Mixed Use Reduction (3%ADT, 5%AM, 4%PM)				-70		-16		-14	-2		-14		-3	-11
		Subtotal				2,410		306		276	30		333		66	267
	Strip Commercial	413.10 KSF	394.40 KSF	-18.70 KSF	40 /KSF	-750	4%	-30	60:40	-18	-12	11%	-83	50:50	-41	-42
	Industrial Park	626.8 KSF	250 KSF	-376.8 KSF	15 /KSF	-5,650	11%	-622	90:10	-560	-62	12%	-678	20:80	-136	-542
Multi Family Residential	Multi - Over 20 DU/Acre	97 DU	499 DU	402 DU	6 /DU	2,410	8%	193	20:80	39	154	9%	217	70:30	152	65
Office	Commercial Office	72.5 KSF	57.5 KSF	-15.0 KSF	14 /KSF	-210	13%	-27	90:10	-24	-3	14%	-29	20:80	-6	-23
Gross Total						**34,160**		**2,802**		**-220**	**3,022**		**2,814**		**2,641**	**173**
Mixed Use Reduction						-4,990		-352		-102	-250		-473		-311	-162
Transit Reduction						-1,810		-277		-78	-199		-193		-129	-64
Net Total						**27,360**		**2,173**		**-400**	**2,573**		**2,148**		**2,201**	**-53**

Development projects that comply with the supplemental regulations for CPIOZ-Type A and the regulations of the underlying zone~~, and can provide documentation from a California Registered Traffic Engineer stating that the proposed project's traffic volumes are based on the City's trip generation rates and are less than the thresholds established in the City of San Diego's Traffic Impact Study Manual~~ can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations ~~and generate traffic volumes greater than the City's thresholds~~ shall be subject to discretionary review in accordance with CPIOZ-Type B and the Mitigation Framework as detailed in Mitigation Measure T-23 through T-26, below.

T-23 Pedestrian Circulation Improvements:

- Provide minimum 5 foot non-contiguous sidewalks on both sides of any vehicular access way (including private drives that a project creates on its property). Vehicular access ways shall connect to existing alleys, streets and adjacent development. (SDR 17)
- Provide a minimum 5 foot planting zone and minimum 10 foot sidewalk. The planting zone shall be adjacent to the curb and the sidewalk shall be between the planting zone and the building. (SDR 18)
- All crosswalks shall meet City standard for high visibility (Continential) crosswalks (See Standard Drawing SDM-116). All transverse type crosswalks within the public right-of-way shall be upgraded to new City standard crosswalks per City Adoption of High Visilbity Crosswalks. Additionally, the Navajo Community Plan Grantville - CPIOZ Section includes an SDR for use of enhanced pavement pattern. Median refuge, curb extensions, countdown signals etc. shall be included per City standards and Street Design Manual.
- Development shall provide a minimum of one pedestrian (and bicycle) connection to each adjacent property. These pedestrian (and bicycle) connections shall be coordinated and connected. Fencing or walls that limit access are prohibited (SDR 21) beyond security considerations.
- Pedestrian connectivity to the San Diego River, the surrounding parks and transit shall be provided per the San Diego River Park Master Plan.
- Provide direct access to Alvarado Creek from common areas and ground floor units. (SDR 38) and development along Alvarado Creek shall provide a 10 foot wide pedestrian and bicycle trail adjacent to the Alvarado Creek. (SDR 29)
- Provide a bridge at Mission Gorge/Fairmount Ave for the Alvarado Creek to connect to the San Diego River. Provide a pedestrian connection with the bridge for access to the River and Creek (San Diego River Park Master Plan).
- Primary access for each ground-floor commercial, office, retail, and residential unit/space shall be provided directly from the public right-of-way, public street, and/or internal street (SDR 6). All sidewalks, crosswalks and access to the entrances shall be ADA compliant. A straight, accessible path of travel shall be maintained clear without any obstructions (SDR 19).

The pedestrian improvements within the study area are consistent with the goals included in the City of San Diego Pedestrian Master Plan.

T-24 Bicycle Circulation Improvements:

- Per the City of San Diego River Park Master Plan, provide the following:
  - Provide for a San Diego River Pathway connection to San Diego Mission Road from the north side of the river at Rancho Mission Road.
  - Provide a bridge at Mission Gorge/Fairmount Ave for the Alvarado Creek to connect to the San Diego River. Provide a bicycle connection with the bridge for access to the River and Creek (San Diego River Park Master Plan). Enhanced bike lanes and crossings shall be provided between the proposed San Diego River bike path and the existing Fairmount Avenue bike path.
  - Identify land for bicycle (and pedestrian) trail through land acquisition or open space easements and identify an alignment for the San Diego River Pathway as Grantville redevelops.
  - Development shall provide a minimum of one bicycle connection (and pedestrian) to each adjacent property. These bicycle connections shall be coordinated and connected. Fencing or walls that limit access are prohibited. (SDR 21)
  - Project shall be provided per City standard. Bike racks must be provided along the project's street frontage. (SDR 22)
- Per SANDAG's San Diego Regional Bicycle Plan, provide a Class I Bike Path along the San Diego River Bikeway Corridor.
- Per the Navajo PFFP, provide the following:
  - Complete the Mission Trails Bike Path Study (#T13)
  - Construct bicycle routes throughout the community (#T14)
- Per the City of San Diego Bicycle Master Plan, provide the following:
  - Class II Bike Lane along Friars Road from I-15 SB Ramps to Mission Gorge Road
  - Class II Bike Lane along Mission Gorge Road from Jackson Drive to Friars Road
  - Class II Bike Lane along Mission Gorge Road from Friars Road to I-8/Fairmount Avenue interchange
  - ~~Class III Bike Route~~ Class II Bike Lane along Zion Avenue from Mission Gorge Road to Waring Avenue
  - Class II Bike Lane along San Diego Mission Road from Rancho Mission Road to Twain Avenue
  - Class II Bike Lane along Camino Del Rio North from east of Ward Street to Fairmount Avenue

- Class II Bike Lae along Mission Gorge Place from Alvarado Canyon Road to Fairmount Avenue

Furthermore, the bicycle network improvements within the study area are identified in the City of San Diego Bicycle Master Plan, SANDAG's San Diego Regional Bicycle Plan, San Diego River Park Master Plan, Navajo Community Plan – Grantville CPIOZ Section, and the Navajo Facilities Financing Plan. These bicycle improvements shall be implemented through the fully funded PFFP and future development projects.

T-25 Transit Improvements

- ~~All streets, which are directly served by transit should be designed or retrofitted to serve pedestrians since there must be adequate facilities to access transit. Provide sufficient ADA compliant pedestrian access to all mass transit facilities.~~
- ~~Bus Shelters should be provided at all bus stop locations in the FPA area.~~
- ~~Transit Priority Signals should be installed on all Mission Gorge Road Signals (from Friars Road to Camino del Rio North).~~
- ~~Based on the future ridership, increasing the bus frequency during peak periods should be considered. Bus stops should be considered within ¼ mile radius for every land use in the FPA area and bus routes should be reevaluated based on the proposed land uses.~~
- Per the Navajo Community Plan Amendment, provide the following:
  - All new projects shall provide wayfinding signage that identifies pedestrian and bicycle routes to and from the Grantville Trolley Station. (SDR 15)

T-26 Transportation Demand Management (TDM) Improvements

- Per Chapter 14 Article 2 Division 5 §142.0540 (c), provide the following:
  - The TDM Plan shall be designed to reduce peak period automobile use with such techniques as carpooling, vanpooling, transit, bicycling, walking, telecommuting, compressed work weeks, or flextime.
  - Transit pass or transit discounts shall be incorporated into TDM Plans and Programs.
  - Intelligent Transportation System components shall be incorporated when possible with SANDAG ITS Program.
  - Transit Service time (Priority signalizing) and transit only lanes shall be incorporated as part of traffic improvements.

5.2.3.4 Impacts After Mitigation

With the implementation of Mitigation Measures T-1 to T-7, T-11 to T-20, T-23 to 26 ~~T-1 through T-26~~ and the approval of the proposed amendment to the Navajo Community Plan, impacts would be reduced to a level less than significant.

5.2.4 Issue 3: Freeway Segments/Ramps

Issue 3: Would the proposed FPA result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?

5.2.4.1 Impact Analysis

A. Freeway Segment Operations

Freeway segments were analyzed under the Year 2030 with project conditions. As shown in Figures 5.2-13a and 5.2-13b, all of the freeway segments within the study area are calculated to operate at LOS E or F in the Year 2030 with project scenario, which is considered a cumulatively significant impact. As shown in Table 5.2-13b, the following freeway segments would have a significant cumulative impact:

- I-15 NB: Aero Drive to Friars Road
- I-15 SB: Aero Drive to Friars Road
- I-15NB: Friars Road to I-8
- I-15 SB: Friars Road to I-8
- I-8 EB: I-15 to Fairmount Avenue
- I-8 WB: I-15 to Fairmount Avenue
- I-8 EB: Fairmount Avenue to Waring Road
- I-8 WB: Fairmount Avenue to Waring Road

B. Ramp Meter Operations / Freeway Interchange Intersections

Ramp meter operations were analyzed under the Year 2030 with project scenario. The study area ramp meters are calculated to operate at an acceptable LOS (delay of 15 minutes or less), except at Friars Road to Northbound I-15 (AM and PM peak hours), as shown in Table 5.2-14 below. The proposed FPA's impact to this freeway ramp is considered a cumulatively significant impact. The following freeway interchange intersections would have a significant cumulative impact:

- Friars Road / I-15 SB Intersection
- Fairmont Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio North Intersection

5.2.5.2 Significance of Impact

The project impacts were based on the Year 2030 with project conditions compared to the existing conditions. Per the City's significance thresholds and the analysis methodology, eight freeway segments, one freeway ramp, and two freeway interchange intersections would result in significant cumulative impacts.

5.2.4.3 Mitigation Framework

The following mitigation measures are recommended for the impacted freeway segments, ramps, and interchange intersections. Feasibility of the measures described below is identified in the feasibility sketches

provided in Appendix B of this PEIR. Mitigation measures identified below should be constructed per the City of San Diego's public road standards and as depicted in the feasibility sketches.

Table 5.2-13a: ~~Year 2030 with~~ Existing Freeway Segment Operations

Freeway and Segment	Dir.	Number of Lanes[a]	Hourly Capacity	Existing	Existing AM Peak Hour Volume	Existing AM V/C	Existing AM LOS	Existing PM Peak Hour Volume	Existing PM V/C	Existing PM LOS
Interstate 15										
Aero Drive to Friars Road	NB	4M+ 1A	9,200	204,000	**9,984**	**1.085**	**F(0)**	6,682	0.726	C
	SB	4M+ 2A	10,400		5,601	0.539	B	9,174	0.882	D
Friars Road to I-8	NB	4M+ 2A	10,400	197,000	**9,641**	**0.927**	**E**	6,453	0.620	C
	SB	4M+2CD+1A	13,200		5,409	0.410	B	8,860	0.671	C
Interstate 8										
I-15 to Fairmount Avenue	EB	4M	8,000	207,000	5,843	0.730	C	**9,223**	**1.153**	**F(0)**
	WB	4M+2CD	12,000		10,117	0.843	D	6,578	0.548	B
Fairmount Avenue to Waring Road	EB	4M+1CD+1A	11,200	228,000	6,436	0.575	B	10,158	0.907	D
	WB	5M+ 1A	11,200		**11,144**	**0.995**	**E**	7,245	0.647	C

Source: LLG, 2014

Table 5.2-13b: Year 2030 + Project Freeway Segment Operations

Freeway and Segment	Dir.	Number of Lanes[a]	Hourly Capacity	Year 2030 + Project ADT[b]	Year 2030 + Project AM Peak Hour Volume	Year 2030 + Project AM V/C	Year 2030 + Project AM LOS	Year 2030 + Project PM Peak Hour Volume	Year 2030 + Project PM V/C	Year 2030 + Project PM LOS
Interstate 15										
Aero Drive to Friars Road	NB	4M+ 1A	9,200	313,000	**15,318**	**1.665**	**F(3)**	**10,252**	**1.114**	**F(0)**
	SB	4M+ 2A	10,400		8,594	0.826	D	**14,076**	**1.353**	**F(2)**
Friars Road to I-8	NB	4M+ 2A	10,400	316,000	**15,465**	**1.487**	**F(3)**	**10,350**	**0.995**	**E**
	SB	4M+2CD+1A	13,200		8,676	0.657	C	**14,211**	**1.077**	**F(0)**
Interstate 8										
I-15 to Fairmount Avenue	EB	4M	8,000	278,000	**7,847**	**0.981**	**E**	**12,386**	**1.548**	**F(3)**
	WB	4M+2CD	12,000		**13,588**	**1.132**	**F(0)**	8,834	0.736	C
Fairmount Avenue to Waring Road	EB	4M+1CD+1A	11,200	305,000	8,609	0.769	C	**13,589**	**1.213**	**F(0)**
	WB	5M+ 1A	11,200		**14,907**	**1.331**	**F(1)**	9,692	0.865	D

Source: LLG, 2014

Table 5.2-14
Year 2030 with Project Ramp Meter Operations

Location/Condition	Min/ Max Rate	Peak Hour Demand	Peak Hour Demand/Lane	Meter Flow Rate (Veh/hr/lane)	Excess Demand (Veh/hr/lane)	Delay (min)	Queue (ft)
I-15 / Friars Road Interchange							
Northbound Ramp (AM Peak Hour)							
Existing	Min	1237	578	516	62	7	145
	Max	1237	578	600	0	0	0
Year 2030 + Project	Min	1610	753	516	237	28	550
	Max	1610	753	600	153	15	305
Project Increase	Min	373	174	NA	174	20	406

Location/Condition	Min/ Max Rate	Peak Hour Demand	Peak Hour Demand/Lane	Meter Flow Rate (Veh/hr/lane)	Excess Demand (Veh/hr/lane)	Delay (min)	Queue (ft)
	Max	373	174	NA	153	15	305
I-15/I-8 Southbound Ramp (AM Peak Hour)							
Existing	Min	632	632	660	0	0	0
	Max	632	632	996	0	0	0
Year 2030 + Project	Min	790	790	660	130	12	236
	Max	790	790	996	0	0	0
Project Increase	Min	158	158	NA	130	12	236
	Max	158	158	NA	0	0	0
I-15 Southbound Ramp (AM Peak Hour)							
Existing	Min	260	260	660	0	0	0
	Max	260	260	996	0	0	0
Year 2030 + Project	Min	260	260	660	0	0	0
	Max	260	260	996	0	0	0
Project Increase	Min	0	0	NA	0	0	0
	Max	0	0	NA	0	0	0
Northbound Ramp (PM Peak Hour)							
Existing	Min	1347	630	386	244	38	758
	Max	1347	630	672	0	0	0
Year 2030 + Project	Min	1770	827	386	441	69	1372
	Max	1770	827	672	155	14	278
Project Increase	Min	423	198	NA	198	31	615
	Max	423	198	NA	155	14	278
I-15/I-8 Southbound Ramp (PM Peak Hour)							
Existing	Min	571	571	660	0	0	0
	Max	571	571	996	0	0	0
Year 2030 + Project	Min	710	710	660	50	5	91
	Max	710	710	996	0	0	0
Project Increase	Min	139	139	NA	50	5	91
	Max	139	139	NA	0	0	0
I-15 Southbound Ramp (AM Peak Hour)							
Existing	Min	369	369	660	0	0	0
	Max	369	369	996	0	0	0
Year 2030 + Project	Min	370	370	660	0	0	0
	Max	370	370	996	0	0	0
Project Increase	Min	1	1	NA	0	0	0
	Max	1	1	NA	0	0	0

Table 5.2-14 (cont'd)
Year 2030 with Project Ramp Meter Operations

Location/Condition	Min/ Max Rate	Peak Hour Demand	Peak Hour Demand/Lane	Meter Flow Rate (Veh/hr/lane)	Excess Demand (Veh/hr/lane)	Delay (min)	Queue (ft)
I-8 / Fairmount Avenue Interchange							
Eastbound Ramp (AM Peak Hour) - Fairmount Avenue SB							
Existing	Min	232	232	516	0	0	0
	Max	232	232	600	0	0	0
Year 2030 + Project	Min	280	280	516	0	0	0
	Max	280	280	600	0	0	0
Project Increase	Min	48	48	NA	0	0	0
	Max	48	48	NA	0	0	0
Eastbound Ramp (PM Peak Hour) - Fairmount Avenue SB							
Existing	Min	510	510	660	0	0	0
	Max	510	510	996	0	0	0
Year 2030 + Project	Min	713	713	660	53	5	96
	Max	713	713	996	0	0	0
Project Increase	Min	203	203	NA	53	5	96
	Max	203	203	NA	0	0	0

Footnotes:
a. Meter Rates obtained from CALTRANS (*Appendix E*).
b. Delay expressed in minutes.
c. Queue
Source: LLG, 2014

Mainline Freeways Segment Mitigation Measures:

T-27 thru T-30

I-15 NB & SB: Aero Drive to I-8: San Diego Association of Governments (SANDAG) 2054~~0~~ Revenue Constrained Regional Transportation Plan (RTP) proposes the construction of 2 managed lanes along I-15 between I-8 and SR-163. Project is expected to be built by Year 2020. This measure provides partial mitigation since it reduces the traffic demand on the freeway general purpose lane; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.

T-31 thru T-34

I-8 EB & WB: I-15 to Waring Road: SANDAG 2052~~2~~0 Revenue Constraint RTP includes operational improvements along I-8 between I-15 and SR-125. Project is expected to be built by Year 2040. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.

Freeway Interchange Mitigation Measures:

I-15/Friars Road Interchange

T-35 Friars Road to Northbound I-15 Ramp: No mitigation measures have been identified for this location. Mitigation measures that would potentially reduce vehicular queuing and freeway ramp metering impacts at this location consists of adding freeway lanes, auxiliary lanes, adding a lane to the freeway on-ramp, implementation of TDM measures that encourage carpooling and other alternate means of transportation or a combination of these measures. Additional roadway improvements would also be necessary along Friars Road; however, this interchange is located within the Mission Valley Community Plan, and will be evaluated in more detail in the upcoming Mission Valley Community Plan Update. As a result, the FPA significant traffic impact to this intersection would remain significant and unmitigated.

T-36 Friars Road / I-15 SB Off-Ramps Intersection: Caltrans is in the process of developing preliminary improvement plans for this location which will be shared with City staff once available~~No mitigation measures have been identified for this location~~. ~~Additional through lanes along Friars Road would be needed to improve the traffic operations at this intersection to pre-project conditions or better which would require bridge widening. The existing bridge at this interchange is currently built to its ultimate classification per Mission Valley Community Plan.~~ It should be noted that this location is located within the Mission Valley Community Planning area where it will be evaluated in more detail in the upcoming Mission Valley Community Plan update. As a result, the FPA significant traffic impact to this intersection would remain significant and unmitigated.

I-8/Fairmount Avenue Interchange

T-37 Fairmount Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio N. Intersection: I-8/Fairmount Avenue interchange improvement project is included in the Navajo PFFP (# T12). This measure provides partial mitigation since it improves freeway and local roadway operation in the vicinity of the project; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.

5.2.4.4 Impacts After Mitigation

With implementation of the roadway improvements described above in Section 5.2.4.3, the proposed FPA would result in significant impacts to the freeway segments and ramps within the project study area in the Year 2013 with Project scenario. Impacts would be significant and unavoidable.

2.5 Issue 4: Traffic Hazards

Issue 4: Would the proposed FPA increase traffic hazards for motor vehicles, bicyclists or pedestrians?

5.2.5.1 Impact Analysis

The project would be designed to be consistent with the City's roadway standards and would not create a hazard for vehicles, bicycles, or pedestrians in the project area. The proposed FPA does not anticipate any significant impacts resulting in this issue area. Therefore, impacts would be less than significant.

5.2.5.2 Significance of Impact

Since the proposed FPA is designed consistently with the City's roadway standards, the proposed FPA would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. Since no hazards are expected, a less than significant impact has been identified for this issue area.

5.2.5.3 Mitigation Framework

A less than significant impact has been identified for the project area; therefore, no mitigation measures are recommended at this time.

5.2.5.4 Impacts After Mitigation

Since no hazards are expected, a less than significant impact has been identified for this issue area.

5.2.6 Issue 5: Alternative Transportation Modes

Issue 5: Does the proposed project conflict with adopted policies, plans or programs supporting alternative transportation models (e.g. bus turnouts, bicycle racks)?

5.2.6.1 Impact Analysis

The proposed FPA supports TOD that conforms with local policies, plans, and programs (*Navajo Community Plan*, *City of San Diego General Plan*, and the *2050 Regional Transportation Plan [RTP]*)and encourages the use of alternative transportation. MTS bus stops are located throughout the project area and the Grantville Trolley Station is in a centralized location within the proposed FPA area. Additionally, the proposed FPA requires a series of circulation improvements throughout the area, which would support the *Navajo Community Plan Circulation Element*. As indicated in the Navajo Community Plan – Grantville CPIOZ Section, the proposed FPA would ~~enforce~~ implement Mitigation Measures T-23 to T-25 as it relates to pedestrian and bicycle connectivity. T-26 addresses Transportation Demand Management (TDM) strategies and TDM programs that are consistent with the City's General Plan and comply with Chapter 14 Article 2 Division 5 §142.0540 (c). and support the use of these alternative modes of transportation. ~~In addition,~~ Mitigation Measure T-23 through T-26 shall be implemented to promote multi modal connections and pedestrian, bicycle, and transit improvements within the community. ~~As such, no impact is identified for this issue area.~~Therefore, no impacts are anticipated.

5.2.6.2 Significance of Impact

The proposed FPA would support the adopted local policies, plans and programs; therefore, no impact has been identified for this issue area.

5.2.6.3 Mitigation Framework

No impact has been identified as a result of the of the proposed FPA, and no mitigation is required.

5.2.6.4 Impacts After Mitigation

The proposed FPA would pose no impact with the adopted local plans and programs supporting alternative transportation models.

5.2.7 Conclusion

The proposed FPA would result in cumulatively significant impacts at nine intersections, fifteen street segments, eight freeway segments, and one freeway ramp. However, with implementation of the Mitigation Measures T-1 through T-7, T-11 through T-20 and T-23 through T-37, several of the cumulative impacts resulting from the proposed FPA would be reduced to a level less than significant, and in many cases, improve upon the existing traffic situation. However, some mitigation measures are not feasible; therefore, traffic impacts to intersections and roadway segments in the Year 2030 scenario with the implementation of the proposed FPA would be considered cumulatively significant and unmitigable. Mitigation Measures T-23 through T-26, which require pedestrian, bicycle, and transit improvements, as well as a preparation of a TDM program to ensure compliance with the Navajo Community Plan Circulation Element, would reduces impacts from project trip generation to a less than significant level. Since no hazards are expected, a less than significant impact has been identified for ~~In addition, the proposed FPA would not increase~~ traffic hazards to motor vehicles, bicyclists, or pedestrians.

5.3 Air Quality and Odor

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with air quality emissions. Information contained in this section is summarized from the ***Air Quality and Greenhouse Gas Study*** for the proposed FPA, prepared by Rincon Consultants, Inc. (Rincon), dated May 2014 (Appendix C of this PEIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix C, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix C, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.3.1 Existing Conditions

5.3.1.1 Climate

The proposed FPA area is located within the San Diego Air Pollution Control District (SDAPCD) of the San Diego Air Basin (SDAB), which includes 11 monitoring stations throughout the District. The distinctive climate of the SDAB is determined by its terrain and geographical location. The basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the western quadrant with mountains and canyon forming the eastern boundary. The climate of the SDAPCD is strongly influenced by its proximity to the Pacific Ocean and the location of the semi-permanent high-pressure cells in the northeastern Pacific. With a Mediterranean-type climate, the proposed FPA area is characterized by warm, dry summers and cool winters with occasional rainy periods.

Due to the large size and topography within the SDAPCD there is a wide variation in temperature within short distances. The moderating effect of the ocean regulates the coastal temperature to ranges of 58°F to 71°F near the coast. Daytime temperatures in nearby valleys are much warmer in summer and nights are noticeably cooler in the winter.

The dominant daily wind pattern for the basin is westerly daytime sea breeze and an easterly nighttime land breeze. Generally, wind speed averages are about 25% higher in spring and summer than in fall and winter, with an average wind speed of about 7.0 miles per hours at the coast and slightly lower in the inland mountains. This regime is broken by occasional winter storms and infrequent strong, northeasterly "Santa Ana" winds from the mountains and deserts northeast of the basin. "Santa Ana" winds are typically hot, dry northerly winds which blow offshore at 15-20 mph, but can reach speeds over 60 mph.

Two types of temperature inversions (warmer air on top of cooler air) are created in the area: subsidence and radiational. The subsidence inversion is a regional effect created by the Pacific high in which air is heated as it is compressed when it flows from the high-pressure area to the low-pressure areas inland. This type of inversion generally forms at about 1,000 to 2,000 feet and can occur throughout the year, but it is most evident during the summer months. Surface inversions are formed by the more rapid cooling of air

near the ground during the night, especially during winter. This type of inversion is typically lower and is generally accompanied by stable air. Both types of inversions limit the dispersal of air pollutants within the regional air shed, with the more stable air (low wind speeds, uniform temperatures), the lower the amount of pollutant dispersion.

5.3.1.2 Air Pollution Regulation

Through the Federal and State Clean Air Acts, the federal and state governments regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (USEPA) is the federal agency designated to administer air quality regulation, while the Air Resources Board (ARB) is the state equivalent in the California Environmental Protection Agency. Local control in air quality management is provided by the ARB through multi-county and county-level Air Pollution Control Districts (APCDs). The ARB establishes statewide air quality standards and is responsible for the control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 15 air basins statewide. As described above, the City of San Diego is located in the SDAB, which is under the jurisdiction of the SDAPCD.

Federal and state standards have been established for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb) (refer to Table 5.3-1). The local air quality management agency is required to monitor air pollutant levels to assure that air quality standards are met and, in the event they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as in "attainment" or "nonattainment."

Table 5.3-1:
Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standards
Ozone	1-Hour	---	0.09 ppm
	8-Hour	0.075 ppm	0.070 ppm
PM_{10}	24-Hour	150 µg/m^3	50 µg/m^3
	Annual	---	20 µg/m^3
$PM_{2.5}$	24-Hour	35 µg/m^3	---
	Annual	12 µg/m^3	12 µg/m^3
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	24-Hour	---	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
Lead	30-Day Average	---	1.5 µg/m^3
	3-Month Average	0.15 µg/m^3	---

Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter
Source: Rincon, 2014.

Ozone

Ozone (O_3) is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic gases (ROG). Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless, poisonous gas found in high concentrations only near the source (typically automobile traffic). Thus, elevated concentrations are usually only found near areas of high traffic volumes, particularly at congested intersections when automobiles are idling or in stop-and-go traffic. These localized high concentrations of CO are referred to as "CO hot spots". The health effects of CO are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduces lung capacity and impairs mental abilities.

Nitrogen Dioxide

Nitrogen dioxide (NO_2) is an acute irritant and is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 ppm may occur. NO_2 absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulates

PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

5.3.1.3 Regional Conditions

San Diego County is listed as a federal non-attainment area for ozone (8-hour standard), and a state non-attainment area for ozone (1-hour and 8-hour standards), PM_{10}, and $PM_{2.5}$. As shown in Table 5.3-2, the SDAB is in attainment for the state and federal standards for NO_2, CO, SO_2, and Pb. \Non-attainment

status for the SDAPCD is a result of several factors, primarily the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants (surface and subsidence inversions); the limited capacity of the local airshed to eliminate pollutants from the air; and, the number, type, and density of emission sources within the San Diego Air Basin.

Table 5.3-2: San Diego County Air Pollutant Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-Hour)	Attainment*	Non-Attainment
Ozone (8-Hour)	Non-Attainment	Non-Attainment
Carbon Monoxide	Attainment	Attainment
PM_{10}	Unclassified**	Non-Attainment
$PM_{2.5}$	Attainment	Non-Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(no federal standard)	Attainment
Hydrogen Sulfide	(no federal standard)	Unclassified
Visibility	(no federal standard)	Unclassified

Notes: *The federal one hour standard of 12 ppm was in effect from 1979 through June 1, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in the SIPs.
**At the time of designation, if the available data does not support a designation of attainment or non-attainment, the area is designated as unclassifiable.
Source: Rincon, 2014.

5.3.1.4 Local Ambient Air Quality

The SDAPCD monitors air quality conditions at locations throughout the SDAB. The closest monitoring station to the proposed FPA area is the Kearny Villa Road monitoring station. As such, for the purpose of this analysis, data from the Kearny Villa Road monitoring station were used to characterize existing ozone conditions in the vicinity of the proposed FPA area, and to establish a baseline for estimating future conditions both with and without the proposed FPA. With the exception of PM_{10} data for 2012, all PM data (PM_{10} and $PM_{2.5}$) is reported from the El Cajon Redwood Street monitoring station, because the Kearny Villa Road station does not measure PM data. A summary of the data recorded at both the Kearney Villa Road and El Cajon Redwood Street monitoring stations from 2010 through 2012 is presented in Table 5.3-3 below.

Table 5.3-3: Ambient Air Quality Data

Pollutant	2010	2011	2012
Ozone, ppm – Worst Hour	0.073	0.093	0.099
Number of days of State 1-hour exceedances (>0.09 ppm)*	0	2	3
Number of days of Federal exceedances (>0.075 ppm)*	0	1	1
Particulate Matter < 10 microns, $\mu g/m^3$ Worst 24 Hours	36	37	35
Number of samples of State exceedances (>50 $\mu g/m^3$)	0	0	0
Number of samples of Federal exceedances (>150 $\mu g/m^3$)	0	0	0
Particulate Matter <2.5 microns, $\mu g/m^3$ Worst 24 Hours	27.7	29.7	37.7
Number of samples of State exceedances (>50 $\mu g/m^3$)	N/A	N/A	N/A
Number of samples of Federal exceedances (>150 $\mu g/m^3$)	0	0	1

Notes: Ozone and PM10 data for 2010 and 2011 from Kearney Villa Road monitoring station; PM10 data for 2010/2011 and PM2.5 data from El Cajon Redwood Street monitoring station. Source: Rincon 2014.

As shown in Table 5.3-3 above, both the federal and state ozone standards were exceeded at the Kearny Villa Road station during 2011 and 2012. The $PM_{2.5}$ concentration exceeded the state standards on one occasion in January 2012.

5.3.1.5 Air Quality Management Plan/Regional Air Quality Strategy

The Federal Clean Air Act Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures to demonstrate how the standards will be met through those measures. The SIP is established by incorporating measures established during the preparation of Air Quality Management Plans (AQMPs) and adopted rules and regulations by each local APCD and AQMD, which are submitted for approval to the California Air Resources Board (CARB) and the federal Environmental Protection Agency (USEPA). The goal of an AQMP is to reduce pollutant concentrations below the National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.

The San Diego Regional Air Quality Strategy (RAQS) was developed pursuant to CAAA requirements. The RAQS was initially adopted in 1991 and was updated in 1995, 1998, 2001, 2004, and most recently in 2009 (SDAPCD, 2009). The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are volatile organic compounds/reactive organic gases (VOC/ROG) and nitrogen oxides (NO_x), precursors to the photochemical formation of ozone (the primary component of smog). The RAQS was initially adopted by the San Diego County Air Pollution Control Board on June 30, 1992, and amended on March 2, 1993, in response to ARB comments (2009 Revision of the Regional Air Quality Strategy, 2009). At present, no attainment plan for PM_{10} or $PM_{2.5}$ is required by the state regulations. However, SDAPCD has adopted measures to reduce particulate matter in San Diego County. These measures range from regulation against open burning to incentive programs that introduce cleaner technology.

The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and the county as part of the development of the individual general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the RAQS. In the event that a project would propose development that is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections, the project might be in conflict with the RAQS and SIP, and might have a potentially significant impact on air quality.

The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the SDAPCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the NAAQS for ozone.

5.3.1.6 Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children; the elderly; persons engaged in strenuous work or exercise; and, people with cardiovascular and chronic respiratory diseases. The proposed FPA area is currently primarily comprised of commercial and industrial uses. Multi-family uses are located northeast of Waring Road and Interstate 8 and south of Adobe Falls Road. A small area located northwest of the Mission Gorge Road/Vendever Avenue intersection is designated for multi-family use. Kaiser Hospital is located in the northwest corner of the proposed FPA area. Single-family residences are located east/northeast of the proposed FPA area boundary; however, none are located within proposed FPA area.

5.3.2 Significance Determination Thresholds

According to the CEQA Guidelines, Appendix G, a significant impact to air quality and odor would occur if the proposed FPA would:

- *Conflict with or obstruct implementation of the applicable air quality plan;*
- *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*
- *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);*
- *Expose sensitive receptors to substantial pollutant concentrations; or*
- *Create objectionable odors affecting a substantial number of people;*

Air quality modeling was performed in general accordance with the methodologies outlined in the SDAPCD 2009 Regional Air Quality Strategy (RAQS). Maximum daily emissions were quantified using the CalEEMod Version 2013.2.2 emissions model.

Land use assumptions (8,275 dwelling units and 524,000 sf of commercial space) and total daily trips for the proposed FPA were based on the LLG traffic study (Appendix B of this PEIR), and were originally derived using the City of San Diego *Trip Generation Manual* (2003).

The SDAPCD has established screening level thresholds (screening criteria) for evaluating air quality emissions (Rule 20.1 et seq.). The City of San Diego utilizes the SDAPCD Pollutant Thresholds for Stationary Sources, shown in Table 5.3-4 below. These thresholds are based on Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources found in SDAPCD Rule 20.2 and ROG thresholds used by the South Coast Air Quality Management District (SCAQMD) and the Monterey Bay APCD (MBAPCD), which has similar federal and state attainment status as San Diego.

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

Table 5.3-4: SDAPCD Thresholds of Significance for Air Quality Impacts

	Thresholds Significance		
Pollutant	Pounds Per Hour	Pounds Per Day	Tons Per Year
Carbon Monoxide (CO)	100	**550**	100
Oxides of Sulfur (SO_x)	25	**250**	40
Volatile Organic Compounds (VOC's)(1)	---	**137**	15
Reactive Organic Gases (ROG's)	---	**137**	15
Oxides of Nitrogen (NO_x)	25	**250**	40
Particulate Matter (PM_{10})	---	**100**	15

Notes 1=VOC thresholds based upon SCAQMD levels per SDAPCE/DPLU requirements (9/01).
Source: SDAPCD Rule 1501, 20.2(d)(2).

5.3.3 Issue 1: Regional Air Quality Strategy Consistency

Issue 1: Would the proposed FPA result in a conflict with or obstruct implementation of the applicable air quality plan?

5.3.3.1 Impact Analysis

As discussed above, if a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections, the project could be in conflict with the RAQS and SIP, and could have a potentially significant impact on air quality. As further detailed in Appendix C of this PEIR, San Diego's current population is 1,326,238. The proposed FPA could facilitate up to 8,275 dwelling units generating an estimated 15,888 new residents (based on an average household size of 1.92 persons). This would increase the City's population by 1.2% to 1,342,126 (see Table 5.3-5). By comparison, the population forecasts in the City's General Plan, upon which the RAQS is based, estimate the City's 2020 population at 1,514,336 (an increase of 188,098 people from the current population) and the 2030 population at 1,656,257 (an increase of 330,019 from the current population). Table 5.3-6 provides comparison of the population with the proposed FPA. Therefore, the additional 15,888 residents that could be added by the proposed FPA would be within RAQS population forecasts and would not conflict with the RAQS and SIP. Accordingly, because the proposed FPA would not conflict with or obstruct implementation of the applicable air quality plan, it is anticipated that impacts would be less than significant.

Table 5.3-5: Population Growth with the Proposed FPA

	Population
City of San Diego	1,326,238
Proposed FPA Buildout	15,888*
Total City of San Diego Population with proposed FPA	1,342,126
Percent Increase from the Proposed FPA	1.2%

Notes: *Based on an average household size of 1.92 persons.
Source: Rincon Consultants, Inc., 2014.

Table 5.3-6: Population Growth with Proposed FPA Compared to Forecasted Population Growth

	2020	2030
Population Forecast	1,514,336	1,656,257
Increase Compared to Current Population	188,098	330,019
Percent Increase Compared to Current Population	14.2%	24.9%
Proposed Population Associated with Proposed FPA Development	15,888	15,888
Percent of Citywide Forecasted Growth Accounted for by the Proposed FPA	8.4%	4.8%

Source: Rincon Consultants, Inc., 2014.

5.3.3.2 Significance of Impact

The proposed FPA could facilitate up to 8,275 dwelling units generating an estimated 15,888 new residents. However, the potential population increase associated with the proposed FPA would be within RAQS population forecasts and would not conflict with the RAQS and SIP. As such, the proposed FPA would not conflict with or obstruct implementation of the applicable air quality plan and it is anticipated that impacts would be less than significant.

5.3.3.3 Mitigation Framework

Implementation of the proposed FPA would not conflict with or obstruct implementation of the applicable air quality plan; therefore, no mitigation measures are required.

5.3.3.4 Significance After Mitigation

No mitigation would be required; therefore, there would be no impacts after mitigation.

5.3.4 Issue 2: Air Quality Standards

Issue 2: Would the proposed FPA result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

5.3.4.1 Impact Analysis

A. Construction Emissions

Construction of future development projects allowed under the proposed FPA would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles, in addition to ROG that would be released during the drying phase of architectural coatings.

Construction emissions modeling includes air emissions associated with demolition, site preparation, grading, building construction, paving, and application of architectural coatings. The City of San Diego Municipal Code Section (SDMC) 142.0710 requires that during construction, "air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause

soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located."

CalEEMod assumes that watering would occur at least twice daily during construction to reduce particulate matter emissions in compliance with SDMC Section 142.0710. This analysis also assumes that graded soils would be balanced and that no soil import or export would be required. In addition, it was assumed that architectural coatings would comply with SDAPCD Rule 67.0- Architectural Coatings.

Due to the programmatic nature of the proposed FPA, the exact number and timing of all development projects that could occur under the proposed FPA are unknown. However, since the area is heavily developed, it can be assumed future projects would involve the demolition of existing structures and improvements.

If the proposed FPA is approved, approximately 8,275 new residences would be allowed within the proposed FPA area in areas that are currently developed with non-residential uses. Construction could occur along the primary road corridors and in their immediate vicinity; thus, traffic would continue to be the primary source of air emissions within the area.

All future development projects allowed under the proposed FPA would have to comply with local, state and federal air quality regulations. In compliance with SDMC Section 142.0710, particulate matter emissions may be reduced utilizing the following construction BMPs:

- **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
- **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.
- **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
- **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).

- **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

The proposed FPA would also allow for transit-oriented and mixed-use development in an area characterized by industrial and commercial uses. As such, the proposed FPA would increase density and would accommodate construction activity near sensitive receptors. Per the Mitigation Framework for Air Quality Impacts, future development projects within the proposed FPA area would be required to demonstrate compliance with SDAPCD regulations and associated BMPs related to potential construction emissions. In addition, compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors. Adherence to the Mitigation Framework as detailed in Mitigation Measure AQ-1 and City of San Diego rules would reduce potential construction-related air pollution impacts from individual development projects to a level less than significant.

Operational Emissions

Operational emissions associated with future development allowed under the proposed FPA would include those associated with mobile (vehicle trip), area (landscaping and architectural coating emissions as the structures are repainted over the life of the project) and energy sources (electricity and natural gas consumption). Due to the programmatic nature of the proposed FPA, the estimated operational emissions from future development projects are provided for informational purposes only. The estimated operational emissions are shown in Table 5.3-7 below.

Table 5.3-7: Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Existing Development to be Removed						
Area	35.5	<0.01	0.1	<0.01	<0.01	<0.01
Energy	0.7	6.5	5.4	0.04	0.5	0.5
Mobile	96.3	207.0	953.7	1.7	117.1	33.2
Subtotal	132.5	213.5	959.3	1.7	117.5	33.7
Proposed FPA Buildout						
Area	228.6	7.8	600	0.03	3.8	3.8
Energy	1.4	12.4	6.5	0.08	1.0	1.0
Mobile	121.7	183.8	1,071.9	4.3	289.3	80.3
Subtotal	351.7	204.0	1,758.8	4.4	294.0	85.0
Net new emissions (proposed minus existing)	**219.2**	**(9.5)**	**799.5**	**2.7**	**176.5**	**51.3**

Notes: Assumes removal of existing commercial and industrial space and construction of 8,275 dwelling units and 524,000 sf of commercial space. All calculations were made with CalEEMod ver. 2013.2.2. Trip generation information from the traffic study (LLG, 2014). Assumes compliance with SDAPCD Rule 67.0 – Architectural Coatings. Summer emissions shown. Numbers may not add up due to rounding. ( ) = negative number.
Source: Rincon Consultants, Inc., 2014.

As the proposed FPA is programmatic in nature, the project-level thresholds described in Table 5.3-4 do not apply to the estimated operational emissions shown in Table 5.3-7 above. Implementation of the proposed FPA would not permit the construction of any individual project, and no specific development details are

available at this time. The information in Table 5.3-7 is presented to illustrate the potential scope of daily operational air quality impacts for future development projects that could occur under the proposed FPA. The thresholds presented in Table 5.3-4 are applied on a project-specific basis and are not used for assessment of regional planning impacts. Therefore, the significance determination for this analysis is based on the consistency of the proposed FPA with the applicable air quality plans.

Local Carbon Monoxide Emissions

As previously discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of state and federal CO standards. At the El Cajon-Redwood monitoring station, the station closest to the proposed FPA area that measures CO, the maximum 8-hour CO level recorded in 2012 was 1.86 parts per million (ppm) and, in 2011, was 1.46 ppm, approximately one-fifth of the 9 ppm state and federal 8-hour standard.

Although CO is not expected to be a major air quality concern in San Diego, elevated CO levels can occur at or near intersections that experience severe traffic congestion. A project's localized air quality impact is considered significant if the additional CO emissions resulting from the project create a "hot spot" where the California 1-hour standards of 20.0 ppm or the 8-hour standard of 9 ppm is exceeded. This typically occurs at severely congested intersections. Screening for possible elevated CO levels should be conducted for severely congested intersections experiencing levels of service E or F with project traffic where a significant project traffic impact may occur. The City of San Diego recommends a quantified assessment of CO hot spots if a development:

1. Causes a six-lane road to deteriorate to LOS E or worse;
2. Causes a six-lane road to drop to LOS F;
3. Causes a four-lane road to drop to LOS E or worse; or
4. If a proposed development is within 400 feet of a sensitive receptor and the LOS is worse than D.

According to the traffic study prepared by LLG (Appendix B of this PEIR), eight intersections meet at least one of these criteria:

1. Friars Road/I-15 SB Ramps (AM and PM)
2. Friars Road/Riverdale Street (AM and PM)
3. Mission George Road/Zion Avenue (AM and PM)
4. Mission George Road/Princess View Drive (AM)
5. Waring Road/Princess View Drive (AM)
6. Waring Road/Zion Avenue (AM and PM)
7. Fairmount Avenue/Mission Gorge Place (AM)
8. Fairmount Avenue/Alvarado Canyon Road/Camino Del Rio N (AM and PM)

The results of the CO hot spot model for the proposed FPA are shown in Table 5.3-8 below. As shown, CO levels at these intersections would not exceed federal or state ambient air quality standards for CO. Therefore, it is anticipated that impacts would be less than significant.

5.3.4.2 Significance of Impact

While it is possible, it is not anticipated that construction emissions from individual future development projects facilitated by implementation of the proposed FPA would result in exceedance of SDAPCD thresholds. Based on the estimated operational emissions at buildout of the proposed FPA, daily emissions of ROGs, CO, and PM_{10} would exceed SDAPCD thresholds. However, as previously mentioned, the project-level thresholds described in Table 5.3-4 do not apply to the estimated operational emissions in Table 5.3-8, and the estimated emissions are provided for informational purposes only. Per the Mitigation Framework for Air Quality Impacts, future development projects within the proposed FPA area would be required to demonstrate compliance with SDAPCD regulations and associated BMPs related to potential construction emissions. In addition, compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors.

Table 5.3-8
Intersection Carbon Monoxide (CO) Concentrations

Intersection	Peak Hour	Peak Hour CO Levels with Proposed FPA	Ambient Air Quality Standards (Federal/State)	Exceeds Federal or State AAQS
1. Friars Road/I-15 SB Ramps	AM	4.6	35.0 ppm/20.0 ppm	No
2. Friars Road/Riverdale Street	AM	4.7	35.0 ppm/20.0 ppm	No
	PM	5.4		
3. Mission Gorge Road/Zion Avenue	AM	4.4	35.0 ppm/20.0 ppm	No
	PM	5.1		
4. Mission Gorge Road/Princess View Drive	AM	3.6	35.0 ppm/20.0 ppm	No
5. Waring Road/Princess View Drive	AM	3.9	35.0 ppm/20.0 ppm	No
6. Waring Road/Zion Avenue	AM	4.0	35.0 ppm/20.0 ppm	No
	PM	4.1		
7. Fairmount Avenue/Mission Gorge Place	AM	4.6	35.0 ppm/20.0 ppm	No
8. Fairmount Avenue/Alvarado Canyon Road/Camino Del Rio N	AM	4.4	35.0 ppm/20.0 ppm	No
	PM	5.2		

Source: Rincon Consultants, Inc., 2014.

5.3.4.3 Mitigation Framework

With adherence to the Mitigation Framework as detailed in Mitigation Measure AQ-1, the implementation of the FPA would not result in the exceedance of air quality standards.

AQ-1: For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce

construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:

- Minimizing simultaneous operation of multiple pieces of construction equipment;
- Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated
- equipment;
- Use of alternative fueled construction equipment;
- Dust control measures for construction sites to minimize fugitive dust, e.g. watering,
- soil stabilizers, and speed limits; and
- Minimizing idling time by construction vehicles.

5.3.4.4 Significance After Mitigation

With adherence to the Mitigation Framework as detailed in Mitigation Measure AQ-1, the implementation of the FPA would not result in the exceedance of air quality standards.

5.3.5 Issue 3: Cumulative Air Pollutant Emissions

Issue 3: Would the proposed FPA result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors)?

5.3.5.1 Impact Analysis

Short-Term Cumulative Impacts

Air Quality Standards and construction emissions associated with individual development projects within the proposed FPA are not anticipated to exceed SDAPCD thresholds. Approval of the proposed FPA would not permit the construction of any individual development project. Although it is unlikely that multiple individual development projects would be constructed simultaneously, if multiple projects were constructed simultaneously, there would be the potential that construction emissions would result in a cumulatively considerable increase in net new emissions of criteria pollutants, some of which the SDAB is currently in federal and/or state non-attainment. As such, the net new short-term construction emissions that may result if multiple individual development projects were constructed simultaneously would be considered significant. However, this scenario is not reasonably foreseeable ~~unlikely~~, and with future individual project implementation in compliance with the SDAPCD regulations, SDMC, and implementation of BMPs, short-term cumulative impacts would be reduced to a less than significant level.

Long-Term Cumulative Impacts

Long-term emissions associated with future development in the proposed FPA area would be those associated with mobile, area, and energy sources. Future development of the proposed FPA area would add 8,275 residential dwelling units and 388,300 square feet of commercial space. The long-term emissions take into account the removal of existing on-site industrial and commercial uses (1,143,500 square feet of

industrial space and 147,900 sf of commercial space). Table 5.3-8 above shows the estimated operational emissions at buildout of the proposed FPA.

As previously mentioned, the SDAB is currently in Federal non-attainment for ozone (1-hour) and State non-attainment for ozone (1- and 8-hour), PM_{10}, and $PM_{2.5}$. Ozone is not emitted directly but forms in the atmosphere by a photochemical reaction between nitrogen oxides and reactive organic gases. As such, it is difficult to quantify future ozone emissions. However, estimated emissions of ozone precursors such as nitrogen oxides and reactive organic gases can be used to indicate the potential for ozone formation in the atmosphere. According to the data presented in Table 5.3-8, implementation of the proposed FPA would result in total emissions of 351.7 pounds per day of ROGs at buildout, which is a net increase of 219.2 pounds per day when compared to the ROG emissions from existing land uses. The net new long-term ROG emissions that would result from implementation of the proposed FPA would be cumulatively considerable, and potential air quality impacts would be considered significant. In regards to NO_x, implementation of the proposed FPA would result in total emissions of 204.0 pounds per day of NO_x at buildout, which is a net decrease of 9.5 pounds per day when compared to the NO_x emissions from existing land uses.

In addition to ozone, the SDAB is in State non-attainment for PM_{10} and $PM_{2.5}$. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. Specifically, the small particulates (PM_{10}) generally come from windblown dust and dust kicked up from mobile sources. The fine particulates ($PM_{2.5}$) are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. As shown in Table 5.3-8 above, implementation of the proposed FPA would result in total emissions of 294.0 pounds per day of PM_{10} at buildout, which is a net increase of 176.5 pounds per day when compared to PM_{10} emissions from existing land uses. In regards to $PM_{2.5}$, implementation of the proposed FPA would result in total emissions of 85.0 pounds per day of $PM_{2.5}$, which is a net increase of 51.3 pounds per day when compared to $PM_{2.5}$ emissions from existing land uses. The net new long-term PM_{10} and $PM_{2.5}$ emissions that would result from implementation of the proposed FPA would be cumulatively considerable, and potential air quality impacts would be considered significant.

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

5.3.5.2 Significance of Impact

Short-term and long-term emissions associated with future development in the proposed FPA area have the potential to result in a cumulatively considerable net increase in criteria pollutants for which the SDAB is currently under federal and state non-attainment. There is the potential that a cumulatively considerable increase in temporary air pollutants associated with construction could result if multiple development

projects occurred simultaneously. However, with future project compliance with SDAPCD regulations and the SDMC, and with implementation of BMPs, short-term cumulative impacts would be reduced to a less than significant level.

Net new long-term daily operational emissions of ROGs (an ozone precursor), CO, PM_{10} and $PM_{2.5}$ would drastically increase as a result of implementation of the complete buildout of the proposed FPA. As such, implementation of the proposed FPA could result in increased area emissions, which could potentially affect San Diego's ability to meet regional, state, and federal ambient air quality standards. The increase in future long-term operational emissions of particulates and ozone precursors associated with the proposed FPA would result in a significant air quality impact. It is anticipated that mitigation measures incorporating air pollutant emission reduction BMPs would be implemented with any future development in the proposed FPA area on a project-specific basis. However, due to the programmatic nature of the proposed FPA, it is not presently possible to determine whether project-specific mitigation measures would reduce cumulatively considerable emissions to a less than significant level. Individual discretionary projects in the proposed FPA area would be subject to environmental review pursuant to CEQA, as well as evaluated for consistency with all applicable City of San Diego plans, policies, and guidelines. Mitigation Measure AQ-1, which would require the preparation of an Air Quality Study to be prepared and submitted to the City for review for each individual future project, would reduce air quality impacts from individual future developments within the proposed FPA. However, it is uncertain if impacts would be reduced to a level less than significant. As such, cumulative long-term air pollutant impacts resulting from future development within the proposed FPA would remain significant.

5.3.5.3 Mitigation Framework

The increase in future long-term operational emissions of particulates and ozone precursors associated with the proposed FPA would result in a significant air quality impact. The goals, policies, and recommendations of the City combined with the federal, state, and local regulations provide a framework for developing project-level air quality protection measures for future 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 and Community Plan, as amended by the FPA. In general, implementation of the policies in the Community Plan, as amended by the FPA, and General Plan would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

Mitigation Measure AQ-2 shall be implemented to reduce project-level impacts where mitigation is determined to be necessary and feasible, ~~The Community Plan identifies mitigation requirements for project level impacts. See the Navajo Community Plan – Grantville CPIOZ Section.~~ These measures shall be included in a Mitigation Monitoring and Reporting Program for the project.

AQ-2 Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with ~~all reasonable~~ feasible mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

5.3.5.4 Significance After Mitigation

While compliance with the SDAPCD regulations, the SDMC, the Mitigation Framework, and implementation of BMPs would reduce emissions, future projects may not be able to reduce air emissions below the City's threshold. Therefore, impacts would remain significant and unavoidable.

5.3.6 Issue 4: Sensitive Receptors

Issue 4: Would the proposed FPA expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates?

5.3.6.1 Impact Analysis

As previously mentioned, the size, type, and location of future development projects and potential sensitive receptors are not known at this time due to the programmatic nature of the proposed FPA. This information would be necessary to quantify emission levels of criteria pollutants and air toxics, including diesel particulates, and determine the significance of impacts associated with future individual development projects within the proposed FPA area. The proposed FPA would allow for transit-oriented and mixed-use development in an area currently characterized by industrial and commercial uses. As a result, the proposed FPA would increase density and construction activity that may be located near sensitive receptors. However, compliance with SDMC Section 142.0710 which states, "air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located," would reduce the potential for pollutants to affect nearby sensitive receptors. Therefore, it is anticipated that impacts to sensitive receptors would be less than significant.

5.3.6.2 Significance of Impact

There is the potential for future development projects allowed under the proposed FPA to expose sensitive receptors to substantial pollutant concentrations, including air toxics such as diesel particulates. However, compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors. Therefore, it is anticipated that impacts to sensitive receptors would be less than significant.

5.3.6.3 Mitigation Framework

Construction of any future development projects allowed under the proposed FPA would be required to comply with SDMC Section 142.0710; therefore, no mitigation measures are required.

5.3.6.4 Significance After Mitigation

No mitigation is required; therefore, there would be no impacts after mitigation.

5.3.7 Issue 5: Particulate Matter

Issue 5: Would the proposed FPA exceed 100 pounds per day of Particulate Matter (dust)?

5.3.7.1 Impact Analysis

A. Construction Emissions

As shown in Table 5.3-7 above, emissions of PM_{10} and $PM_{2.5}$ from construction of future individual development projects allowed under the proposed FPA would not exceed 100 pounds per day. Although it is unlikely, if multiple individual development projects were constructed simultaneously, there would be the potential that construction emissions would result in a cumulatively considerable increase in net new emissions of particulate matter. However, this scenario is unlikely, and with future individual project implementation in compliance with the SDAPCD regulations, the SDMC, and with the implementation of the construction related BMPs described under Issue 2: Air Quality, construction emissions of particulate matter would be reduced to a less than significant level.

B. Operational Emissions

As shown in Table 5.3-8 above, daily operational emissions of PM_{10} at buildout of the proposed FPA are estimated at 294.0 pounds per day, which would exceed the SDAPCD threshold by 194.0 pounds per day. However, as previously mentioned, the project-level thresholds described in Table 5.3-4 do not apply to the estimated daily operational emissions that would result from implementation of the proposed FPA. The thresholds presented in Table 5.3-4 would be applied on a project-specific basis and are not used for assessment of regional planning impacts. Nonetheless, these potential operational impacts would be considered significant. Implementation of the Mitigation Framework as detailed in Mitigation Measure AQ-1 would reduce particulate matter emissions; however, impacts resulting from particulate matter would remain significant and unavoidable as future projects may not be able to reduce operational emissions of PM_{10} to a level less than significant. Should operational particulate matter emissions from future development not be reduced below a level of significance, additional mitigation measures may be required on a project-specific basis.

5.3.7.2 Significance of Impact

It is not anticipated that the construction of any future individual development projects allowed under the proposed FPA would result in emissions of particulate matter in exceedance of 100 pounds per day. Although it is unlikely, if multiple individual projects were to be under construction simultaneously, there would be a potential that a cumulatively considerable increase in emissions of particulate matter may result in exceedance of 100 pounds per day. However, this scenario is unlikely and with future individual project implementation in compliance with the SDAPCD regulations, the SDMC, and with the implementation of the construction related BMPs described under Issue 2: Air Quality, construction emissions of particulate matter would be reduced to a less than significant level.

In addition, daily operational emissions of PM_{10} would drastically increase as a result of implementation of the proposed FPA. Implementation of the Mitigation Framework as detailed in Mitigation Measure AQ-1 would reduce particulate matter emissions; however, impacts resulting from particulate matter would

remain significant and unavoidable as future projects may not be able to reduce operational emissions of PM_{10} to a level less than significant. Should operational particulate matter emissions from future development not be reduced below a level of significance, additional mitigation measures may be required on a project-specific basis.

5.3.7.3 Mitigation Framework

Daily operational emissions of PM_{10} would drastically increase as a result of implementation of the proposed FPA. Implementation of the Mitigation Framework as detailed in Mitigation Measure AQ-1 would reduce particulate matter emissions; however, impacts resulting from particulate matter would remain significant and unavoidable as future projects may not be able to reduce operational emissions of PM_{10} to a level less than significant. Should operational particulate matter emissions from future development not be reduced below a level of significance, additional mitigation measures may be required on a project-specific basis.

5.3.7.4 Significance After Mitigation

Implementation of the Mitigation Framework as detailed in Mitigation Measures AQ-1 and AQ-2 would reduce particulate matter emissions; however, impacts resulting from particulate matter would remain significant and unavoidable as future projects may not be able to reduce operational emissions of PM_{10} to a level less than significant. Should operational particulate matter emissions from future development not be reduced below a level of significance, additional mitigation measures may be required on a project-specific basis.

5.3.8 Issue 6: Odor

Issue 6: Would the proposed FPA create objectionable odors affecting a substantial number of people?

5.3.8.1 Impact Analysis

The proposed FPA would allow for future residential and commercial development and does not include industrial or agricultural uses that have the potential to emit objectionable odors. Under the proposed FPA, industrial uses would be removed and the future mixed-use development that would occur with proposed FPA implementation would not be expected to create or emit objectionable odors. Therefore, impacts would be less than significant.

5.3.8.2 Significance of Impact

Future development projects allowed under the proposed FPA would not be expected to create or emit objectionable odors. Therefore, there would be no impacts associated with odor.

5.3.8.3 Mitigation Framework

Implementation of the proposed FPA would not create objectionable odors affecting a substantial number of people; therefore, no mitigation measures are required

5.3.8.4 Significance After Mitigation

No mitigation is required; therefore, there would be no impacts after mitigation.

5.3.6 Conclusion

Implementation of the proposed FPA has the potential to result in significant and unmitigable long-term operational air quality impacts resulting from cumulatively considerable increases in criteria pollutants, some of which the SDAB is currently under federal and/or state non-attainment. While it is anticipated that emissions from construction of individual development projects allowed under the proposed FPA would not result in significant air quality impacts, the potential exists for cumulatively considerable emissions to occur should multiple projects be constructed simultaneously. However, this scenario is unlikely, and with future project implementation in compliance with the Mitigation Framework as detailed in Mitigation Measure AQ-1, short-term cumulative impacts would be reduced to a less than significant level. Even with implementation of Mitigation Measure AQ-2, long-term operational air quality impacts would remain significant and unmitigable until determined less than significant upon future project-specific review.

5.4 Greenhouse Gas Emissions

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with greenhouse gas emissions. Information contained in this section is summarized from the ***Air Quality and Greenhouse Gas Study*** for the Proposed FPA, prepared by Rincon Consulting, Inc. (Rincon), dated January 2014 (Appendix C of this PEIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix C, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix C, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.4.1 Existing Conditions

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC, 2007), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (90% or greater chance) that the global average net effect of human activities since 1750 has been one of warming. The prevailing scientific opinion on climate change is that most of the observed increase in global average temperatures, since the mid-20th century, is likely due to the observed increase in anthropogenic greenhouse gas (GHG) concentrations.

GHGs are gases that absorb and re-emit infrared radiation in the atmosphere. GHGs such as water vapor and carbon dioxide are abundant in the earth's atmosphere. Without these gases, the earth's ambient temperature would either be extremely hot during the day or blisteringly cold at night. However, because these gases can both absorb and emit heat, the earth's temperature does not sway too far in either direction.

Over the years, as human activities resulted in burning fossil fuels, stored carbon has been released into the air in the form of Carbon Dioxide (CO_2), and to a much lesser extent Carbon Monoxide (CO). Scientists have measured this rise in CO_2 in the atmosphere, and fear that it may be heating the planet. It is

believed that other greenhouse gases such as Methane (CH_4), and Nitrous Oxide (NO) contribute to planetary heating.

According to *The Impacts of Sea-Level Rise on the California Coast*, prepared by the California Climate Change Center (CCCC), climate change has the potential to induce substantial sea level rise in the coming century. Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state. Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. As discussed above, climate change could potentially affect: the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion.

Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater air pollution could render plants more susceptible to pest and disease outbreaks. Scientists project that the average global surface temperature could rise by 1.0-4.5°F (0.6-2.5°C) in the next 50 years, and 2.2-10°F (1.4-5.8°C) in the next century, with substantial regional variation. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes, such as carbon cycling and storage.

Greenhouse Gases of concern as analyzed in this study are Carbon Dioxide (CO_2), Methane (CH_4), and Nitrous Oxide (N_2O). To simplify GHG calculations, both CH_4 and N_2O can be converted to an equivalent amount of CO_2 or CO_2E. CO_2E is calculated by multiplying the predicted levels of CH_4 and N_2O by a Global Warming Potential (GWP) or a multiplication factor measure of how much a given mass of greenhouse gas is estimated to contribute to global warming relative to the same mass of carbon dioxide (whose GWP is by convention equal to 1). The exact calculations are complicated; however, the U.S. Environmental Protection Agency publishes GWPs for various GHGs and reports that the GWP for CH_4 and N_2O is 21 and 310, respectively.

5.4.1.1 Regulatory Setting

A. International Regulations

The United States is, and has been, a participant in the United Nations Framework Convention on Climate Change (UNFCCC) since it was produced by the United Nations in 1992. The UNFCCC is an international environmental treaty with the objective of, "stabilization of GHG concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system." This is generally understood to be achieved by stabilizing global GHG concentrations between 350 and 400 ppm, in order to limit the global average temperature increases between 2 and 2.4°C above preindustrial levels. The UNFCC itself does not set limits on GHG emissions for individual countries or enforcement mechanisms. Instead, the treaty provides for updates, called "protocols," that would identify mandatory emissions limits.

Kyoto Protocol

The Kyoto Protocol established commitments for industrialized nations to reduce their collective emissions of six GHGs (CO_2, CH_4, N_2O, SF_6, HFCs, and PFCs) to 5.4 percent below 1990 levels by 2012. The United States is a signatory of the Kyoto Protocol, but Congress has not ratified it and the United States has not bound itself to the Protocol's commitments. The first commitment period of the Kyoto Protocol ended in 2012. Governments, including 38 industrialized countries, agreed to a second commitment period of the Kyoto Protocol, beginning January 1, 2013 and ending either on December 31, 2017 or December 31, 2020, to be decided by the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol at its seventeenth session. In Durban (17th session of the Conference of the Parties in Durban, South Africa, December 2011), governments decided to adopt a universal legal agreement on climate change as soon as possible, but not later than 2015. Work will begin on this immediately under a new group called the Ad Hoc Working Group on the Durban Platform for Enhanced Action. Progress was also made regarding the creation of a Green Climate Fund (GCF) for which a management framework was adopted.

B. Federal Regulations

Climate Change Technology Program

The Climate Change Technology Program (CCTP) is a multi-agency research and development coordination effort (led by the Secretaries of Energy and Commerce) that is charged with carrying out the President's National Climate Change Technology Initiative. The United States Environmental Protection Agency's (USEPA) guidance document is directed at state agencies responsible for air pollution permits under the Federal Clean Air Act (FCAA) to help them understand how to implement GHG reduction requirements while mitigating costs for industry.

C. State Regulations

Assembly Bill (AB) 1943

AB 1493 (2002), referred to as "Pavley," requires California Air Resources Board (CARB) to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, USEPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year.

Executive Order (EO) S-3-05

EO S-3-05 establishes statewide GHG emissions reduction targets. EO S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent of 1990 levels. In response to EO S-3-05, California Environmental Protection Agency (CalEPA) created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with the existing authority of the state agencies.

The California Global Warming Solutions Act (AB 32)

Operating under the assumption that Global Warming is a real phenomenon and that atmospheric CO_2 is the single largest contributor to the phenomenon, the California State Legislature passed the California Global Warming Solutions Act of 2006 (AB 32) which requires the California Air Resources Board (CARB) to develop regulations and mechanisms that will ultimately reduce California's greenhouse gas emissions by 25 percent by 2020. Mandatory caps will begin in 2012 for significant sources and ratchet down to meet the 2020 goals. Specifically, AB 32 requires CARB to:

1) Establish a statewide greenhouse gas emissions cap for 2020, based on 1990 emissions by January 1, 2008.
2) Adopt mandatory reporting rules for significant sources of greenhouse gases by January 1, 2009.
3) Adopt a plan by January 1, 2009 indicating how emission reductions will be achieved from significant greenhouse gas sources via regulations, market mechanisms and other actions.
4) Adopt regulations by January 1, 2011 to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gas, including provisions for using both market mechanisms and alternative compliance mechanisms.
5) Convene an Environmental Justice Advisory Committee and an Economic and Technology Advancement Advisory Committee to advise CARB.
6) Ensure public notice and opportunity for comment for all CARB actions.
7) Prior to imposing any mandates or authorizing market mechanisms, CARB must evaluate several factors, including but not limited to, impacts on California's economy, the environment and public health; equity between regulated entities; electricity reliability; conformance with other environmental laws; and that the rules do not disproportionately impact low-income communities.

Scoping Plan

After completing a comprehensive review and update process, the CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2E. A Scoping Plan was approved by CARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, recycling, and solid waste, among other measures.

EO S-01-07

EO S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.

Senate Bill (SB) 97

SB 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill (SB) 375

Senate Bill (SB) 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional greenhouse gas emission reduction targets to be achieved from vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, CARB adopted final regional targets for reducing greenhouse gas emissions from 2005 levels by 2020 and 2035.

ARB Resolution 07-54

ARB Resolution 07-54 establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005 percent of California's total inventory of GHG emissions for 2004.

Senate Bill (SB) 2X

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

Title 24, Part 6-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 2008 Title 24, or the 2008 Energy Code, became effective January 1, 2010. 2008 Title 24 requires energy savings of 15–35 percent above the former 2005 Title 24 Energy Code. At a minimum, residential buildings must achieve a 15-percent reduction in their combined space heating, cooling, and water heating energy consumption compared to the 2005 Title 24 standards. Incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum 15 percent reduction over the 2005 Title 24. The reference to 2005 Title 24 is relevant in that many of the state's long-term energy and GHG

reduction goals identify energy-saving targets relative to the 2005 Title 24. By reducing California's energy consumption, emissions of statewide GHGs may also be reduced.

With respect to new construction and major renovations, compliance with the current Energy Code must be demonstrated 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 incremental increases in energy efficiency given selection of various HVAC, sealing, glazing, insulation, and other building techniques. 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 24.

Title 24, Part 11-California Green Building Standards

In 2007, the Governor directed the California Building Standards Commission to work with state agencies on the adoption of green building standards for residential, commercial, and public building construction for the 2010 code adoption process. A voluntary version of the California Green Building Standards Code, referred to as CalGreen, was added to Title 24 as Part 11 in 2009. The 2010 version of CalGreen took effect January 1, 2011, and instituted mandatory minimum environmental performance standards for 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 nonresidential buildings. The mandating performance standards for new construction include:

- 20 percent reduction in indoor water use relative to specified baseline levels, with voluntary goals for reductions of 30 percent and over;
- water submetering;
- diversion of 50 percent waste from landfills, with voluntary goal reductions of 65 percent for homes and 80 percent for commercial projects;
- inspections of energy systems to ensure optimal working efficiency, with voluntary goals for 15 percent (Tier I) and 30 percent (Tier II) in exceedance of 2008 Title 24; and,
- requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards.

Similar to the compliance reporting procedure described above for demonstrating energy code compliance in new buildings and major renovations, compliance with the CalGreen water reduction requirements must be demonstrated through completion of water use reporting forms for both residential and non-residential buildings. The water use compliance form 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.

D. Local Regulations and CEQA Requirements

The adopted State CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The South Coast Air Quality Management District (SCAQMD) has adopted quantitative significance thresholds for GHGs.

San Diego Sustainable Community Program/Cities for Climate Protection

In 2002, the City Council approved the San Diego Sustainable Community Program (SCP) and requested that an advisory committee be established to provide recommendations that would decrease GHG emissions from City operations. The City subsequently became a participant in the International Council for Local Environmental Initiatives (ICLEI) Cities for Climate Protection (CCP) campaign to reduce GHG emissions and in the California Climate Action Registry.

As a participant in the ICLEI CCP program, the City made a commitment to voluntarily decrease its GHG emissions by 2030 through a series of five milestones: (1) establish a CCP campaign, (2) engage the community to participate, (3) sign the U.S. Mayors Climate Protection Agreement, (4) take initial solution steps, and (5) perform a GHG audit. The City has advanced past Milestone 3 by signing the Mayor's agreement and establishing actions to decrease City operations' emissions.

Climate Protection Action Plan

In July 2005, the City developed a Climate Protection Action Plan (CPAP) that identifies policies and actions to decrease GHG emissions from City operations. Recommendations included in CPAP for transportation included measures such as increasing carpooling and transit ridership, improving bicycle lanes, and converting the City vehicle fleet to low emission or non-fossil-fueled vehicles. Recommendations in the CPAP for energy and other non-transportation emissions reductions included increasing building energy efficiency (e.g., requiring that all City projects achieve the U.S. Green Building Council's LEED Silver standard); reducing waste from City operations; continuing use of landfill methane as an energy source; reducing the urban heat island by avoiding dark roofs and roads which absorb and retain heat; and increasing shade tree and other vegetative cover plantings.

Because of City actions implemented between 1990 and 2002, moderate GHG emissions reductions were reported in the CPAP. City actions taken to capture methane gas from solid waste landfills and sewage treatment plants resulted in the largest decrease in GHG emissions. Actions taken thus far to incorporate energy efficiency and alternative renewable energy reached only 5 percent of the City's 2010 goal. The transportation sector remains a significant source of GHG emissions in 2010 and has had the lowest GHG reductions, reaching only 2.2 percent of the goal for 2010. The recently amended City General Plan includes a Policy CE-A.13 to regularly monitor and update the CPAP. The Climate Mitigation Adaptation Plan (CMAP) was later developed to provide a mechanism for the City to achieve the goals of AB 32 and the CARB Scoping Plan at a program level. Additional detail regarding this plan is presented below.

Sustainable Building Policies

In several of its policies, the City aims to reduce GHG emissions by requiring sustainable development practices in City operations and incentivizing sustainable development practices in private development. In Council Policy 900-14—Green Building Policy, adopted in 1997, Council Policy 900-16—Community Energy Partnership, and the updated Council Policy 900-14—Sustainable Buildings Expedite Program, last revised in 2006, the City established a mandate for all City projects to achieve LEED Silver (or equivalent) for all new buildings and major renovations over 5,000 square feet. Incentives are also provided to private developers through the Expedite Program, which expedites project review of green building projects and discounts project review fees.

The City has also enacted codes and policies aimed at helping the City achieve the state's 75-percent waste diversion mandate under AB 341, including the Refuse and Recyclable Materials Storage Regulations (SDMC Chapter 14, Article 2, Division 8), Recycling Ordinance (O-19678; SDMC Chapter 6, Article 6, Division 7), and the Construction and Demolition (C&D) Debris Deposit Ordinance (0-19420 & 0-19694; SDMC Chapter 6, Article 6, Division 6). Further discussion of AB 341 and City policies and ordinances is included in Section 4.15, Public Utilities.

California Air Pollution Controls Officers Association (CAPCOA) CO_2 Screening Levels

CAPCOA and CARB currently publish CO_2 screening levels for use in CEQA reporting. The screening level is set at 900 metric tons of CO_2 per year and is 'recommended' for all new projects within the State of California for compliance with the intent of AB 32. Operational levels due to a project action above the 900 MT screening value will be subject to additional recommendations for compliance.

City of San Diego General Plan

The 2008 General Plan update included 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.

Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the programmatic Environmental Impact Report (PEIR) for the General Plan. A PEIR Mitigation Framework was included that indicated "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."

City of San Diego Conservation Element

There are no specific local quantitative regulations that have been promulgated to control GHG emissions; however, both the City of San Diego and SANDAG have adopted policies and standards to reduce emissions in the region. The City of San Diego first adopted climate change policies in its City of San Diego Climate Protection Action Plan (City, 2005). The plan identified sources of GHGs within the City and identified policies and developed recommendations to reduce GHG emissions. The City of San Diego's General Plan (2008) addresses climate change in the Conservation Element of the plan. Policies that address local GHG mitigation strategies in San Diego are integrated within the General Plan, and applicable to development projects. Together, this collection of policies support and promote the adopted recommendations outlined in the City's Climate Protection Action Plan. Typically, these policies are implemented through the use of updated building codes or architectural plans. As part of the Conservation Element, the City's policies pertinent and related to Climate Change and Sustainable Development from a private developer's perspective are:

CE.A.9: Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:

- Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
- Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;
- Removing code obstacles to using recycled materials in buildings and for construction;
- Implementing effective economic incentives to recycle construction and demolition debris (see also Public Facilities Element, Policy PF-I.2).

CE.A.10: Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.

a. Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.

b. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic, metals, yard waste and other materials as needed.

CE.A.11: Implement sustainable landscape design and maintenance.

a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.

b. Encourage composting efforts through education, incentives, and other activities.

c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities (see also Recreation Element, Policy RE-A.6 and A.7).

d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.

e. Reduce use of lawn types that require high levels of irrigation.

f. Strive to incorporate existing mature trees and native vegetation into site designs.

g. Minimize the use of landscape equipment powered by fossil fuels.

h. Implement water conservation measures in site/building design and landscaping.

i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible. (see Policy CE-A.12).

CE.A.12: Reduce the San Diego Urban Heat Island, through actions such as:

- Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up;
- Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots;
- Reducing heat buildup in parking lots through increased shading or use of cool paving materials as feasible (see also Urban Design Element, Policy UD-A.12).

SANDAG Climate Action Strategy

SANDAG's Climate Action Strategy is a guide for SANDAG on climate change policy. The Strategy identifies a range of potential policy measures for consideration as SANDAG updates long-term planning documents like the Regional Transportation Plan and Regional Comprehensive Plan, and as local jurisdictions update their General Plans and other community plans. The goals of the Climate Action Strategy include the reduction of vehicle miles traveled and use of alternatives modes of transportation.

SANDAG has also developed a Sustainable Communities Strategy (SCS) in accordance with California Senate Bill 375 (SB 375). The SCS is a new element of the 2050 RTP. The legislation requires Metropolitan Planning Organizations (MPO) to prepare a SCS as part of their RTPs, along with the traditional policy, action, and financial requirements. After more than two years of extensive public input, the SANDAG Board of Directors adopted the final RTP with a SCS on October 28, 2011, making it the first agency in California to

do so. The SCS lays out how the region will meet GHG reduction targets set by CARB. CARB's targets call for the region to reduce per capita emissions seven percent by 2020 and 13 percent by 2035 from a 2005 baseline. There are no mandated targets beyond 2035.

Under SB 375, which went into effect in 2009, a SCS must demonstrate how development patterns and transportation network, policies, and programs can work together to achieve greenhouse gas emission reduction targets for cars and light trucks, if there is a feasible way to do so. If a MPO cannot meet the targets through a SCS, then the region is required to develop an alternative planning strategy that demonstrates how targets could be achieved. In essence, the SCS includes four building blocks:

1. *A land use component that accommodates the Regional Housing Needs Assessment (RHNA) and includes the protection of sensitive resources, including areas protected under habitat conservation plans;*
2. *Transportation networks including highways, transit, and local streets and roads;*
3. *Transportation demand management strategies; and*
4. *Transportation system management programs and policies.*

~~Climate Mitigation and Adaptation Plan (CMAP)~~ This was not adopted by the City of San Diego and has been superseded by the Climate Action Plan.

~~A citywide Draft Climate Mitigation and Adaptation Plan was prepared by the City of San Diego to provide a mechanism for the City to achieve the goals of AB 32 and the CARB Scoping Plan at a program level. The CMAP elements were prepared pursuant to guidance from the amended CEQA Guidelines and CARB recommendations for what constitutes an effective GHG reduction plan. Section 15183.5 of the amended CEQA Guidelines includes requirements for plans that serve to tier and streamline the analysis of GHG emissions.~~

~~The City's CMAP is intended to establish a planning horizon of 2013 through 2035; and quantify GHG emissions; establishes GHG reduction targets for 2020; identify strategies and measures to reduce GHG emissions; and provide guidance for monitoring progress on an annual basis.~~

City of San Diego Climate Action Plan (CAP)

In December of 2013, the City of San Diego released a draft Climate Action Plan (CAP) which identifies five strategies to reduce GHG emissions: energy and water efficient buildings, clean and renewable energy, multimodal transportation options, zero waste management, and urban forest and local food production. The CAP does not contain GHG thresholds and is not currently considered an applicable regulatory document due to its draft form.

5.4.2 Significance Determination Thresholds

The City of San Diego's CEQA Significance Determination Thresholds do not identify quantitative thresholds for determining significance of GHG emissions. For the purpose of determining significance, the analysis below is based on guidance contained in Appendix G of the State California Environmental Quality Act

(CEQA) Guidelines. A significant impact resulting from greenhouse gases would occur if the proposed FPA would result in:

- *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or,*
- *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

As discussed in Section 15064.4 of the CEQA Guidelines, 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. Section 15064.4 further provides that 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.

Section 15064.4 also advises a lead agency to consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

In order to serve as a guide for determining when a project triggers the need for a GHG significance determination, the City of San Diego has established an interim screening criteria for GHG emission analysis. Based on guidance in the CAPCOA report "CEQA & Climate Change," dated January 2008, the City's memorandum entitled "*Addressing Greenhouse Gas Emissions from Projects Subject to CEQA*" (City of San Diego, 2010) utilizes a screening criterion of 900 metric tons of CO_2E as a conservative measure for requiring further analysis of GHG emissions. Projects with emissions above the 900 metric tons measure are required to evaluate whether emissions can be reduced below "business as usual" (BAU) levels. The City has identified a target of 28.3 percent below BAU as its significance threshold, based on the California CARB's Scoping Plan and Year 2020 BAU forecast model, which represents the GHG emissions that would be expected to occur without any GHG project reducing features or mitigation as mandated under AB 32.

Thus, if the project's 2020 GHG emissions, with incorporation of GHG-reducing regulations and design features, represent a 28.3 percent reduction relative to the project's BAU GHG emissions, the project would not result in a significant impact to global climate change.

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.4.3 Issue 1: Generate Greenhouse Gas Emissions

Issue 1: Would the proposed FPA generate greenhouse gas emissions, either directly or indirectly, that may have a cumulatively significant impact on the environment?

5.4.3.1 Impact Analysis

A. Construction Related Impacts

Construction of future development projects within the proposed FPA area would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. It is anticipated that future grading activities within the proposed FPA area would require approximately 7,222 cubic yards of soil to be exported from the site. Site grading typically generates the greatest amount of emissions due to the use of grading equipment and oil hauling. For this analysis, it was assumed that construction of future development associated with the proposed FPA would commence in January 2015 and would be completed in 2035. Emissions associated with the construction period were estimated using the California Emissions Estimator Model (CalEEMod version 2013.2.2) computer model, based on the projected maximum amount of equipment that would be used onsite at one time.

~~Operational emissions from electricity and natural gas use were estimated using CalEEMod.~~ Construction activity for the proposed FPA would generate an estimated 99,718 metric tons of carbon dioxide equivalent (CO_2E), as shown in Table 5.4-1. Amortized over a 30-year period to assimilate with the other GHG calculations that ~~(the~~ assume~~d~~ emissions over the life of the project~~)~~, construction allowed from the proposed FPA would generate 3,324 metric tons of CO_2E per year.

Table 5.4-1: Estimated Construction Related Greenhouse Gas Emissions

~~Year~~Emission Source	Annual Emission (MT CO_2E)
~~Total~~Project Construction	99,718
Project Construction Amortized over 30 years	3,324 ~~metric tons~~ per year

Source: Rincon, 2014.

B. Electricity Usage

Operation of future development within the proposed FPA area would consume both electricity and natural gas. The generation of electricity through combustion of fossil fuels typically yields CO_2, and to a smaller extent, N_2O and CH_4. Natural gas emissions can be calculated using default values from the CEC sponsored CEUS and RASS studies which are built into CalEEMod. As shown in Table 5.4-2 below, the overall

net increase in energy use within the proposed FPA area would result in approximately 7,787 metric tons of CO_2E per year.

Table 5.4-2: Estimated Annual Energy-Related Greenhouse Gas Emissions

Emission Source	Annual Emissions (MT CO_2E)
Existing Uses	
Electricity	6,233 metric tons
Natural Gas	1,293 metric tons
Subtotal	**7,527 metric tons**
Proposed FPA	
Electricity	12,230 metric tons
Natural Gas	3,171 metric tons
Subtotal	**15,401 metric tons**
Total Net New Emissions (Proposed minus Existing)	**7,874 metric tons**

Source: Rincon, 2014

C. Area Emissions

The CalEEMod model was used to calculate direct sources of air emissions located throughout the potential new residential and commercial sites within the proposed FPA area. This includes hearths, consumer product use, architectural coatings, and landscape maintenance equipment. As shown in Table 5.4-3, the proposed area sources would generate approximately 102 net new metric tons CO_2E per year.

Table 5.4-3: Estimated Annual Area Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Existing Uses	0.02 metric tons
Proposed FPA	102 metric tons
Total Net New Emissions (Proposed minus Existing)	**102 metric tons**

Source: Rincon, 2014.

D. Transportation Emissions

Mobile source GHG emissions were estimated using the average daily trips calculated by CalEEMod for future proposed development within the proposed FPA. Table 5.4-4 shows the estimated mobile emissions of GHGs for the proposed FPA based on the estimated annual Vehicle Miles Traveled (VMT). CalEEMod does not calculate N_2O emissions related to mobile sources. N_2O emissions were calculated based on the proposed FPA's VMT using calculation methods provided by the California Climate Action Registry General Reporting Protocol. As shown in Table 5.4-4, the proposed FPA would increase vehicle emissions by approximately 41,594 metric tons per year.

Table 5.4-4: Estimated Annual Mobile Source Emissions of Greenhouse Gases

Emission Source	Annual Emissions (MT CO_2E)
Existing Uses	
Mobile Emissions (CO_2 & CH_4)	19,105 metric tons
Mobile Emissions (N_2O)	908 metric tons
Subtotal	**20,013 metric tons**
Proposed FPA	
Mobile Emissions (CO_2 & CH_4)	57,959 metric tons
Mobile Emissions (N_2O)	3,648 metric tons
Subtotal	**61,607 metric tons**
Total Net New Emissions (Proposed minus Existing)	**41,594 metric tons**

Source: Rincon, 2014

E. Solid Waste Emissions

The CalEEMod results indicate that future development within the proposed FPA area would result in approximately 1,612 metric tons of CO_2E per year associated with solid waste disposed within landfills, as calculated in Table 5.4-5.

Table 5.4-5: Estimated Annual Soild Waste Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Existing Uses	353 metric tons*
Proposed FPA	1,965 metric tons
Total Net New Emissions (Proposed minus Existing)	**1,612 metric tons**

*Assumes existing uses onsite are diverting 50% of waste in accordance with AB 939.
Source: Rincon, 2014

F. Water Usage

Based on the amount of electricity generated to supply and convey water for the future development projects allowed with the implementation of the proposed FPA, as shown in Table 5.4-6, water use associated with proposed FPA would generate approximately 3,443 metric tons of CO_2E per year.

Table 5.4-6: Estimated Annual Water Use Greenhouse Gas Emissions

Emission Source	Annual Emissions (CO_2E)
Existing Uses	1,525 metric tons
Proposed FPA	4,968 metric tons
Total Net New Emissions (Proposed minus Existing)	**3,443 metric tons**

Source: Rincon, 2014

G. Cumulative Totals

Table 5.4-7 combines the net new construction, operational, and mobile GHG emissions associated with future development projects allowed with the implementation of the proposed FPA. As discussed above, temporary emissions associated with construction activity are amortized over 30 years (the anticipated life of the project). The combined annual net increase in CO_2E emissions would total approximately 57,949 metric tons per year.

Table 5.4-7: Combined Annual Net New GHG Emissions from the Proposed FPA

Emission Source	Annual Emissions (MT CO_2E)
Existing Uses	
Operational	
Energy	7,527 metric tons
Area	0.02 metric tons
Solid Waste	353 metric tons
Water	1,525 metric tons
Mobile Emissions	20,013 metric tons
Subtotal	**29,418 metric tons**
Proposed FPA	
Construction	**3,324 metric tons**
Operational	
Energy	15,401 metric tons
Area	102 metric tons
Solid Waste	1,965 metric tons
Water	4,968 metric tons
Mobile	61,607 metric tons
Subtotal	**87,367 metric tons**
Total Net New Emissions (Proposed minus Existing)	**57,949 metric tons (MT)**

Source: Rincon, 2014

The BAU calculation is an estimate of GHG emissions that would be expected to occur without any GHG reducing features or mitigation, consistent with AB 32. In the absence of specific federal, state or local thresholds, GHG emissions associated with a specific project are not considered cumulatively considerable if design and operational features incorporated into a project reduces emissions by more than approximately 28.3% (the statewide average that is commonly acceptable). Although the proposed FPA is programmatic in nature (not a specific project) and does not include specific individual projects at this time, the following discussion uses the 900 MT annual screening threshold, because the City currently does not have a programmatic or plan level threshold.

As shown in Table 5.4-7, BAU GHG emissions would exceed the 900 annual MT screening threshold. Therefore, a 28.3% reduction (i.e., 24,725 annual MT of CO_2E) in BAU emissions must be demonstrated to avoid a significant GHG impact. For development projects within the proposed FPA area, GHG emissions would be reduced in comparison to the BAU scenario as a result of project amenities and design and operational features along with state and federal GHG reduction measures. The proposed FPA would reduce vehicle trips compared to BAU because of its proximity to existing transit service (bus and trolley service), increased density onsite (urban infill), mixed-use nature, and pedestrian friendly design. Individual development projects within the proposed FPA area would also be required to achieve at least a 50% waste diversion rate in accordance with AB 939 and to incorporate low-flow plumbing fixtures in accordance with City of San Diego code requirements (Chapter 14 Article 7 Division 3). (These standards are set by California Building Code) To reduce energy consumption, required features include providing energy efficient appliances and energy efficient lighting in all new structures. Table 5.4-8 shows the mitigated GHG emissions associated with implementing the above-referenced design/operational features. With implementation of these features, GHG emissions for future development within the proposed FPA would be reduced by 17,905 MT annually or 20.5%.

Table 5.4-9 lists existing state measures for GHG emissions reductions and quantifies the total reduction in metric tons of CO_2E per year that development of the proposed FPA area would generate in comparison to the BAU scenario. As shown in Table 5.4-9, implementation of state measures would reduce proposed FPA area emissions by an estimated 20,743 CO_2E per year.

As shown in Table 5.4-10, with the implementation of design features (Table 5.4-8) into future development projects within the proposed FPA area and the implementation of State reduction measures (Table 5.4-9), the proposed FPA would have a combined total reduction of approximately 38,648 CO_2E per year or approximately 44.2%. As such, GHG emissions associated with future development within the proposed FPA would be reduced by more than 28.3% as compared to the BAU scenario. Therefore, impacts related to GHG emissions would be less than significant based on City criteria.

5.4.3.2 Significance of Impact

Impacts were evaluated for significance using the City of San Diego's interim screening threshold of 900 MT CO_2E. For emissions that exceed this threshold and cannot be reduced to 28.3% below BAU levels, the impact is considered significant.

Table 5.4-8: Combined Annual GHG Emissions with Design Features to Reduce Emissions

Emission Source/Design Feature to Reduce GHG Emissions	Reduction in Annual Emissions (MT CO_2E)
Solid Waste	
Implement on-site recycling program to achieve 50% landfill diversion.	(982)
Water	
Water Use Reduction a) Low Flow Plumbing Fixtures – Install low flow plumbing fixtures in all building to reduce water use. b) Drought Tolerant Landscaping – Install landscaping throughout the site that would provide shade trees and carbon storage. (City of San Diego has an environmentally-friendly plant list and street tree selection guide)	(791)
Transportation	
a) Increase density b) Improve walkability design c) Improve accessibility d) Increase transit accessibility e) Improve pedestrian network (as identified in technical report – See Appendix C)	
Mobile Emissions (CO_2 & CH_4)	(15,150)
Mobile Emissions (N_2O)	(982)
Total Reduction from with Design Features to Reduce GHG Emissions	**(17,905 MT CO_2E)**
Total Emissions from the Proposed FPA with Design Features to Reduce GHG Emissions	**69,462 MT CO_2E**
BAU Total	**87,367 MT CO_2E**
% Reduction of Emissions Compared to BAU Total	**(20.5%)**

Source: Rincon, 2014.

Table 5.4-9: Existing State Measures for GHG Emission Reductions

Measure	Sector	% Reduction from Business-As-Usual Scenario (Sector Specific)[1]	Total CO_2E from Business-As-Usual Scenario Sector[2]	Reduction in Annual Emissions (MT CO_2E)
Renewable Portfolio Standard (33% by 2020)	Energy Use (Electricity)	15.40%	12,230	(1,871)
Renewable Electricity Standard	Energy Use (Electricity)	14.25%	12,230	(1,743)
2013 Title 24 Energy Code Requirements	Energy Use (Natural Gas and Electricity)	15%	15,401	(2,310)
Assembly Bill 1493: Pavley I & II	Transportation	14.06%	61,607	(8,662)
Medium/Heavy Duty Vehicles (Aerodynamic Efficiency and Vehicle Hybridization)	Transportation	0.62%	61,607	(382)
Regional Transportation Related GHG Targets (SB 375)	Transportation	3.75%	61,607	(2,310)
Vehicle Efficiency Measures	Transportation	5.625%	61,607	(3,465)
			State Measure Reduction	**(20,743)**
Total Emissions from the Proposed FPA with Existing State Measures to Reduce GHG Emissions				**87,367 MT CO_2E**
Percent Reduction from Total Business-As-Usual Emissions				**23.7%**

[1]Percent Reduction from business-as-usual calculated based on the CARB scoping Plan reductions for sector-specific activity. CARB Scoping Plan, December 2008

[2]Emissions from individual sectors as listed in Table 14: Combined Annual Emissions of Greenhouse Gases Business-As-Usual Scenario.

( ) denotes reduction

Source: Rincon, 2014.

As shown in Table 5.4-10, with the implementation of the design features described in Table 5.4-8 in future development projects and with implementation of State reduction measures (Table 5.4-9), development of the proposed FPA would have a combined total reduction of approximately 38,648 CO_2E per year or approximately 44.2%. As such, GHG emissions associated with future development projects within the proposed FPA area would be reduced by more than 28.3% as compared to the BAU scenario. Therefore, impacts related to GHG emissions would be less than significant based on City criteria.

Table 5.4-10: Total Reduction of GHG

Business-As-Usual Total GHG from the Proposed FPA	87,367 metric tons CO_2E
Combined Reductions from the Proposed FPA Design Features and State Measures	(38,648 metric tons CO_2E)
Proposed FPA Total	**48,719 metric tons CO_2E**
% Reduction from Business-As-Usual	**44.2%**

Source: Rincon, 2014.

5.4.3.3 Mitigation Framework

Implementation of the proposed FPA would not result in significant direct or cumulative impacts related to GHG emissions; and therefore, no mitigation measure is required.

5.4.3.4 Significance After Mitigation

No mitigation would be required; therefore, there will be no impacts after mitigation.

5.4.4 Issue 2: Conflict with Plans

Issue 2: Would the proposed FPA conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

5.4.4.1 Impact Analysis

The proposed FPA 's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs is evaluated below. Applicable state and federal plans, policies, and regulations that are currently in effect are discussed in Section 5.4.1.1 above. The City has adopted policies in both its Climate Protection Action Plan and General Plan that directly address GHG emissions, setting a goal of a 15-percent reduction in GHG emissions by 2010. The City is currently in the process of developing a CAP, which will identify strategies and measures to meet GHG reduction targets. The CAP includes four categories of strategies to reduce GHG sources: energy and water efficiency buildings, clean and renewable energy, multimodal transportation options, zero waste management, and urban forest and local food production. The proposed FPA would accommodate mixed-use, transit-oriented development that includes energy efficiency and waste reduction features. Table 5.4-11 provides an analysis of the proposed FPA's consistency with the City of San Diego General Plan's Climate Change and Sustainable Policies (2008). Based on Table 5.4-11, the proposed FPA would be consistent with the General Plan.

Table 5.4-11: Proposed FPA's Consistency with Applicable San Diego General Plan Climate Change and Sustainable Policies

Policy	Proposed FPA Consistency
Conservation Element	
CE-A.2 Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to: • Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space; • Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency; • Improve energy efficiency, especially in the transportation sector and buildings and appliances; • Reduce the Urban Heat Island effect through sustainable design and building practices, as well as planting trees (consistent with habitat and water conservation policies) for their many environmental benefits, including natural carbon sequestration; • Reduce waste by improving management and recycling programs; • Plan for water supply and emergency reserves.	**Consistent** The proposed FPA would facilitate mixed-use, urban infill and transit-oriented development. The proposed FPA is located in proximity to existing transit corridors and transit services. The proposed FPA area is located near the Grantville Light Rail Trolley Station, would be a mixed-use development that would include commercial uses, and would emphasize pedestrian orientation. The proposed FPA would therefore promote alternative transportation and would reduce overall vehicle travel by encouraging the use of public transit, bicycling and walking. Future development within the proposed FPA would adhere to current Title 24 California Building Code standards for energy efficiency. Future development within the proposed FPA area would be required to divert at least 50% of its solid waste thereby reducing waste by improving management and recycling programs. Development in the proposed FPA area would also be subject to all applicable State and City requirements for solid waste reduction as they change in the future.
CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings. a. Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to: o Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; o Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; o Employing self generation of energy using renewable technologies; o Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods; o Reducing levels of non-essential lighting, heating and cooling; and o Using energy efficient appliances and lighting. b. Provide technical services for "green" buildings in partnership with other agencies and organizations.	**Consistent** Future development within the proposed FPA would adhere to current Title 24 California Building Code standards for energy efficiency.

Policy	Proposed FPA Consistency
CE-A.9. Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including: Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases; Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system; Removing code obstacles to using recycled materials in buildings and for construction; and Implementing effective economic incentives to recycle construction and demolition debris.	**Consistent** Future development within the proposed FPA area would be required to divert at least 50% of its solid waste in compliance with AB 939.
CE-A.11. Implement sustainable landscape design and maintenance. a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. b. Encourage composting efforts through education, incentives, and other activities. c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. e. Reduce use of lawn types that require high levels of irrigation. f. Strive to incorporate existing mature trees and native vegetation into site designs. g. Minimize the use of landscape equipment powered by fossil fuels. h. Implement water conservation measures in site/building design and landscaping. i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible.	**Consistent** As required by the City's Municipal Code (Section 147.0301), future development within the proposed FPA area would be required to be equipped with ultra low-water use plumbing fixtures, which will reduce water use within the proposed FPA area.

Policy	Proposed FPA Consistency
CE-A.12. Reduce the San Diego Urban Heat Island, through actions such as: • Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; • Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots; and • Reducing heat build up in parking lots through increased shading or use of cool paving materials as feasible.	**Consistent** Future development within the proposed FPA would adhere to current Title 24 California Building Code standards for energy efficiency.
CE-F.2. Continue to upgrade energy conservation in City buildings and support community outreach efforts to achieve similar goals in the community.	**Consistent** As required by the City's Municipal Code (Section 147.0301) future development within the proposed FPA would be required to be equipped with ultra low-water use plumbing fixtures, reducing water use in the proposed FPA area.
CE-F.4. Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.	**Consistent** Future development projects within the proposed FPA would be required to landscape in accordance with San Diego Municipal Code landscaping regulations.
CE-F.6. Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.	**Consistent** The proposed FPA would allow for mixed-use, urban infill and transit-oriented development. The proposed FPA area is located in proximity to existing transit corridors and transit services. The proposed FPA area is located near the Grantville Light Rail Trolley Station and would include mixed-use development that would include commercial uses, and would emphasize pedestrian orientation. The proposed FPA would therefore promote alternative transportation and would reduce overall vehicle travel by encouraging the use of public transit, bicycling and walking.
CE-I.7. Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use.	**Consistent** Future development within the proposed FPA would adhere to current Title 24 California Building Code standards for energy efficiency.
CE-J.1. Develop, nurture, and protect a sustainable urban/community forest. a. Seek resources and take actions needed to plant, care for, and protect trees in the public right-of-way, parks, and any trees of significant importance. b. Plant large canopy shade trees, where appropriate and with consideration of habitat and water conservation goals, in order to maximize environmental benefits. c. Seek to retain significant and mature trees. d. Provide forest linkages to connect and enhance public parks, plazas, recreation and open space areas.	**Consistent** Future development projects within the proposed FPA area would be required to landscape in accordance with San Diego Municipal Code landscaping regulations.
CE-J.4. Continue to require the planting of trees through the development permit process. a. Consider tree planting as mitigation for air pollution emissions, storm water runoff, and other	**Consistent** Future development projects within the proposed FPA area would be required to landscape in accordance with San Diego Municipal Code landscaping regulations.

Policy	Proposed FPA Consistency
environmental impacts as appropriate.	
Mobility Element	
ME-F.5. Increase the number of bicycle-transit trips by coordinating with transit agencies to provide safe routes to transit stops and stations, to provide secure bicycle parking facilities, and to accommodate bicycles on transit vehicles.	**Consistent** The proposed FPA would facilitate mixed-use, urban infill and transit-oriented development. The proposed FPA area is located in proximity to existing transit corridors and transit services. The proposed FPA area is located near the Grantville Light Rail Trolley Station and would include mixed-use development that would include commercial uses, and would emphasize pedestrian orientation. The proposed FPA would therefore promote alternative transportation and would reduce overall vehicle travel by encouraging the use of public transit, bicycling and walking.
ME-E.6. Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate.	**Consistent** The proposed FPA would facilitate mixed-use, urban infill and transit-oriented development. The proposed FPA area is located in proximity to existing transit corridors and transit services. The proposed FPA area is located near the Grantville Light Rail Trolley Station and would include mixed-use development that would include commercial uses, and would emphasize pedestrian orientation. The proposed FPA would therefore promote alternative transportation and would reduce overall vehicle travel by encouraging the use of public transit, bicycling and walking.

5.4.4.2 Significance of Impact

The proposed FPA would not conflict with the City's sustainable community program, Climate Protection Action Plan, General Plan, or CAP. As such, implementation of the proposed FPA would result in a less than significant impact for this issue area.

5.4.4.3 Mitigation Framework

No mitigation would be required.

5.4.4.4 Significance After Mitigation

No mitigation would be required; therefore, there are no impacts after mitigation.

5.4.5 Conclusions

Although the future development associated with the implementation of the proposed FPA would result in approximately 87,367 $MTCO_2E$ per year, with the implementation of reduction measures, the operational emissions would be reduced by 44.2%, which meets and exceeds the 28.3% reduction goal of AB 32 and the City of San Diego. In addition, the proposed FPA would be consistent with applicable, policies, and regulations adopted for the purpose of reducing GHG emissions. As such, the proposed FPA's contribution to cumulative GHG emissions and climate change would be less than significant.

5.5 Noise

The information contained in this section is summarized from the *Grantville Focused Plan Amendment Noise Impact Study* prepared by Rincon Consultants, Inc. (dated May 2014) (Appendix D of this PEIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix D, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix D, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.5.1 Existing Conditions

The proposed FPA area is primarily comprised of commercial and industrial uses. A small multi-family building is located northwest of the Mission Gorge Road/Vandever Avenue intersection. Kaiser Permanente Foundation Hospital is located in the northwest corner of the proposed FPA area. Single-family residences are located adjacent to the proposed FPA area at its east/northeast boundary, but are not located within it.

5.5.1.1 Existing Noise Standards

A. Construction Noise

Per San Diego Municipal Code (SDMC) Section 59.5.0404, construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 decibels (dB) during the 12-hour period from 7:00 a.m. to 7:00 p.m. Further, construction activity is prohibited 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. Exceptions are allowed and subject to a permit granted by the Noise Abatement and Control Administrator.

B. Exterior Noise

Noise standards are expressed in CNEL, a 24-hour A-weighted average decibel level (dBA) that accounts for frequency correction and the subjective response of humans to noise by adding 5 dBA and 10 dBA to the evening and nighttime hours, respectively.

The City of San Diego requires new projects to meet exterior noise level standards as established in the Land Use Noise Compatibility Guidelines in the City's Noise Element of the General Plan, which specifies compatibility standards for different categories of land use. Table 5.5-1 provides the allowable noise levels by land use as identified in the City's General Plan. As shown, the compatible noise level for noise sensitive land uses, including the multifamily residential use that would be allowed under implementation of the proposed FPA, is 60 dBA 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.

Table: 5.5-1
City of San Diego Land Use
Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL) 60	65	70	75
Open Space and Parks and Recreational				
Community & Neighborhood Parks; Passive Recreation				
Regional Parks; Outdoor Spectator Sports, Golf Courses; Athletic Fields; Outdoor Spectator Sports, Water Recreational Facilities; Horse Stables; Park Maint. Facilities				
Agricultural				
Crop Raising & Farming; Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables				
Residential				
Single Units; Mobile Homes; Senior Housing		45		
Multiple Units; Mixed-Use Commercial/Residential; Live Work; Group Living Accommodations *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 12 Educational Facilities; Libraries; Museums; Places of Worship; Child Care Facilities		45		
Vocational or Professional Educational Facilities; Higher Education Institution Facilities (Community or Junior Colleges, Colleges, or Universities)		45	45	
Cemeteries				
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; Assembly & Entertainment; 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.
Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas. Refer to Section I.
	Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated 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: Rincon, 2014

Table 5.5-2 provides the thresholds of significance for uses affected by traffic noise. As shown, the City has a traffic noise significance threshold of 65 dBA CNEL or less at residential exterior usable spaces.

Table 5.5-2
City of San Diego Traffic Noise Significance Thresholds

Structure or Proposed Use that would be impacted by Traffic Noise	Interior Space	Exterior Useable Space†	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	Structure or outdoor useable area† is < 50 feet from the center of the closest (outside) lane on a street with existing or future ADTs > 7500
Multi-family, schools, libraries, hospitals, day care, hotels, motels, parks, convalescent homes	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	
Offices, Churches, Business, Professional Uses	n/a	70 dB	Structure or outdoor useable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	n/a	75 dB	Structure or outdoor useable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 40,000

Source: City of San Diego, 2011
† If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

The Noise Element of the General Plan states that 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. For single-family units, mobile homes, and senior housing, exterior noise levels ranging between 60 and 65 CNEL are considered "conditionally compatible." Conditionally compatible uses are permissible, provided interior noise levels will not exceed 45 CNEL. Projects sited on land that falls into the "conditionally compatible" noise environment would require an acoustical study.

Although not generally considered compatible, the General Plan also conditionally allows multiple unit and mixed-use residential uses up to 75 CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use with exterior noise levels above the 70 CNEL must include noise attenuation measures to ensure an interior noise level of 45 CNEL and be located in an area where a land use plan allows multiple unit and mixed-use residential uses.

Section 59.5.0101 et seq. of the SDMC, the Noise Abatement and Control Ordinance, regulates the making and creating 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 one-hour, A-weighted equivalent sound level, dBA Leq, is the energy average of the A-weighted sound levels occurring during a one-hour period. The ordinance states that it is unlawful for any person to cause noise by any means to the extent that the one–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.

C. Interior Noise

Noise-sensitive residential/habitable interior spaces have an interior standard of 45 CNEL, as stated in the City's CEQA 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 CNEL at exterior usable areas or interior noise levels exceeding 45 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 CNEL or less when exterior noise sources are 60 CNEL or less. When exterior noise levels are greater than 60 CNEL, consideration of specific non-standard building construction techniques is required.

D. California Code of Regulations

Title 24, Chapter 12, Section 1207, of the California Code of Regulations (CCR) requires that interior noise levels, attributable to exterior sources, not exceed to 45 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 exterior CNEL noise contours exceeds 60 CNEL. The studies must demonstrate that the design of the building will reduce interior noise to 45 CNEL or lower in habitable rooms. If compliance requires windows to be inoperable or closed, the structure must include ventilation or air-conditioning (24 CCR 1207 2010).

E. City of San Diego General Plan Noise Element

The General Plan establishes policies applicable to future development, which would reduce the potential for noise sensitive uses to be exposed to excessive noise levels. The applicable General Plan policies are identified as the following:

Policy NE-A.1: Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.

Policy NE-A.2: Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use to minimize the effects on noise-sensitive land uses.

Policy NE-A.3: Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.

Policy NE-A.4: Require an acoustical study consistent with Acoustical Study Guidelines 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, so that noise mitigation measures can be included in the project design to meet the noise guidelines.

Policy NE-A.5: Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.

Policy NE-B.4: Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling and, where applicable, transit to reduce peak-hour traffic.

Policy NE-C.1: Use site planning to help minimize exposure of noise sensitive uses to rail corridor and trolley line noise.

Policy NE-E.2: Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land uses.

Policy 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 ACLUPs.

Policy 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.

Policy NE-I.3: Consider noise attenuation measures and techniques addressed by the Noise Element, as well as other feasible attenuation measures not addressed as potential mitigation measures, to reduce the effect of noise on future residential and other noise-sensitive land uses to an acceptable noise level.

F. Montgomery Field ALUCP

As discussed in Section 5.1 - Land Use of this PEIR, the airport nearest the planning area is Montgomery Field, which is located 2.25 miles to the northwest. The Montgomery Field ALUCP contains policies that limit residential uses in areas experiencing noise above 60 CNEL by placing conditions on residential uses within the 60 CNEL contour. However, none of the proposed FPA area is located within the 60 CNEL contour of Montgomery Field, San Diego International Airport, or any other airport.

5.5.1.2 Existing Ambient Noise

The primary existing noise sources in the proposed FPA area are transportation and stationary sources. The most common source of transportation noise in the proposed FPA area is motor vehicle (e.g., automobiles, buses, trucks, and motorcycles) operation along the arterial roadways. These include San Diego Mission Road, Fairmount Avenue, Mission Gorge Road, Friars Road, Mission Gorge Place, Alvarado Canyon Road and Waring Road. Interstate-8 is located generally along the southern boundary of the proposed FPA area. Motor vehicle noise is characterized by a high number of individual events which often create a sustained noise level. Motor vehicle noise is the primary noise concern associated with the proposed FPA because it would replace existing office, commercial and industrial uses, which are less sensitive to traffic noise, with mixed use residential along the primary road corridors referenced above. Transportation noise sources also include light rail traffic noise along the San Diego Trolley line and at the Grantville Transit Station. Railway noise results from train and trolley pass-bys, horns, whistles, emergency signaling devices, and stationary bells at grade crossings. Train warning signals operate at these crossings when trains and trolleys approach and cross. Stationary noise sources include industrial and commercial operations.

To establish representative ambient conditions within the proposed FPA area, weekday morning 20-minute noise measurements were taken on January 7, 2014 at five locations, using an ANSI Type II integrating sound level meter. The primary source of noise during monitoring was traffic. Heavy trucks (i.e., 10-18 wheel semi-trucks/trailers) are common throughout the area and contribute to ambient conditions. The temperature during monitoring was approximately 55 degrees Fahrenheit and there was no measurable wind. Noise measurement locations are shown in Figure 5.5-1, and Table 5.5-3 identifies the measured noise levels at each location. Table 5.5-4 shows the approximate vehicle volumes counted during each monitoring event.

Table 5.5-3
Noise Monitoring Results

Measurement Location	Primary Noise Source	Sample Time	Leq (dBA)
1. Southwestern corner of the Mission Gorge Road and Zion Avenue intersection approximately 50 feet from the Mission Gorge Road centerline.	Traffic	Tuesday morning (6:50 to 7:10)	70.2
2. Southwestern corner of Friars Road and Riverdale Street approximately 50 feet from the Friars Road centerline.	Traffic	Tuesday morning (7:15 to 7:35)	70.8
3. Southeastern corner of Mission Gorge Road and Vandever Street intersection approximately 40 feet from the Mission Gorge Road centerline.	Traffic	Tuesday morning (7:45 to 8:05)	62.4
4. Northwestern corner of Fairmount Avenue and Twain Avenue intersection approximately 30 feet from the Fairmount Avenue centerline.	Traffic	Tuesday morning (8:15 to 8:35)	60.3
5. Northeast of the Mission Gorge Road and Mission Gorge Place intersection approximately 60 feet from the Mission Gorge Road centerline.	Traffic	Tuesday morning (8:40 to 9:00)	67.9

Source: Rincon Consultants, Inc., 2014. Field visit using ANSI Type II Integrating sound level meter.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

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Noise Monitoring Locations

FIGURE
5.5-1

Table 5.5-4
Approximate Vehicle Volumes

Monitoring Location	Cars/Light Trucks	Medium Trucks*	Heavy Trucks**
1	520	13	6
2	500	20	20
3	250	2	9
4	105	5	0
5	300	17	5

*Source: Rincon Consultants, Inc., 2014 *- Medium trucks are defined as two-axle, 6-wheel vehicles. These include delivery trucks and transit buses. **- Heavy trucks are defined as 10-18 wheel semi-trucks/trailers.*

5.5.2 Significance Determination Thresholds

Based on the City of San Diego's CEQA Significance Determination Thresholds, a significant noise impact would occur if implementation of the proposed FPA would:

- *Result in the exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted General Plan, noise ordinance, ALUCPs, or applicable standards of other agencies;*
- *Result in a substantial increase in the existing ambient noise levels; or*
- *Result in increased land use incompatibilities associated with noise.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.5.3 Issue 1: Exposure of Noise-Sensitive Land Uses

Issue 1: Would the proposed FPA result in the exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted General Plan, noise ordinance, ALUCPs, or applicable standards of other agencies?

5.5.3.1 Impact Analysis

According to the General Plan, noise sensitive land uses include, but are not necessarily limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, places of worship, child care facilities, and certain types of passive recreational parks and open space.

A. Construction Noise Impacts

Construction noise estimates are based upon noise levels reported by the Federal Transit Administration, Office of Planning and Environment and the distance to nearby sensitive receptors. Reference noise levels from that document were used to estimate construction noise levels that could occur at nearby sensitive

receptors based on a standard noise attenuation rate of 6 dBA per doubling of distance (line-of-sight method of sound attenuation). The maximum exterior noise limit allowed by SDMC for 7:00 am to 7:00 pm (75 dBA Leq) was used to determine whether construction noise could result in a significant impact on nearby sensitive receptors.

The primary source of noise during construction activities would include heavy machinery used in demolition, grading and clearing, as well as equipment used during building construction and paving. Table 5.5-5 shows typical noise levels associated with heavy construction equipment. As shown, noise levels at construction sites can range from about 81 to 95 dBA at 25 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction.

Table 5.5-5
Typical Construction Equipment Noise Levels

Equipment Onsite	Typical Level (dBA) 25 Feet from the Source	Typical Level (dBA) 50 Feet from the Source	Typical Level (dBA) 100 Feet from the Source
Air Compressor	84	78	64
Backhoe	84	78	64
Bobcat Tractor	84	78	64
Concrete Mixer	85	79	73
Bulldozer	88	82	76
Jack Hammer	95	89	83
Pavement Roller	86	80	74
Street Sweeper	88	82	76
Man Lift	81	75	69
Dump Truck	82	76	70

Source: Noise levels based on FHWA Roadway Construction Noise Model (2006) Users Guide Table 1.
Noise levels based on actual maximum measured noise levels at 50 feet (Lmax).
Noise levels assume a noise attenuation rate of 6 dBA per doubling of distance.

There are currently few existing noise sensitive receptors within the proposed FPA area; however, the proposed FPA would allow construction of approximately 8,275 new residential units. Thus, construction-related noise is likely to occur throughout the proposed FPA area as individual projects are developed. The level of impact would vary depending on the scope and location of specific improvements and surrounding uses. Table 5.5-6 shows typical maximum construction noise levels at various distances from construction activity based on a standard noise attenuation rate of 6 dBA per doubling of distance. The noise level used to estimate the maximum noise level that could occur is based on use of a bulldozer as it is likely to be the equipment type operating closest to the neighboring residences during demolition, grading and site preparation activities. Actual noise levels will fluctuate throughout the day and may periodically exceed 88 dBA depending on the type and location of equipment used and whether multiple pieces of equipment are operating simultaneously in the same area.

Sensitive receptors would include both single and multifamily residences; other sensitive uses, such as daycares or hotels, may be developed. Adjacent construction activities could generate noise levels as high as 88 dBA; however, sustained noise levels would likely not be that high. Still, construction noise could cause a significant temporary increase in noise levels as defined under Appendix G, Section XII, Noise (d) of the CEQA Guidelines. To avoid, minimize or reduce construction-related noise impacts, the San Diego Municipal Code Section 59.5.0404 limits construction noise to an average of 75 dBA over a 12-hour period from 7:00 a.m. to 7:00 p.m. Implementation of the proposed FPA may cause temporary noise impacts during demolition and construction as individual projects are developed. Implementation of Mitigation Measures N-1 through N-5 would help to avoid, reduce, and minimize potential temporary noise impacts that may result from future development projects within the proposed FPA to a level less than significant.

Table 5.5-6
Typical Maximum Construction Noise Levels
at Various Distances from Project Construction

Distance from Construction	Maximum Noise Level at Receptor (dBA)
25 feet	88
50 feet	82
100 feet	76
250 feet	70
500 feet	63
1,000 feet	58

Source: Rincon Consultants, Inc., 2014.

B. Operational Noise Impacts

Noise levels associated with existing and future traffic operation along area roadways were estimated using the Traffic Noise Model (U.S. Department of Transportation, Federal Highway Administration [FHWA], April 2004), and model calculations based in part on traffic data from the project traffic memorandum prepared by Linscott, Law and Greenspan, (dated May, 2014) (Appendix B of this PEIR).

A noise increase greater than 3 dBA is readily perceptible to the average human ear; and thus, is the level that is considered a substantial noise increase. Within the City of San Diego, traffic-related noise impacts are considered significant if project-generated traffic would result in exterior noise levels exceeding 65 dBA or interior levels exceeding 45 dBA for single and multifamily residences. If a project site is currently at or exceeds the these significance thresholds for traffic noise and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

As noted previously, traffic is the primary noise source associated with existing and future activities within the proposed FPA area. As described in Section 5.2 – Transportation/Circulation of this PEIR, the proposed FPA would increase traffic volumes for road segments along Friars Road, Mission Gorge Road, Fairmount

Avenue, Twain Avenue, Vandever Avenue, Alvarado Canyon Road and Waring Road. With implementation of the proposed FPA, these corridors are where predominantly residential uses would be allowed and represent the highest traveled corridors within the proposed FPA area. Because the proposed FPA area is currently comprised primarily of industrial and heavy commercial uses, specific noise receivers were not modeled. Rather, representative locations where sensitive properties are anticipated were identified as receivers for both existing and with project conditions. A total of 23 receiver points were modeled. Table 5.5-7 identifies the receiver locations, which are also depicted on Figure 5.5-2.

Table 5.5-7
Noise Receiver Locations

Receiver	Location
1	South side of Friars Road between Santo Road and Riverdale Avenue
2	Southeast of Friars Road/Riverdale Avenue intersection.
3	North side of Friars Road east of Riverdale Avenue
4	Southwest of Friars Road/ Riverdale Avenue intersection.
5	West side of Mission Gorge Road between Friars Road and Vandever Avenue
6	East side of Mission Gorge Road between Friars Road and Vandever Avenue
7	Northeast of Mission Gorge Road and Vandever Avenue
8	Southeast of Mission Gorge Road and Vandever Avenue
9	Southwest of Mission Gorge Road and Vandever Avenue
10	Northwest of Mission Gorge Road and Twain Avenue
11	Northeast of Mission Gorge Road and Twain Avenue
12	Southeast of Mission Gorge Road and Twain Avenue
13	Southwest of Mission Gorge Road and Twain Avenue
14	West side of Mission Gorge Road mid-block across from Mission Gorge Place
15	East side of Mission Gorge Road south of Mission Gorge Place
16	East side of Mission Gorge Road north of Camino Del Rio North intersection
17	East side of Fairmount Avenue between Vandever Avenue and Twain Avenue
18	East side of Fairmount Avenue south of Twain Avenue intersection
19	East side of Fairmount Avenue between Twain Avenue and Mission Gorge Road
20	East side of Waring Road north of Alvarado Canyon Road
21	West side of Waring Road north of Alvarado Canyon Road
22	North side of Alvarado Canyon Road east of Mission Gorge Road
23	North side of Alvarado Canyon Road west of Waring Road

Source: Rincon Consultants, Inc., 2014.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

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Modeled Receiver Locations

FIGURE
5.5-2

Table 5.5-8
Existing and Projected Peak Hour Noise Levels

Receiver	Existing Peak Hour Leq	2030 Peak Hour Leq	dBA Change	Significant Change
1	72	73	+1	No
2	70	72	+2	No
3	71	72	+1	No
4	72	73	+1	No
5	71	72	+1	No
6	70	71	+1	No
7	70	71	+1	No
8	70	71	+1	No
9	70	72	+2	No
10	70	72	+2	No
11	70	71	+1	No
12	71	72	+1	No
13	72	73	+1	No
14	74	76	+2	No
15	72	73	+1	No
16	74	74	+0	No
17	67	70	+3	**Yes**
18	67	69	+2	No
19	67	69	+2	No
20	66	67	+1	No
21	69	71	+2	No
22	73	74	+1	No
23	73	74	+1	No

Source: Rincon Consultants, Inc., 2014.

Table 5.5-8 shows existing and projected peak hour noise levels for each receiver location. Under existing conditions, peak hour noise levels range from 70-72 dBA along Friars Road and Mission Gorge Road. Noise levels are approximately 67 dBA along the Fairmount Road corridor and 66-69 dBA along Waring Road. In all cases, modeled noise levels within the proposed FPA area exceed the 65 dBA criteria for residential uses, but are within the 75 dBA criteria for industrial and manufacturing uses (see Table 5.5-2).

Traffic volumes and related noise levels throughout the proposed FPA area are projected to increase in 2030 assuming implementation of the proposed FPA. Future year noise levels based on projected peak hour traffic volumes would increase somewhere in the range of 0 to 3 dBA throughout the proposed FPA area. The highest increase would occur along the Fairmount Avenue corridor near the Vandever/Twain Avenue intersections (Receiver 17).

As shown in Table 5.5-8, noise levels within the proposed FPA area currently exceed the 65 dBA exterior criteria for residential uses; thus, existing and future residents would be exposed to noise levels that exceed the City of San Diego standards. This would be a significant impact as defined in Appendix G, Section XII, Noise (a) of the CEQA Guidelines. As noted above, when existing noise levels exceed 65 dBA, project-related noise levels would have to increase by 3 dBA or more for the increase to be considered significant. This is projected to occur within the northern segments of the Fairmount Avenue corridor. Therefore, the increase in noise levels within this area would be considered a substantial permanent increase and a significant impact is identified with the implementation of the proposed FPA per Section XII, Noise (c) of the CEQA Guidelines.

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

5.5.3.2 Significance of Impact

Potential future development would be subject to the SDMC Sections 59.5.0404 and 59.5.0101 et seq., policies of the General Plan, and other applicable noise regulations, and would generally be less than significant. With the implementation of Mitigation Measures N-1 through N-5, impacts related to construction noise would be reduced to a level less than significant. However, build-out under the proposed FPA could potentially expose noise sensitive land uses to future noise levels that exceed land-use noise compatibility thresholds established in the General Plan and levels established in the SDMC. The implementation of Mitigation Measures N-1 and N-6 would reduce operational noise impacts to the extent feasible; however, impacts would not be fully mitigated. Therefore, a significant and unmitigable operational noise impact is identified with the implementation of the proposed FPA.

5.5.3.3 Mitigation Framework

Future development project types that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulation for CPIOZ Type A and can demonstrate that there are no sensitive noise receptors present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework as detailed in Mitigation Measure N-1 and N-6, below.

N-1 **Project Specific Noise Study**. A noise survey shall be conducted to determine construction and operation impacts and identify methods that can be implemented to meet applicable noise standards. The noise survey shall be sufficient to indicate existing and projected noise levels to determine the amount of attenuation needed to reduce potential noise impacts to meet interior noise standards. See the Grantville CPIOZ section – Navajo Community Plan for supplemental design regulations.

N-2 **Construction Equipment**. Electrical power shall be used to run air compressors and similar power tools. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded with temporary noise barriers, such as barriers that meet a sound transmission class (STC) rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

N-3 **Limit Operations Adjacent to Receivers**. Limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to receivers to one at any given time.

N-4 **Neighbor Notification**. As part of applying for construction noise permits, pProvide notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include a telephone number for local residents to call to submit complaints associated with construction noise. (SDMC Section 59.5.0404)

N-5 **Noise Control Plan.** Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements:

- Contractor shall turn off idling equipment.
- Contractor shall perform noisier operation during the times least sensitive to receptors.
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory- recommended mufflers.
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities.

- For all noise-generating construction activities, additional noise attenuation techniques shall be employed as necessary to reduce noise levels. Such techniques shall include, but are not limited to, the use of sound blankets, noise shrouds and temporary sound barriers between construction sites and nearby sensitive receptors as specified in the noise control plan.

Residences would be constructed along existing roadway corridors. These residences are presumed to be high density, multi-story buildings with no exterior uses fronting adjacent roadways. Thus, because the 65 dBA exterior standard is currently exceeded and is projected to be exceeded under 2030 conditions, potentially significant noise impacts associated with project implementation could be avoided by achieving the 45 dBA interior standard for habitable rooms required by the City of San Diego. To achieve this standard, Mitigation Measures N-1, as described above, and N-6 should be considered as specific projects are evaluated during the permitting and environmental review process.

N-6 Where new projects would expose residences to noise exceeding normally acceptable levels, the City of San Diego shall require the ~~consideration~~ use of various sound attenuation techniques as ~~required b~~prescribed in the~~y~~ California Energy Code Title 24 standards. These standards specify construction methods and materials that result in energy efficient structures and up to a 30 dBA reduction in interior noise levels (assuming that windows are closed).

Requirements may include the use of appropriate setbacks and sound attenuating building design, including retrofit of existing structures with sound attenuating building materials where feasible. Such measures may include, but are not limited to dual-paned windows, solid core exterior doors with perimeter weather stripping, air conditioning system so that windows and doors may remain closed and situating exterior doors away from roadways.

In instances where use of these techniques is not feasible, the use of sound barriers (earthen berms, sound walls, or some combination of the two) will be considered. Whenever possible, a combination of elements should be used, including solid fences, walls, and landscaped berms. Determination of appropriate noise attenuation measures will be assessed based on a noise study ~~on a case-by-case basis during a project's individual environmental review~~ pursuant to City of San Diego regulations. This shall be accomplished during the permitting and/or environmental review process~~project's individual environmental review.~~

5.5.3.4 Significance After Mitigation

Conformance with federal, state, and local noise regulations would generally preclude significant noise impacts for the proposed FPA. Such compliance with the above referenced City codes, along with other federal, state, and local regulations, is required of all projects and is not considered to be mitigation. With the implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 through N-5,

construction-related noise impacts associated with future development projects within the proposed FPA would be reduced to a level less than significant.

However, it is possible that for certain land uses, particularly existing sensitive receptors, adherence to noise regulations may not adequately attenuate interior or exterior noise levels generated during build-out of the proposed FPA. Build-out under the proposed FPA could potentially result in the exposure of noise-sensitive land uses to future noise levels that exceed those established in the General Plan or the SDMC. With implementation of Mitigation Measures N-1 and N-6, the significance of these operational noise impacts would be reduced to the extent feasible; however, impacts would not be reduced to a level less than significant. Therefore, operational noise impacts to sensitive receptors would remain significant and unmitigable.

5.5.4 Issue 2: Ambient Noise Level Increase

Issue 2: Would the proposed FPA result in a substantial increase in the existing ambient noise levels?

5.5.4.1 Impact Analysis

According to the CEQA Guidelines, "a substantial increase" is necessary to cause a significant environmental impact. The City's 2011 Significance Determination Thresholds state that a change in the ambient noise level of less than 3 dBA is not perceptible to the general population, and therefore, would not constitute "a substantial increase." A noise increase of 3 dB or greater would be substantial and therefore, result in a potentially significant impact. Table 5.5-2 shows the City's Traffic Noise Significance Thresholds for various land uses for both interior and exterior spaces, along with general indicators of potential significance.

Anticipated ambient noise levels would be driven primarily by traffic noise sources. Increases in traffic noise gradually degrade the ambient noise environment, especially with respect to sensitive receptors. As discussed in Section 5.5.3.1, traffic would be the primary noise source associated with existing and future development within the proposed FPA area. Traffic volumes and related noise levels throughout the area are projected to increase as a result of implementation of the proposed FPA. Future year noise levels based on projected peak hour traffic volumes would increase somewhere in the range of 0 to 3 dBA throughout the proposed FPA area. The ambient noise level is predicted to exceed 3.0 dBA along the Fairmount Avenue corridor near the Vandever/Twain Avenue intersections (Receiver 17).

Noise levels within the proposed FPA area currently exceed the 65 dBA exterior criteria for residential uses; thus, existing and future residents would be exposed to noise levels that exceed the City of San Diego standards. This would be a significant impact as defined in Appendix G, Section XII, Noise (a) of the CEQA Guidelines. As noted above, when existing noise levels exceed 65 dBA, project-related noise levels would have to increase by 3 dBA or more for the increase to be considered significant. This is projected to occur within the northern segments of the Fairmount Avenue corridor. Approximate 65 and 70 dBA noise contours within the study area are shown on Figure 5.5-3.

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

5.5.4.2 Significance of Impact

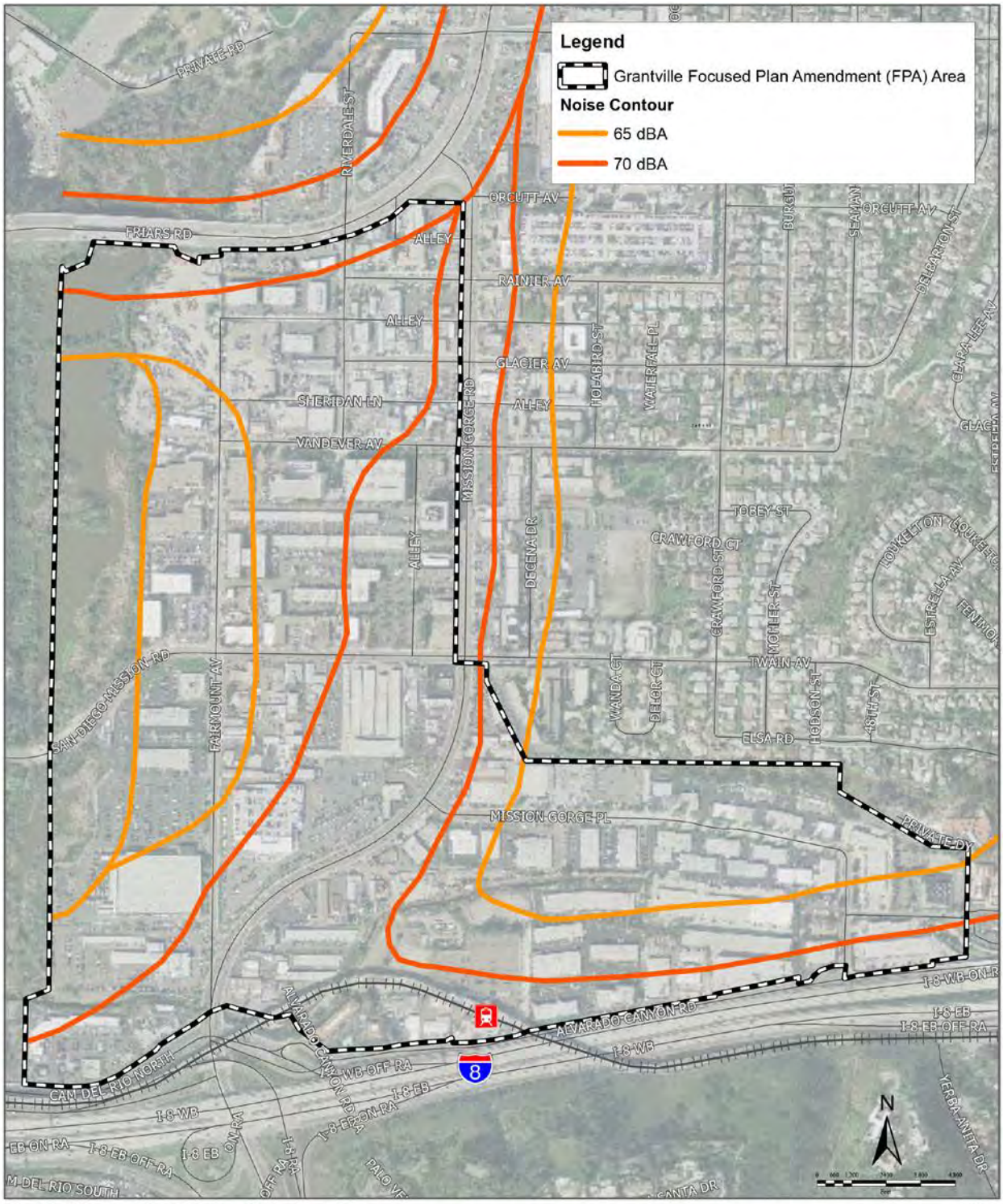
Build-out under the proposed FPA could potentially result in a substantial increase in the existing ambient noise levels in excess of 3.0 dBA within the northern segments of the Fairmount Avenue corridor. Therefore, the increase in noise levels within this area would be considered a substantial permanent increase to ambient noise levels and a significant impact. The implementation of the Mitigation Framework as detailed in Mitigation Measures N-1 and N-6 would reduce operational ambient noise impacts to the extent feasible; however, impacts would not be fully mitigated. Therefore, a significant and immitigable operational noise impact is identified with the implementation of the proposed FPA.

5.5.4.3 Mitigation Framework

Build-out under the proposed FPA could potentially result in a substantial increase in the existing ambient noise levels in excess of 3.0 dBA within the northern segments of the Fairmount Avenue corridor. The General Plan policies provide a framework for supporting future development in existing areas where the urban environment already sustains a higher noise level than less developed areas and would avoid major increases in noise in those less developed areas. These policies, along with adherence to federal, state, and local noise regulations (including the Noise Element of the General Plan and Section 59.5.0101 et seq. of the SDMC), and the implementation of the Mitigation Framework as detailed in Mitigation Measure N-1 and N-6, described above, serve to preclude or reduce significant impacts to a degree, but cannot mitigate impacts within the northern segments of the Fairmont Avenue corridor to a level less than significant. Therefore, impacts associated with increased ambient noise are significant at the program level.

5.5.4.4 Significance After Mitigation

As discussed above, compliance with federal, state, and local noise regulations would assist in reducing significant ambient noise impacts associated with the proposed FPA. However, increases in ambient noise level would still exceed City thresholds in some parts of the proposed FPA area and would not be mitigated below a level of significance. Therefore, noise impacts would remain significant and unavoidable.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 August 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Noise Contour Map

FIGURE
5.5-3

5.5.5 Conclusion

Future development activities associated with the implementation of the proposed FPA have the potential to result in significant temporary construction noise impacts. However, compliance with the SDMC and implementation of Mitigation Measures N-1 through N-5 would reduce construction noise impacts to a level less than significant.

Future development activities that may result from implementation of the proposed FPA have the potential to result in the exposure of noise-sensitive land uses to future operational noise levels which exceed applicable standards; a substantial increase in existing ambient noise levels; or increased land use incompatibilities associated with noise. Compliance with the federal, state, and local noise regulations, as well as the implementation of the Mitigation Framework as outlined in Mitigation Measures N-1 and N-6 would help to avoid, minimize, and reduce potential project-specific impacts; however, increases in ambient noise levels would still exceed City thresholds in some parts of the proposed FPA area and would not be mitigated to below a level of significance. Therefore, implementation of the proposed FPA would result in significant and unmitigable impacts related to operational noise.

5.6 Biological Resources

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with biological resources. The information contained in this section is summarized from the *Grantville Focused Plan Amendment Biological Opportunities and Constraints Analysis* (dated May 20, 2014)(Appendix E of this PEIR) prepared by Rocks Biological Consulting and the *Programmatic Water Quality Technical Report* (dated May 14, 2014) (Appendix G of this PEIR) prepared by Fuscoe Engineering. These documents are provided on the attached CD of Technical Appendices found on the back cover.

Since the development of Appendix E and Appendix G, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix E and Appendix G, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.6.1 Existing Conditions

The proposed FPA area primarily consists of Urban/Developed habitat (approximately 343 acres). Still, native habitat is present in the proposed FPA area, a majority of which is located in or near the San Diego River. The following describes the existing biological resources located within the proposed FPA area.

5.6.1.1 Botanical Resources-Flora

A. Vegetation Communities

A total of 11 vegetation communities/land uses as described by Holland (1986) and/or Oberbauer (1996) have been delineated within the proposed FPA area and are depicted in Figure 5.6-1. Vegetation communities or land uses present within the proposed FPA area include Diegan Coastal Sage Scrub, Disturbed Land, Freshwater Marsh, Giant Reed, Jurisdictional Streambed, Non-Native Grassland, Open Water, Ornamental, Riparian Forest, Southern Riparian Scrub, and Urban/Developed. The following are brief descriptions of the 11 vegetation communities. A detailed description is contained in the Biological Opportunities and Constraints Analysis (Appendix E of this PEIR). It should be noted that the vegetation communities and land uses described below should be considered general in nature, and vegetation community sub-types such as maritime succulent scrub or southern maritime chaparral may occur within larger vegetation communities within the FPA area.

Sensitive Upland Communities

Diegan Coastal Sage Scrub (Holland Code 32500; Tier II habitat type) occurs in very small pockets at the periphery of the proposed FPA area, comprising a total of 9.0 acres. This habitat is comprised primarily of low, soft-woody subshrubs of approximately one meter (3 ft) in height, many of which are facultatively drought-deciduous. This association is typically found on dry sites within the proposed FPA area, such as steep, south-facing slopes or clay-rich soils that are slow to release stored water. Dominant shrub species in this vegetation type vary, depending on local site factors and levels of disturbance. Within the proposed

FPA area, dominant species include California sagebrush (Artemisia californica), California Buckwheat (Eriogonum fasciculatum ssp. fasciculatum), and Laurel Sumac (Malosma laurina). Other, less frequent, constituents of this community include Deerweed (Lotus scoparius), Broom Baccharis (Baccharis sarothroides), Goldenbush (Isocoma menziesii var. meziesii), and Lemonadeberry (Rhus integrifolia).

Non-native Grassland (Holland Code 42200, Tier IIIB habitat type) occupies approximately 0.3 acres in the southern end of the proposed FPA area adjacent to the Fairmount Avenue/Interstate 8 interchange. Non-native Grassland generally occurs on fine-textured loam or clay soils which are moist or even waterlogged during the winter rainy season and very dry during the summer and fall. It is characterized by a dense to sparse cover of annual grasses, often with native and nonnative annual forbs (Holland 1986). This habitat is a disturbance-related community most often found in old fields or openings in native scrub habitats. This association has replaced Native Grassland and Coastal Sage Scrub at many localities throughout southern California.

Wetland Communities

Riparian Forest (Holland Code 61000) occupies approximately 26.0 acres of the proposed FPA area, primarily along the San Diego River. This habitat is an open or closed canopy forest that is generally greater than 6 m (20 ft) high and occupies relatively broad drainages and floodplains supporting perennially wet streams. Within the proposed FPA area, this community is dominated by mature individuals of winter deciduous trees, including Fremont's cottonwood (Populus fremontii var. fremontii) and several species of willows (Salix gooddingii, S. laevigata, S. lasiolepis), and often has a dense understory of shrubby willows, mulefat (Baccharis salicifolia), and mugwort (Artemisia douglasiana). The dominant species require moist, bare mineral soil for germination and establishment (Holland 1986). This is provided after floodwaters recede, leading to uniform-aged stands.

Southern Riparian Scrub (Holland Code 63300) occupies approximately 1.9 acres of the proposed FPA area. This habitat varies from a dense, broad-leafed, winter-deciduous association dominated by several species of willow to an herbaceous scrub dominated by mulefat. Typical willow species include black willow (Salix gooddingii), arroyo willow (Salix lasiolepis), and sandbar willow (Salix exigua) and there is often a large component of Mulefat and/or invasive species such as Giant Reed (Arundo donax) and Tamarisk (Tamarix spp.). Understory vegetation is typically lacking or composed of nonnative, weedy species. Southern Riparian Scrub may represent a successional stage leading to Riparian Woodland or Forest or they may be stable depending on the frequency and intensity of disturbance.

Freshwater Marsh (Holland Code 52400) occupies approximately 1.4 acres occur in the proposed FPA area. Freshwater Marsh occurs in wetlands that are permanently flooded or saturated with fresh water (Holland 1986). The Freshwater Marsh within the proposed FPA area is dominated by perennial, emergent monocots such as rushes (Schoenoplectus spp.) and cattails (Typha spp.) and areas of unvegetated, open water. In several ponds near the Friars Road Bridge, the ponds are infested with the invasive species Uruguay Marsh Purslane (Ludwigia hexapetala) (J. Rocks personal observation 2004).

Open Water (Oberbauer Code 13140) occupies approximately 11.0 acres within the proposed FPA area. There are large ponds within the San Diego River that reduce water flow velocity of the river and contain water throughout the year. The Open Water areas often support Freshwater Marsh or Southern Riparian Scrub along its margins and in some instances is being invaded by the weedy Uruguay Marsh Purslane.

Non-Native Vegetation/Land Uses

Disturbed Land (Oberbauer Code 11300; Tier IV habitat type) occupies approximately 1.0 acre within the proposed FPA area. Disturbed land is any land on which the native vegetation has been significantly altered by agriculture, construction, or other land-clearing activities, and the species composition and site conditions are not characteristic of the disturbed phase of a plant association (e.g., disturbed Diegan Coastal Sage Scrub). Disturbed land is typically found in vacant lots, roadsides, construction staging areas or abandoned fields, and is dominated by non-native annual species and perennial broadleaf species. Within the proposed FPA area, most of the Disturbed Land is associated with the sand and gravel mine activities along the San Diego River. These areas have been cleared of vegetation and in some areas weedy, ruderal vegetation is re-colonizing the area.

Giant Reed (Arundo donax) occupies approximately 1.6 acres of the proposed FPA area, along a small tributary to the San Diego River. Giant Reed is a robust, perennial grass that can grow from 9 to 30 feet in height and spreads rapidly from horizontal rootstocks in the soil. Giant Reed is a CDFW-listed noxious weed and is listed by the California Invasive Plant Council (Cal-IPC) as a List A-1 "Most Invasive Wildland Pest Plant." Giant Reed is a documented aggressive invader that displaces natives and disrupts natural habitats. This species has invaded many areas along the San Diego River and Alvarado Creek, degrading native wetland habitats such as Southern Riparian Scrub and Riparian Forest.

Ornamental (Oberbauer Code 11000) vegetation occupies 8.0 acres of the proposed FPA area and typically consists of non-native landscape and/or garden plantings that have been planted in association with buildings, roads, or other development. Because of the abundance and patchy distribution of ornamental plantings within the proposed FPA area, the classification "Urban/Developed" also includes some ornamental plantings.

Urban/Developed (Oberbauer Code 12000; Tier IV habitat types) areas occupy the majority of the proposed FPA area (approximately 343 acres). These areas include commercial, industrial, office/professional, recreational, and residential development and contain plantings of ornamental vegetation as landscaping. Urban/Developed areas support no native vegetation because of the presence of buildings or roads.

B. Plants

The proposed FPA area supports limited native floral diversity throughout much of the area because the majority of the proposed FPA area is Urban/Developed. The Diegan Coastal Sage Scrub within the proposed FPA area is mostly of moderate to low species diversity because many of these patches have been disturbed or degraded to some degree or are adjacent to Disturbed Land or Urban/Developed areas. The areas of highest native species diversity occur within and adjacent to the San Diego River. The

Riparian and Freshwater Marsh habitats that support a moderate to high level of native species diversity and the Diegan Coastal Sage Scrub that buffers the San Diego River from adjacent Urban/Developed areas are of higher quality than isolated patches that occur away from the River.

C. Rare, Threatened, Endangered, Narrow Endemic and/or Sensitive Species or MSCP Covered Species

Regulatory authority over sensitive species listed as threatened or endangered is issued under the Federal Endangered Species Act (FESA) and/or the California Endangered Species Act (CESA). The City of San Diego has several regulations governing biological resources within the City of San Diego. These include the Multiple Species Conservation Program (MSCP) Subarea Plan, the Environmentally Sensitive Lands regulations, and the Biology Guidelines.

Tables 5.6-1 and 5.6-2 summarize the Narrow Endemic Species and Non-Narrow Endemic Sensitive flora that are expected or have potential to occur within the proposed FPA area. Narrow endemic species are those with a very restricted habitat and occur only in the San Diego region. Specific protections apply to Narrow Endemic species pursuant to the MSCP.

TABLE 5.6-1: Potential for Narrow Endemic Plant Species to Occur Within the Proposed FPA

Species	Potential to Occur/Comments
San Diego Thornmint	Low. Minimal native habitat occurs outside the San Diego River MHPA areas; this species occurs on clay lenses in open, upland areas.
San Diego Ambrosia	Low to Moderate. Species occurs in disturbed areas, seasonally dry drainages and floodplains and within chaparral, coastal sage scrub and grasslands. Would likely be known if present; species occurs along the San Diego River within Mission Trails Regional Park (CNDDB, 2004).
Variegated Dudleya	Low. Habitat is typically openings in coastal sage scrub or grasslands. There is very little suitable habitat for this species within the proposed FPA area.

Source: Rocks Biological Consulting, 2014.

TABLE 5.6-2: Potential for Non-Narrow Endemic Sensitive Plant Species to Occur Within the Proposed FPA

Common Name	Habitat	ESA Status	CESA Status	CA Rare Plant Rank	MSCP Status	FPA Area Potential
California adolphia	Chprl, CoScr	None	None	2B.1	Not Covered	Potentially Present
Orcutt's Brodiaea	Chrpl, CmWld, Medws, VFGrs, VnPla/clay	None	None	1B.1	Covered	Potentially Present
San Diego Jewel Flower	Chprl, CoScr	None	SR	None	Covered	Potentially Present
Wart-stemmed Ceanothus	Chprl	None	None	2B.2	Covered	Very Low Potential to Occur Due to Lack of Suitable Habitat

TABLE 5.6-2 (cont'd)
Potential for Non-Narrow Endemic Sensitive Plant Species to Occur Within the Proposed FPA

Common Name	Habitat	ESA Status	CESA Status	CA Rare Plant Rank	MSCP Status	FPA Area Potential
Summer Holly	Chprl	None	None	1B.2	Not Covered	Very Low Potential to Occur Due to Lack of Suitable Habitat
Western Dichondra	Chprl, CoScr	None	None	4.2	Not Covered	Potentially Present
Palmer's Ericameria	RpWld	None	None	1B.1	Covered	Low Potential to Occur Due to Lack of Suitable Habitat
Coast Barrel Cactus	CoScr, Chprl	None	None	2B.1	Covered	Expected
Graceful Tarplant	VFGrs	None	None	4.2	Not Covered	Low Potential to Occur Due to Lack of Suitable Habitat
San Diego Marsh Elder	RpWld, intermittent creeks, streambeds	None	None	2B.2	Not Covered	Potentially Present
Southwestern Spiny Rush	RpMarsh, Medws (Alkali)	None	None	4.2	Not Covered	Potentially Present
Small-flowered Microseris	VFGrs/clay	None	None	4.2	Not Covered	Potentially Present
Willowy Monardella	RpScr, sandy floodplains	FE	SE	1B.1	Covered	Low Potential to Occur Due to Lack of Suitable Habitat
San Diego Goldenstar	Chprl, CoScr (openings)	None	None	1B.1	Covered	Potentially Present
Torrey Pines	Chprl, CCFrs	None	None	1B.2	Covered	Not Present as Native
Nuttall's Scrub Oak	Chprl	None	None	1B.1	Not Covered	Low Potential to Occur Due to Lack of Suitable Habitat
Engelmann Oak	Chprl, CmWld, RpWld, VFGrs	None	None	4.2	Not Covered	Low Potential to Occur Lack of Suitable Habitat
San Diego Viguiera	CoScr	None	None	4.2	Not Covered	Potentially Present

Notes: **Habitat Codes:** CCFrs = Closed-cone Conifer Forest, Chprl = Chaparral, CoScr = Coastal Scrub, CmWld = Cismontane Woodland, Medws = Meadows, RpWld = Riparian Woodland, VFGrs = Valley and Foothill Grassland, VnPlas = Vernal Pools
FE = Federally Endangered, **FT** = Federally Threatened, **SE** = California ESA, **SR** = State Rare, Endangered.
California Rare Plant Rank: List 1B – Plants rare, threatened, or endangered in California or Elsewhere; List 2A – Plants presumed extirpated in California, but more common elsewhere; List 2B – Plants rare, threatened or endangered in California, but more common elsewhere; List 3 – Plants about which more information is needed; List 4 – Plants of limited distribution – a watch list.

- 0.1 – Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- 0.2 – Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
- 0.3 – Not very threatened in California (<20% of occurrences threatened/low degree and immediacy of threat or no current threats known.

Source: Rocks Biological Consulting, 2014.

5.6.1.3 Zoological Resources – Fauna

A. Wildlife Habitats

Wildlife habitat refers to the land and water that provide the food, shelter and opportunities for reproduction that wild animals need to survive. The following section summarizes the characteristics of the vegetation communities within the proposed FPA area and lists some of the common or sensitive wildlife species that often use these habitats.

Diegan Coastal Sage Scrub

Within the proposed FPA area, this low-growing, drought-tolerant vegetation community is likely to support several locally common species of birds, mammals, reptiles, and butterflies as well as sensitive wildlife species. The Diegan Coastal Sage Scrub within the proposed FPA area generally occurs only in small patches and is not anticipated to support a diverse collection of wildlife species. The exception is the small area in the southeast portion of the proposed FPA area that is connected to a larger area of undeveloped habitat. This area has the potential to support the federally listed threatened and MSCP covered Coastal California Gnatcatcher, a sage scrub obligate species. Please refer to the Biological Opportunities and Constraints Analysis (Appendix E of this PEIR) for a detailed discussion on specific species found in the Diegan Coastal Sage Scrub Habitat.

Riparian Habitat

Riparian habitat refers to the trees, other vegetation and physical features normally found on the banks and floodplains of rivers, streams, and other bodies of freshwater. Riparian habitat occupies a small amount of total land area, but supports a disproportionately large number of fish and wildlife species. Several locally common wildlife species are expected to use the riparian areas along the San Diego River. Please refer to the Biological Opportunities and Constraints Analysis (Appendix E of this PEIR) for a detailed discussion on specific species found in the Riparian Habitat.

The Riparian Habitat within the proposed FPA area has been disturbed and reduced in size from its historic extent because of residential, commercial, and industrial development and alteration of its hydrologic regime. However, extensive, high quality Riparian Habitat exists along many stretches of the San Diego River within the proposed FPA area. Within the City of San Diego, Riparian Habitat of the river extends from Mission Bay Park near the Pacific Ocean to Mission Trails Regional Park and provides a regional habitat linkage between these two City parks.

Freshwater Marsh

Freshwater Marshes are among the most productive wildlife habitats. They provide food, cover, and water for more than 160 species of birds, and numerous mammals, reptiles, and amphibians. Many species rely on Freshwater Marsh for their entire life cycle. Many of the species listed as occurring in riparian habitats are likely to use Freshwater Marshes in some capacity for foraging, cover, or breeding. There are large areas of Freshwater Marsh and open water in the San Diego River as a result of the alteration of landform and hydrologic regime that has created large ponds within the river's channel.

Non-Native Vegetation

The Non-native Grassland and Disturbed Land within the proposed FPA area provide some biological value to native wildlife species, but the value is far below that of native vegetation communities. Non-native Grassland provides foraging opportunities for raptors such as red-tailed hawk, red-shouldered hawk, and owl species because it is an open, low growing community that typically supports an abundance of small mammals such as deer mice, gophers, and rats. Locally common species of birds and butterflies will also use Non-native Grassland and Disturbed Land for foraging and cover. These areas tend to be limited in the number and abundance of different species they can support because of the limited number of native plant species and also tend to be fragmented to some degree and not connected to large native habitat areas.

The abundance of Urban/Developed areas within the proposed FPA area has eliminated habitat connectivity and fragmented habitats to a great degree. This results in a reduction in the diversity and abundance of wildlife species in the proposed FPA area. However, the San Diego River riparian habitats are still areas of relatively high species diversity and abundance, and provide a regional wildlife corridor for travel by species from Mission Trails Regional Park to Mission Bay Park. These habitats and linkages are crucial for wildlife species survival and reproduction within the proposed FPA area and surrounding region.

B. Rare, Threatened, Endangered, Narrow Endemic and/or Sensitive Species or MSCP Covered Species

Table 5.6-3 summarizes sensitive fauna with a potential to occur within the proposed FPA area.

TABLE 5.6-3
Sensitive Species Expected or With a Potential
to Occur in the Proposed FPA Area

Common Name	Habitat	ESA Status	CESA Status	MSCP Status	FPA Area
Quino Checkerspot Butterfly	Open Grassland and openings of Coastal Scrub and Chaparral that support Dotseed Plantain	FE	SA	Not Covered	No potential to occur due to lack of suitable habitat, historical occurrences in proposed FPA area have been extirpated. Not reported since 1960.
Hermes Copper	Openings in Chaparral, associated with the larval host plant Spiny Redberry, adults feed on nectar from California Buckwheat	FSC	SA	Not Covered	Low potential to occur due to lack of suitable habitat. Known from Mission Trails Regional Park.
Western Spadefoot Toad	Sandy or gravelly soil in grasslands, Coastal Scrub, open Chaparral, and pine-oak woodlands. Openings with shallow, temporary pools are optimal.	FSC	CSC Protected	Not Covered	Potentially Present
Southwestern Pond Turtle	Quiet, permanent stream pools and ponds	FSC	CSC	Covered	Expected
San Diego Horned Lizard	Friable soils in Chaparral, Coastal Scrub, Oak Woodlands, and old dirt roads with native ant species	FSC	CSC Protected	Covered	Potentially Present

TABLE 5.6-3 (cont'd)
Sensitive Species Expected or With a Potential to Occur in the Proposed FPA Area

Common Name	Habitat	ESA Status	CESA Status	MSCP Status	FPA Area
Coronado Shink	Various habitats including grasslands, Coastal Scrub, and woodlands	FSC	CSC	Not Covered	Expected
Orangethroat Whiptail	Coastal Scrub, Chaparral, sandy floodplains with patches of brush and rock	FSC	CSC Protected	Covered	Expected
Silvery Legless Lizard	Leaf litter and sandy substrates	FSC	CSC	Not Covered	Potentially Present
Coastal Western Whiptail	Coastal Scrub, Chaparral, and grasslands	FSCC	SA	Not Covered	Potentially Present
Coast Patchnosed Snake	Chaparral and Coastal Scrub; may require mammal burrows or woodrat nests for overwintering	FSC	CSC Protected	Not Covered	Potentially Present
San Diego Ringneck Snake	Chaparral, forest and grasslands	None	SA	Not Covered	Potentially Present
Coastal Rosy Boa	Rocky outcrops within Chaparral and Coastal Scrub	FSC	SA	Not Covered	Low potential to occur due to lack of suitable habitat
Two-striped Garter Snake	Semi-permanent and permanent bodies of water in variety of habitats. Requires riparian border	None	CSC Protected	Not Covered	Expected
Northern Red Diamondback Rattlesnake	Rocky outcrops and areas of heavy brush or rugged terrain on slopes of chaparral, sage scrub, and desert scrub, usually below 400 feet	FSC	CSC	Not Covered	Expected
Turkey Vulture	Open Habitats with large trees	FSC	CSC	Not Covered	Observed in proposed FPA area
Golden Eagle	Nests in cliffs or trees in mountainous or hilly terrain	None	CSC Fully Protected	Covered	Very low potential to occur due to lack of suitable habitat
American Peregrine Falcon	Coastal areas	FE	CE	Covered	Low potential to occur due to lack of suitable habitat
Sharp-shinned Hawk	Mixed woodlands near open areas, riparian habitats	None	CSC	Not Covered	Potentially Present
Cooper's Hawk	Oak, riparian deciduous or other woodland habitats, often near water	None	CSC	Covered	Observed in proposed FPA area
Northern Harrier	Marsh and open terrain	None	CSC	Covered	Expected
Ferruginous Hawk	Dry, open terrain	FSC	CSC	Covered	Potentially Present
Osprey	Near lagoons, bays, and lakes	None	CSC	Not Covered	Potentially Present
Loggerhead Shrike	Grassland or open habitats with bare ground and spar shrub and/or tree cover	FSC	CSC	Not Covered	Potentially Present
Tricolored Blackbird	Near ponds	None	CSC	Covered	Expected
Least Bell's Vireo	Riparian woodlands, typically nests in immature Salix spp. (willow) stands	FE	SA SE	Covered	Potentially Present
Coastal California Horned Lark	Grasslands, disturbed land and open areas with sparse, low vegetation	None	CSC	Not Covered	Expected
Burrowing Owl	Grasslands, generally those occupied by other burrowing animals	None	CSC	Covered	Not Expected to occur due to lack of suitable habitat

TABLE 5.6-3 (cont'd)
Sensitive Species Expected or With a Potential to Occur in the Proposed FPA Area

Common Name	Habitat	ESA Status	CESA Status	MSCP Status	FPA Area
Coastal California Gnatcatcher	Coastal Scrub	FT	CSC	Covered	Potentially Present
Western Bluebird	Open woodlands, farmlands and orchards	None	None	Covered	Potentially Present
Yellow Warbler	Riparian woodlands with Salix spp. (willow) component	None	CSC	Not Covered	Expected
Yellow-breasted Chat	Riparian woodland/scrub with dense undergrowth	None	CSC	Not Covered	Expected
Coastal Cactus Wren	Coastal Scrub with patches of Cylindropuntia prolifera (coastal cholla) and other cacti	None	CSC	Covered	Not Expected to occur due to lack of suitable habitat
Southern California Rufous-crowned Sparrow	Rocky hillsides with sparse, low Coastal Scrub or Chaparral, sometimes mixed with grassland	FSC	CSC	Covered	Expected
Grasshoper Sparrow	Grasslands and pastures	None	SA	Not Covered	Potentially Present
Southern Willow Flycatcher	Summer resident; riparian woodland with Salix spp. (willow) component	FE	CSC	Covered	Low-moderate potential to occur
American Badger	Open grasslands near native habitat	None	None	Covered	Not Expected to occur due to lack of habitat
San Diego Black-tailed Jackrabbit	Open Chaparral, Coastal Scrub and grasslands	FSC	CSC	Not Covered	Expected
Dulzura California Pocket Mouse	Coastal Scrub with fine sandy soils	FSC	CSC	Not Covered	Expected
Northwestern San Diego Pocket Mouse	Coastal Scrub	FSC	CSC	Not Covered	Expected
San Diego Desert Woodrat	Chaparral, often in rock outcrop areas	FSC	CSC	Not Covered	Expected
Yuma Myotis	Primarily woodlands and forests; forages over water	FSC	CSC	Not Covered	Potentially Present
Long-eared Myotis	Multiple habitats; forages in oak/coniferous forests	FSC	None	Not Covered	Potentially Present
Fringed Myotis	Multiple habitats; forage in coniferous forests	FSC	None	Not Covered	Potentially Present
Long-legged Myotis	Multiple habitats; forages in coniferous forests	FSC	None	Not Covered	Potentially Present
Small-footed Myotis	Multiple habitats; strongly associated with openings in woodlands, brush and riparian habitats	FSC	None	Not Covered	Potentially Present
Spotted Bat	High rocky cliffs; forages in riparian and edge habitats	FSC	CSC	Not Covered	Potentially Present
Pallid Bat	Multiple habitats; forages in open forest and grasslands	None	CSC	Not Covered	Potentially Present
Pocketed Free-tailed Bat	Cliffs	None	CSC	Not Covered	Potentially Present. Known from San Diego River in Mission Gorge (CNDDB, 2004)
Big Free-tailed Bat	Cliffs; strong association with rugged, rocky canyons	None	CSC	Not Covered	Potentially Present

Source: Rocks Biological Consulting, 2014.

C. Sensitive Biological Resources

Sensitive biological resources are defined as species of rare and/or endangered status or species that are depleted or declining according to the USFWS, CDFW, California Native Plant Society (CNPS) and/or the City of San Diego. Sensitive habitats are those considered rare within the region either because of development encroachment or are naturally limited in distribution and/or support rare, threatened, or endangered species. The proposed FPA area supports sensitive habitats including wetland habitats, Riparian and Freshwater Marsh and the upland communities of Diegan Coastal Sage Scrub and Non-native Grassland. Several sensitive species have the potential to occur in the proposed FPA area, including the federally listed endangered Least Bell's Vireo and CDFW sensitive Cooper's Hawk. Riparian habitats have extremely high wildlife value because of the availability of water and cover and the abundance of forage in the form of vegetation and other animals.

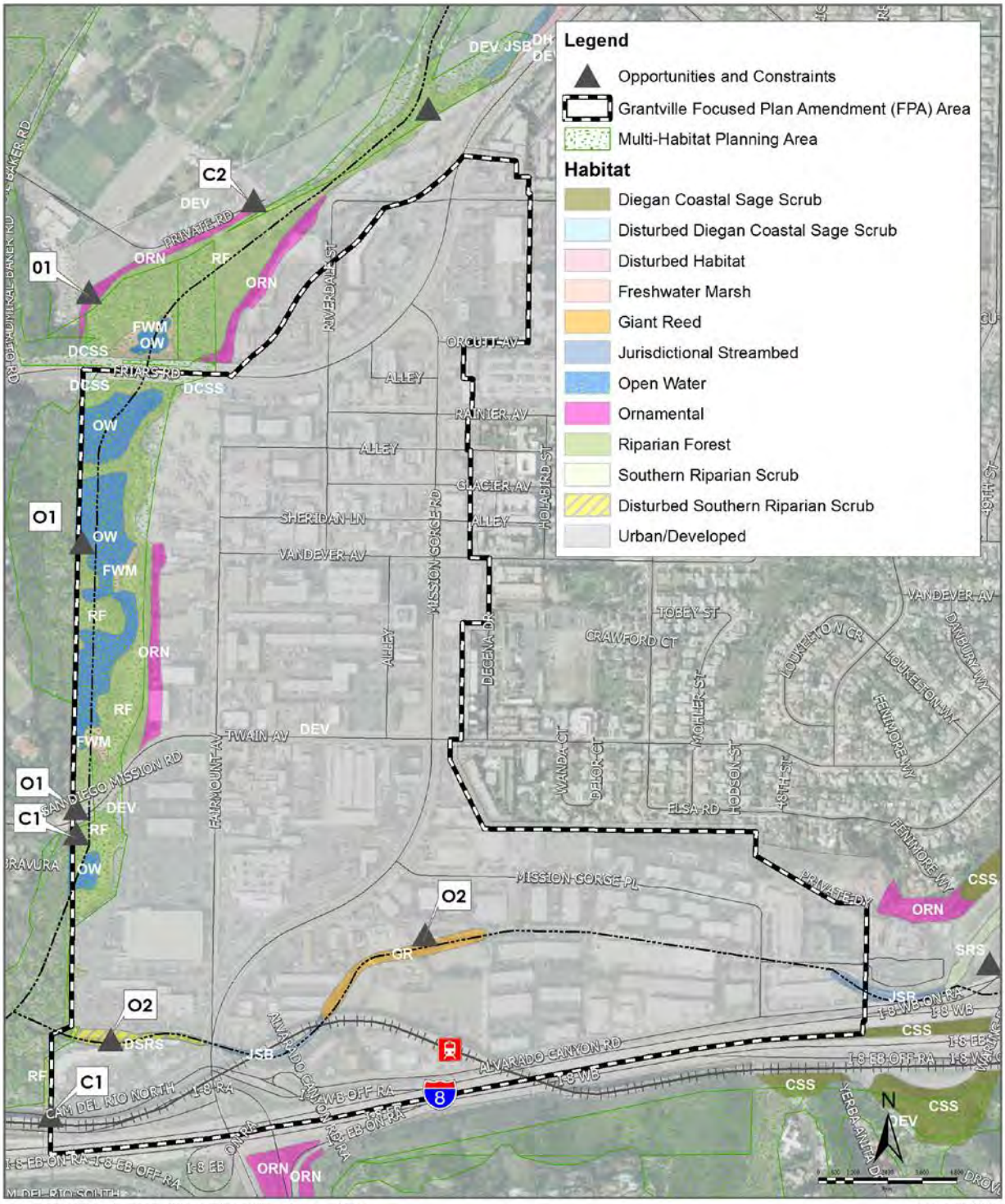
Several sensitive species also inhabit Diegan Coastal Sage Scrub and have the potential to occur in the proposed FPA area, including the threatened Coastal California Gnatcatcher and CDFW sensitive Rufous-crowned Sparrow. Both Riparian and Diegan Coastal Sage Scrub habitats are naturally limited in distribution and have been substantially reduced in Southern California by development and other disturbance activities. Tables 5.6-1 through 5.6-3 provide a listing of sensitive species and their potential for occurrence in the proposed FPA area.

D. Wildlife Corridors

A wildlife corridor, or linkage, is often defined as a landscape feature that allows animal movement between two patches of habitat or between habitat and other important habitat features such as water.

The MSCP preserve was designed to maintain connections between core habitat areas, including linkages between coastal lagoons and more inland habitats, and linkages between different watersheds. In addition to allowing for demographic and genetic exchange by all species between core preserve areas, linkages are intended to allow larger predators (e.g., mountain lions, coyotes, and bobcats) to move among conserved habitat blocks and reach coastal habitats.

The proposed FPA area is located within and adjacent to the City's MSCP Multi-Habitat Planning Area (MHPA). The MSCP identifies the San Diego River corridor as a Core Biological Habitat Linkage between the Pacific Ocean and Mission Trails Regional Park. The San Diego River corridor is important because it provides a linkage between habitats that allows wildlife to disperse to larger areas of native habitat in the region and help increase or maintain biological diversity. The MHPA boundary within the proposed FPA area is depicted on Figure 5.6-1.



SOURCE: 2014, SanGIS, 2014; City of San Diego, 2014 August 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Biological Resources with Opportunities and Constraints

FIGURE 5.6-1

5.6.1.4 Regulatory Setting

The proposed FPA is subject to the biological regulations of the City of San Diego as well as state and federal agencies. The following describes the regulations applicable to the proposed FPA.

A. City of San Diego

The City of San Diego has several regulations governing biological resources, including the MSCP, the Environmentally Sensitive Lands regulations, and the Biology Guidelines.

The MSCP is a comprehensive habitat conservation planning program for southwestern San Diego County. The program targets areas for preservation (labeled MHPA in the City of San Diego) and requires implementation of the City's MSCP implementing regulations in exchange for local agency 'take' authority over covered federal and state-listed species. The City's MSCP Subarea Plan, Biology Guidelines, and Environmentally Sensitive Lands Regulations are the implementing regulations of the City's MSCP pursuant to its implementing agreement with the USFWS and CDFW.

The MSCP identifies the MHPA, or preserve of the MSCP, and is intended to link all core biological areas into a regional wildlife preserve. Any development project in the City that proposes impacts to native habitat must provide mitigation for such impacts pursuant to the Biology Guidelines. For projects located outside the MHPA, habitat must either be acquired as mitigation or monies must be paid into a habitat acquisition fund. For developments located wholly within the MHPA, a 25% development area is allowed for each parcel, and the remainder of the site is preserved as mitigation. For developments located partially within the MHPA, all lands outside the MHPA may be developed, subject to the applicable land use and development regulations; if lands outside the MHPA total less than 25% of the parcel, development within the MHPA is allowed in order to achieve 25% development of the parcel. Any development within the MHPA must be located in the least biologically sensitive portion of the site.

Within the City, wetlands are regulated under the Municipal Code's Environmentally Sensitive Lands Regulations and Biology Guidelines. According to the City's Municipal Code, wetlands are defined as areas characterized by naturally occurring hydrophytic, or wetland vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools. The City also takes jurisdiction over areas that have hydric soils or wetland hydrology but lack naturally occurring wetland vegetation due to human activities or because of catastrophic or recurring natural events, such as flooding or fire.

Pursuant to the Biology Guidelines, impacts to wetlands should be avoided and minimized to the maximum extent practicable, and are allowed only under three specific circumstances:

- Essential public projects;
- Economic viability projects where complete avoidance of wetland impacts would deprive the landowner of economically viable use of the property; and,
- Biologically superior projects, where the impacted wetland is low quality and mitigation will result in a biologically superior result.

The City also requires that a wetland buffer adequate to protect the functions and values of the wetlands be maintained. The City's Biology Guidelines [Section II (A)(1)(b) provide guidance for maintenance of wetland buffers outside the coastal zone and requires that "a wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland. Section 320.4(b)(2) of the U.S. Army Corps of Engineers (ACOE) General Regulatory Policies (33 CFR 320-330) list criteria for consideration when evaluating wetland functions and values."

In addition, any development adjacent to the MHPA must comply with the MHPA land use adjacency guidelines, which are summarized in Section 5.1, Land Use.

B. California Department of Fish and Wildlife

Wetlands within the State of California are also subject to California Department of Fish and Wildlife (CDFW) jurisdiction pursuant to Section 1600 of the California Fish and Game Code. State regulations define the CDFW jurisdiction for the purpose of administering the provisions of Section 1600 of the Fish and Game Code as within the bed, bank, and channel of a stream, including intermittent streams.

The State also regulates impacts on rare plant and animal species through the California Endangered Species Act (CESA). State listed species with the potential to occur within the proposed FPA area are listed in Tables 5.6-1 through 5.6-3. However, the City of San Diego has taken authority over many of the areas' State-listed species through the MSCP. For projects that are deemed consistent with all MSCP implementing regulations, including the species specific requirements set forth in Appendix A (i.e., Table 3-5) of the City's MSCP Subarea Plan, impacts to MSCP-covered listed species are generally allowed through permits issued by the City. Any impacts to non-covered state-listed species would require a permit from CDFW.

C. U.S. Fish and Wildlife Service

The Federal government also regulates impacts on rare plant and animal species through the Endangered Species Act. Federally listed species with the potential to occur in the proposed FPA area are listed in Tables 5.6-1 through 5.6-3. However, the City of San Diego has been given take authority for many of the areas' federally-listed species through the MSCP, contingent on the City's implementation of the MSCP, including the species-specific measures identified in Appendix A (i.e., Table 3-5) of the City's MSCP Subarea Plan. Impacts to MSCP-covered listed species outside the MHPA are generally allowed through permits issued by the City; however, in certain cases, take may not be authorized, or conditions for coverage may require that impacts be avoided, even outside of the MHPA. Species-specific conditions required for coverage are included in Table 3-5 of the MSCP Plan, Appendix A of the City's Subarea Plan. Take of a MSCP covered species within the MHPA is not allowed, and certain wetland species such as Least Bell's Vireo and Fairy Shrimp would still require federal permitting. Any impacts to non-covered listed species, and certain wetland-associated species, would require a Section 7 or Section 10 Consultation before a permit may be issued by the U.S. Fish and Wildlife Service (USFWS).

D. U.S. Army Corps of Engineers

Waters of the U.S., including wetlands, are subject to U.S. Army Corps of Engineers (ACOE) jurisdiction pursuant to Section 404 of the federal Clean Water Act (CWA). Non-wetland Waters of the U.S. are defined by the ACOE based on the presence of an ordinary high water mark (OHWM) as defined at 33 CFR 328.3(e).

In addition to wetlands, ACOE has jurisdiction over other Waters of the U.S. that include non-wetland areas such as unvegetated channels that exhibit a clear OHWM and are considered to be, or are directly connected to, a navigable waterway. Impacts on ACOE jurisdictional wetlands or other Waters of the U.S. would require a Section 404 permit.

E. San Diego Regional Water Quality Control Board

Dredging or filling Waters of the United States (e.g., creek, drainage with or without water flow, wetland) requires a Section 401 Water Quality Certification, pursuant to Section 401 of the CWA. Applications for Section 401 Certification are reviewed and processed in San Diego County by the San Diego Regional Water Quality Control Board (RWQCB).

Pursuant to the California Porter-Cologne Water Quality Act, projects that propose discharge (e.g. fill or development) are regulated under the waste discharge requirements of the act. The applicant must file with the RWQCB for such discharge.

5.6.2 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact to biological resources would occur if the proposed FPA would 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 CDFW or USFWS;*
- *A substantial 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 Code or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;*
- *A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filing, hydrological interruption, or other means;*
- *Interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites;*
- *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, either within the MSCP plan area or in the surrounding region;*
- *Introduction of a land use within an area adjacent to the MHPA that would result in adverse edge effects;*

- *A conflict with any local policies or ordinances protecting biological resources; and/or,*
- *An introduction of invasive species of plants into a natural open space.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.6.3 Issue 1: Sensitive Flora or Fauna

Issue 1: Would the proposed FPA 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 CDFW or USFWS?

5.6.3.1 Impact Analysis

A. Direct Impacts

Future development projects within the proposed FPA have the potential to result in temporary and/or direct impacts to sensitive flora and fauna species within the proposed FPA area. Temporary impacts could result from construction activities that occur in close proximity to potential nesting habitat of sensitive species. Impacts could include adversely affecting species during the breeding season, causing them to abandon nests which increases the potential for nest predation or neglect and reduces fecundity (potential reproductive capacity) of the species.

Future development projects within the proposed FPA also have the potential to result in permanent direct impacts through destruction of sensitive plants and animals, including sensitive birds and their nests and eggs, and of aestivation sites for sensitive amphibians occurring within these habitat areas. It is not possible at this time to determine whether significant impacts to sensitive species would occur from future development activities; however, direct impacts on non-MSCP covered federal and state listed sensitive species or narrow endemics outside the MHPA would be considered significant.

With the implementation of future development projects allowed by the proposed FPA, impacts to covered or non-covered listed species or to narrow endemic species within the MHPA would be considered significant. However, implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would reduce potential impacts to a level less than significant.

B. Indirect Impacts

The San Diego River and adjacent upland habitats serve as a regional habitat linkage or wildlife corridor throughout its length within the proposed FPA area. Permanent indirect impacts to adjacent native habitats, collectively called "edge effects", could occur from an increase in the amount of edge habitat, night illumination of vegetation communities, and an increase in human intrusion into the corridor. As

described in the City's Biology Guidelines, the edge between native plant communities and human-modified areas are considered to be adverse to many native species. Many wildlife species decrease along the edge of habitat due to detrimental conditions, such as increased parasitism, increased nest predation, and increased competition for nesting areas (City of San Diego, 2012). An increase in the amount of edge habitat can also increase opportunities for invasive species to spread and colonize new areas and degrade the quality of native habitat for plant and wildlife species. The introduction of additional lighting into the wildlife corridor could cause physiological and behavioral changes in wildlife species and disproportionately increase opportunities for predation on vulnerable species. Increases in human disturbance to the corridor could occur from an increase in human intrusion in areas adjacent to any future development. Human disturbance could include trampling, harassing of wildlife, introduction of domestic animals such as cats and dogs, and an increase in litter. Domestic cats and dogs are known to prey on reptiles, passerine birds, and small mammals. Therefore, the implementation of future development allowed by the proposed FPA has the potential to result in significant indirect impacts to the sensitive species. However, with implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, impacts would be reduced to a level less than significant.

5.6.2.2 Significance of Impact

Direct impacts to candidate, sensitive, or special status species could potentially occur as a result of future development activities. Direct impacts on non-MSCP covered federal and state listed sensitive species or narrow endemics outside the MHPA would be considered significant. In addition, potential indirect impacts anticipated include an increase in the amount of edge habitat, night illumination of vegetation communities, and an increase in human intrusion into the wildlife corridor. These indirect impacts have the potential to adversely affect any candidate, sensitive, or special status species present in the proposed FPA area through habitat modification, which would be considered significant. However, at this time it is not possible to determine the significance of impacts to sensitive species that would occur from future development projects within the proposed FPA area. Any potential impacts to sensitive species resulting from future development activities would need to be evaluated on a project-specific basis. However, with the implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, impacts that may result from future development projects would be reduced to a level less than significant.

5.6.3.3 Mitigation Framework

Implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and associated mitigation elements identified in Section 5.6.9, would ensure that any potential direct and indirect impacts to candidate, sensitive, or special status species that may result from future development projects would be reduced to a level less than significant.

5.6.3.4 Significance After Mitigation

With implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, potential direct and indirect impacts to candidate, sensitive, or special status species would be reduced to a level less than significant.

5.6.4 Issue 2 and Issue 3: Sensitive Habitats

Issue 2: Would the proposed FPA result in a substantial 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 Code or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

Issue 3: Would the proposed FPA result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filing, hydrological interruption, or other means?

5.6.4.1 Impact Analysis

A. Direct Impacts

The proposed FPA area includes significant areas of Riparian (26.0 acres) and Freshwater Marsh Habitat (1.4 acres) along the San Diego River, as well as sensitive upland habitats. Existing habitats within the proposed FPA area and potential significance of impacts on such habitats with the implementation of future development projects allowed by the proposed FPA are identified in Table 5.6-4 below.

Table 5.6-4: Summary of Potential Impacts to Vegetation Communities

Vegetation Community (MSCP Tier Habitat Type)	Potential Impacts	Biological Significance Determination
Riparian Habitat (Tier I Wetland)	Potential direct and indirect impacts from future development	Significant
Freshwater Marsh (Tier I Wetland)	Potential direct and indirect impacts from future development	Significant
Diegan Coastal Sage Scrub (Tier II)	Potential direct impacts from future development	Significant
Non-Native Grassland (Tier IIIB)	Potential direct impacts from future development	Significant
Disturbed Land (Tier IV)	Potential direct impacts from future development	Not Significant
Ornamental	Potential direct impacts from future development	Not Significant
Urban/Developed (Tier IV)	Potential direct impacts from future development	Not Significant

Source: Rocks Biological Consulting, 2014.

Figure 5.6-1 depicts the existing vegetation communities within the proposed FPA. The area labeled 'C1' within the proposed FPA on Figure 5.6-1 consists primarily of Urban/Developed land. However, also located within this area is Riparian and Freshwater Marsh habitat associated with the San Diego River that is within the MHPA. Before specific future development plans could be implemented that may affect these sensitive vegetation communities, a site-specific biological resources report, including a wetland delineation, would be required to be processed and reviewed by City of San Diego. In addition, wetland

impacts would be subject to the jurisdiction of the ACOE, CDFW, RWQCB, and the City. Direct impacts to Riparian or Freshwater habitat and wetland buffers would be considered significant. However, with the implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, impacts would be reduced to a level less than significant.

The area labeled 'C2' within the proposed FPA on Figure 5.6-1 consists of Urban/Developed land. However, this parcel also includes Riparian Habitat, some of which is within the MHPA. All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. For future projects that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulations for CPIOZ-Type A, and can demonstrate that no biological resources are present, the project can be processed ministerially and would not be subject to further environmental review under CEQA. Future development that does not comply with CPIOZ-Type A shall be subject to review in accordance with CPIOZ-Type B, and shall implement the Mitigation Framework detailed in Mitigation Measures BR-1 through BR-5~~6~~, below. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance. In addition, wetland impacts would be subject to the jurisdiction of the ACOE, CDFW, RWQCB, and the City. Direct impacts on Riparian Habitat or encroachment into the MHPA beyond that allowed by City of San Diego regulations would be considered significant. However, with the implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 potential impacts would be reduced to a level less than significant.

In the southern portion of the proposed FPA area near Alvarado Canyon and Adobe Falls Road, there are small patches of Diegan Coastal Sage Scrub immediately south of Interstate 8 and adjacent to Waring Road, both of which are designated as MHPA land. Also, there is a portion of Alvarado Creek and an unnamed tributary within the area labeled 'C3' on Figure 5.6-1. Alvarado Creek conveys water west, roughly parallel to Interstate 8 from Lake Murray and into the proposed FPA area. The streambed is sparsely vegetated at the east end of the proposed FPA area and has been directed underground into a culvert near commercial businesses and parking lots. The creek then "daylights" into a concrete lined channel with dense patches of invasive Giant Reed before flowing under Mission Gorge Road and into the San Diego River. Impacts to the streambed or wetland vegetation may be subject to the jurisdiction of the ACOE, CDFW, RWQCB, and the City. Before specific future development plans could be implemented that may affect Alvarado Creek, its tributary, or the Diegan Coastal Sage Scrub, a site-specific biological resources report, including a wetland delineation, would be required. Direct impacts on jurisdictional drainages, wetland vegetation, Diegan Coastal Sage Scrub or encroachment into the MHPA beyond that allowed by City regulations would be considered significant. However, implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would reduce the potential impacts to a level less than significant.

Other vegetation communities or land uses that occur within the proposed FPA area include landscape plantings of horticultural specimens along roads and interchanges and Disturbed Land that lacks vegetation or supports only non-native vegetation. Impacts on these vegetation communities/land uses is not be considered a significant impact.

B. Indirect Impacts

There is the potential for the following indirect impacts to occur on sensitive vegetation communities from future development activities within the proposed FPA:

- Noise, dust and associated construction activity could affect animals during construction;
- The introduction of invasive exotic plant species into native habitats from disturbance or removal of native vegetation communities;
- Excessive irrigation of landscaping adjacent to native vegetation communities could alter the localized natural moisture regime and increase weediness and susceptibility of plants to disease, pests, and fungus;
- Increased urban runoff and pollution into native vegetation communities through use of herbicides, pesticides, and fertilizers; and,
- Increase of human disturbance of native vegetation through trampling and introduction of non-native, weedy species.

These potential indirect impacts would be considered significant. However, with the implementation of Mitigation Measures BR-1 through BR-5~~6~~, the Land Use Adjacency Guidelines, as outlined in Section 5.1, and the associated mitigation elements identified in Section 5.6.9 would reduce the potential impacts to a level less than significant.

5.6.4.2 Significance of Impact

Future development projects that would result from the proposed FPA would potentially have direct and indirect impacts on Tier I-III vegetation communities, as well as other sensitive vegetation communities identified by the USFWS and/or CDFW, and wetlands. As such, impacts to these vegetation communities is considered to be a significant impact. Any potential impacts to sensitive vegetation communities resulting from future development activities would need to be evaluated on a project-specific basis. However, with the implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 impacts would be reduced to a level less than significant.

5.6.4.3 Mitigation Framework

Implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would ensure that any potential direct and indirect impacts to Tier I-III vegetation communities, sensitive vegetation communities identified by USFWS and/or CDFW, or wetlands that may result from future development projects would be reduced to a level less than significant.

5.6.4.4 Significance After Mitigation

With implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, potential direct and indirect impacts to Tier I-III vegetation communities, sensitive vegetation communities identified by USFWS and/or CDFW, or wetlands would be reduced to a level less than significant.

5.6.5 Issue 4: Wildlife Corridors

Issue 4: Would the proposed FPA substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

5.6.5.1 Impact Analysis

A. Direct Impacts

The San Diego River and associated Riparian and upland vegetation communities within the valley and on the slopes provides a regional wildlife corridor that links Mission Trails Regional Park with Mission Bay Park and Pacific Ocean. Impacts to sensitive vegetation communities in the proposed FPA area may also be considered an impact on the regional wildlife corridor. However, consistency with City of San Diego MSCP regulations would also generally avoid impacts to wildlife corridors. In addition, the implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would reduce potential direct impacts to regional wildlife corridors to a level less than significant.

B. Indirect Impacts

Permanent indirect impacts to wildlife corridors could occur from an increase in the amount of night illumination of vegetation communities and an increase in human intrusion into the corridor. The introduction of additional lighting into the wildlife corridor could cause physiological and behavioral changes in wildlife species and disproportionately increase opportunities for predation on vulnerable species. Increases in human disturbance to the corridor could occur from an increase in human intrusion in areas adjacent to future development. Human disturbance could include trampling, harassing of wildlife, introduction of domestic animals such as cats and dogs, and an increase in litter. Domestic cats and dogs are known to prey on reptiles, passerine birds, and small mammals. These potential indirect impacts on the wildlife corridor in the MHPA would be considered significant and shall be avoided through conformance with the MHPA Land Use Adjacency Guidelines of the MSCP Subarea Plan with the implementation of future development projects within the proposed FPA area. In addition, implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would reduce potential indirect impacts to regional wildlife corridors to a level less than significant.

5.6.5.2 Significance of Impact

Future development projects that would be allowed by the proposed FPA would potentially have direct and indirect impacts to the regional wildlife corridor that links Mission Trails Regional Park with Mission Bay Park. Impacts to sensitive vegetation communities resulting from an increase in the amount of night illumination and an increase in human intrusion would also be a significant impact to the regional wildlife corridor. Any potential impacts to regional wildlife corridors resulting from future development activities would need to be evaluated on a project-specific basis. Potential direct and indirect impacts on the wildlife corridor in the MHPA would be avoided through mandatory conformance with the MHPA Land Use Adjacency Guidelines of the MSCP Subarea Plan. In addition, with the implementation of the Mitigation

Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, impacts would be reduced to a level less than significant.

5.6.5.3 Mitigation Framework

Implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would ensure that any potential impacts to regional wildlife corridors that may result from future development projects within the proposed FPA would be reduced to a level less than significant.

5.6.5.4 Significance After Mitigation

With the implementation of Mitigation Measures BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9, potential direct and indirect impacts to regional wildlife corridors would remain less than significant.

5.6.6 Issue 5: Habitat Conservation Plan

Issue 5: Would the proposed FPA 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, either within the MSCP plan area or in the surrounding region?

5.6.6.1 Impact Analysis

Implementation of the proposed FPA has the potential to result in direct and indirect impacts to MHPA lands. All direct and indirect impacts associated with the City of San Diego's MSCP Subarea Plan/MHPA are discussed further in Section 5.1 Land Use of this PEIR.

5.6.6.2 Significance of Impact

Implementation of the proposed FPA has the potential to result in direct and indirect impacts to MHPA lands. All direct and indirect impacts associated with the City of San Diego's MSCP Subarea Plan/MHPA are discussed further in Section 5.1 Land Use of this PEIR.

5.6.6.3 Mitigation Framework

The Mitigation Framework as detailed in ~~Mitigation Measures LU-1 through LU-3~~ Mitigation Measure LU-1 address direct and indirect impacts to MHPA lands.

5.6.6.4 Significance After Mitigation

With implementation of the Mitigation Framework as detailed in ~~Mitigation Measures LU-1 through LU-3~~Mitigation Measure LU-1 provided in Section 5.1 Land Use of this PEIR, potential direct and indirect impacts to the City's MSCP Subarea Plan/MHPA associated with future development projects would remain less than significant.

5.6.7 Issue 6: Invasive Species

Issue 6: Would the proposed FPA result in the introduction of invasive species of plants into a natural open space?

5.6.7.1 Impact Analysis

A. Direct Impacts

The proposed FPA is not anticipated to result in any direct impacts to vegetation communities through the introduction of invasive plant species into a natural open space. However, mandatory compliance with the City's MSCP Subarea Plan MHPA Land Use Adjacency Guidelines would ensure that future development projects within the proposed FPA area would not result in direct impacts to natural open space through the introduction of invasive species into a natural open space.

B. Indirect Impacts

The proposed FPA has the potential to indirectly impact vegetation communities through the introduction of invasive plant species into a natural open space area. Permanent indirect impacts could occur from an increase in the amount of edge habitat, which has the potential to increase opportunities for invasive plant species to spread and colonize new areas and degrade the quality of habitat for plant and wildlife species. In addition, the introduction of invasive exotic plant species into native habitats could result from disturbance or removal of native vegetation communities. These potential indirect impacts would be considered significant. However, implementation of the Mitigation Framework as detailed in ~~Mitigation Measures LU-1 through LU-3~~Mitigation Measure LU-1 and the associated mitigation elements identified in Section 5.6.9 would reduce the potential indirect impacts resulting from the introduction of invasive species for future development projects within the proposed FPA to a level less than significant.

5.6.7.2 Significance of Impact

Direct impacts associated with the introduction of invasive plant species are not anticipated as a result of project implementation. However, mandatory compliance with the City's MSCP Subarea Plan MHPA Land Use Adjacency Guidelines would ensure that future development projects within the proposed FPA area would not result in direct impacts to natural open space through the introduction of invasive species into a natural open space. Potential indirect impacts of future development may result from an increase in edge habitat, which has the potential to increase opportunities for invasive plant species to spread and colonize new areas and degrade the quality of habitat for plant and wildlife species. As such, these potential indirect impacts would be considered significant. Any potential impacts associated with invasive species introduction resulting from future development activities would need to be evaluated on a project-specific basis. However, implementation of the Mitigation Framework as detailed in ~~Mitigation Measures LU-1 through LU-3~~Mitigation Measure LU-1, and the associated mitigation elements identified in Section 5.6.9 would reduce the potential indirect impacts resulting from the introduction of invasive species for future development projects within the proposed FPA to a level less than significant.

5.6.7.3 Mitigation Framework

Mandatory compliance with the City's MSCP Subarea Plan MHPA Land Use Adjacency Guidelines would ensure that future development projects within the proposed FPA area would not result in direct impacts to natural open space through the introduction of invasive species into a natural open space. In addition, implementation of the Mitigation Framework as detailed in ~~Mitigation Measures LU-1 through LU-3~~Mitigation Measure LU-1 and the associated mitigation elements identified in Section 5.6.9 would ensure that any potential indirect impacts to natural open space associated with the introduction of invasive plant species that may result from future development projects would be reduced to a less than significant level.

5.6.7.4 Significance After Mitigation

With implementation of the Mitigation Framework as detailed in ~~Mitigation Measures LU-1 through LU-3~~Mitigation Measure LU-1 and the associated mitigation elements identified in Section 5.6.9, potential indirect impacts to natural open space through the introduction of invasive plant species associated with future development projects within the proposed FPA would be reduced to a level less than significant.

5.6.8 Issue 7

Issue 7: Would the proposed FPA result in discharging into receiving waters with Environmentally Sensitive Lands or water bodies?

5.6.8.1 Impact Analysis

The following is a brief discussion of water quality impacts to receiving waters as they pertain to biological resources. A more detailed discussion of impacts to receiving waters as a result of the proposed FPA is further discussed in Section 5.8 - Water Quality of this PEIR.

Wetland communities adjacent to the FPA area include Riparian Forest, Southern Riparian Scrub, Freshwater Marsh, and Open Water, the majority of which are located within the San Diego River corridor. In addition, sensitive uplands habitat are also located adjacent to the proposed FPA area. These habitats support a number of sensitive biological resources, including rare, threatened or endangered plant and wildlife species. As such, discharges of pollutants into the San Diego River would be considered a significant impact to the biological resources located within these sensitive habitats. Future development projects associated with the implementation of the proposed FPA would have the potential to change pollutant discharges. The volume of runoff within the proposed FPA area is not expected to increase and will probably decrease through the required implementation of Low Impact Development (LID) design. However, future development projects within the proposed FPA area would be required to comply with the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual, and implement a number of BMPs to reduce the discharge of pollutants into receiving waters. BMPs that may be implemented on a project-specific basis include a variety of Site Design (LID), Source Control, and Treatment Control BMPs. The specific BMPs and how they are applied to reduce discharges for particular pollutants are further detailed in Section 5.8, Water Quality of this PEIR. Therefore, with the adherence to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; the

implementation of BMPs; and, compliance with California BMP Handbook, potential impacts related to discharge into receiving waters with Environmentally Sensitive Lands or water bodies would be reduced to a level less than significant.

5.6.8.2 Significance of Impact

With the adherence to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; the implementation of BMPs; and, compliance with California BMP Handbook, potential impacts related to discharge into receiving waters with Environmentally Sensitive Lands or water bodies associated with the construction of future development projects within the proposed FPA area would be reduced to a level less than significant.

5.6.8.3 Mitigation Framework

Adherence to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; the implementation of BMPs; and, compliance with California BMP Handbook would reduce impacts to water bodies to a level of significance. No mitigation measures are required.

5.6.8.4 Significance After Mitigation

No mitigation is required; therefore there would be no significance after mitigation.

5.6.9 Mitigation Framework

In addition to biological constraints, the proposed FPA area includes several opportunities for habitat restoration, creation, conservation, or preservation of sensitive vegetation communities. These opportunities could serve as mitigation measures to reduce potential future development project impacts within the proposed FPA area to a level less than significant. The following are future development project mitigation requirements as well as a discussion of potential biological restoration and enhancement opportunities.

5.6.9.1 Proposed FPA Mitigation Requirements

The following measures would provide mitigation for impacts on biological resources within the proposed FPA area. All future development activities will be required to be in compliance with City of San Diego MSCP Subarea Plan and its implementing regulations.

Mitigation is required for impacts that are considered significant under the City of San Diego's Biology Guidelines (2012) and the City of San Diego's CEQA Significance Determination Thresholds (2011). All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. For future projects that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulations for CPIOZ-Type A, and can demonstrate that no biological resources are present, the project can be processed ministerially and would not be subject to further environmental review under CEQA. Future development that does not comply with CPIOZ-Type A shall be subject to review in accordance with CPIOZ-Type B, and shall

implement the Mitigation Framework summarized ~~detailed~~ in Mitigation Measures BR-1 through BR-~~5~~6, below. Chapter 11 (Mitigation Monitoring and Reporting Program) details the implementation of the Mitigation Framework. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance.

BR-1 To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the FPA area, all subsequent projects within CPIOZ Type B areas shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). ~~Prior to any project impacts occurring within areas under the jurisdiction of federal, state, or local biological resource regulatory agencies, the project applicant for the specific work shall obtain any and all applicable resource agency permits which may include, but are not limited to, Clean Water Act 404 and 401 permits and California Department of Fish and Wildlife Streambed Alteration Agreements.~~

BR-2 **Mitigation for Impacts to Sensitive Upland Habitats.** Future projects implemented in accordance with the FPA resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines (see Table 5.6-5) MSCP Subarea Plan. ~~Significant impacts to City Tier I-III habitats shall be mitigated as shown in Table 5.1-6 of Section 5.1, Land Use of this PEIR.~~

BR-3 **Mitigation for Short-term Impacts to Sensitive Species from Project Construction.** Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo, and the cactus wren are further detailed in LU-3 and BR-4.

Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the FPA are included in Sections 5.1.6 (Land Use) and 5.6.3 (Biological Resources). Please refer to Mitigation Framework BR-1 through BR-5 and LU-1 (MHPA Land Use Adjacency Guidelines). ~~Any significant wetland/waters of the U.S. resource impacts to the San Diego River or other such features located in the planning area identified during the site specific environmental review of a specific project shall be mitigated within the immediate area of the impact action where feasible.~~

BR-4 To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the FPA shall be required to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats. ~~Where potential impacts to non-MSCP covered federal and/or state listed sensitive~~

~~species and/or narrow endemic species may occur as a result of future development actions, coordination with responsible listing agencies (USFWS and/or CDFW) shall commence as early as practicable and in conjunction with, or prior to, the CEQA process for actions that may affect these species. Specific actions necessary to protect these sensitive species shall be determined on a case-by-case basis.~~

BR-5 **Mitigation for Migratory Wildlife.** Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the FPA area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in BR-1 during the subsequent development review process. The Biology Report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor. ~~Project actions resulting in impacts to nesting migratory birds (as defined under the Migratory Bird Treaty Act [MBTA]) shall incorporate seasonal timing constraints for any wetland habitat clearing or shall require work corridor surveys for nesting birds. Where active nests are identified, these shall be avoided if practical, and if necessary, a MBTA Special Purpose Permit (50 CFR §21.27) shall be completed before removal of active nests of MBTA-covered species.~~

~~**BR-6** Impacts on nesting birds shall be avoided in compliance with California Fish and Game Code (§3503) under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs.~~

5.6.9.2 Biological Mitigation Opportunities and the San Diego River Park Master Plan

The San Diego River Park Master Plan is a comprehensive planning document that was developed by a multi-disciplinary team including, but not limited to, the San Diego River Park Conservancy, San Diego River Alliance, San Diego River Park Foundation, San Diego River Coalition, Civitas Inc., and the City of San Diego. The primary goal of the plan is to create a river-long park, stretching from the San Diego River headwaters near Julian to the Pacific Ocean at Ocean Beach. The river and its adjacent land uses are currently disconnected and the plan would help reverse this condition and "restore the symbiotic relationship between the river and nearby land uses."

As specific future development actions are implemented within the proposed FPA area and impacts on biological resources occur, mitigation within the San Diego River Park and adjacent habitats will likely be necessary. There appears to be several opportunities to mitigate future development impacts within the proposed FPA area that would be consistent with the goals of the San Diego River Park. Potential mitigation opportunities within the proposed FPA area are presented below and are identified as 'O1-O2' with 'O' denoting a potential 'Opportunity.'

The San Diego River Park Master Plan has identified areas along the River at 'O1' (Figure 5.6-1) that are recommended for addition to the adjacent open space areas. These parcels abut the river and are currently Urban/Developed. An opportunity may be available along the river in these areas to mitigate impacts from future development projects through creation of wetland habitats and wetland buffer habitats within these Urban/Developed areas.

Another potential opportunity for mitigation of future development impacts and identified as a "Key Site" in the San Diego River Park Master Plan is at the confluence of Alvarado Creek and the San Diego River at 'O2' (Figure 5.6-1). Mitigation opportunities include daylighting, or uncovering, and dechannelizing Alvarado Creek, as well as removing large areas of Giant Reed and planting native riparian vegetation to enhance existing Riparian Habitat. These areas are not within the MHPA, but provide significant biological opportunities and, if restored, may be candidates for inclusion in the MHPA.

Along the entire portion of the San Diego River within the proposed FPA area, opportunities for mitigation exist, such as removal of Ornamental vegetation along development parcels that abut the river. Several of the Open Water areas of the river are infested with the invasive Uruguay Marsh Purslane, which the removal of could serve as mitigation.

5.6.9.3 Protection and Notice Element

Assurance that mitigation areas will be adequately protected from future development shall be provided through 1) the dedication of fee title for the mitigation land to the City; or 2) the establishment of a conservation easement relinquishing development rights to a conservation entity; or 3) a recorded covenant of easement against the title of the property for the remainder area, with the USFWS and CDFW named as third party beneficiaries, where a future project has utilized all of its development area potential as allowed under the OF-1-1 zone.

5.6.9.4 Management Element

Assurance that the mitigation areas will be adequately managed and monitored in a manner consistent with Section 1.5 Preserve Management, of the City's MSCP Subarea Plan shall be provided through identification of 1) how the objectives of the City's MSCP Preserve Management recommendations will be met for the area, as well as any additional management recommendations resulting from site-specific information; and 2) the responsible entity and funding source for the long-term maintenance and management of the area.

5.6.10 Conclusion

Future development activities that would be allowed with the implementation of the proposed FPA have the potential to result in direct and indirect impacts to biological resources. However, compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations and the implementation of ~~Mitigation Measures LU-1 through LU-3~~ Mitigation Measure LU-1, BR-1 through BR-5~~6~~ and the associated mitigation elements identified in Section 5.6.9 would reduce potential impacts to a level less than significant.

5.7 Hydrology

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with hydrology. Information contained in this section is summarized from the *Hydrology Study for Grantville Focused Plan Amendment EIR* (dated May 14, 2014) (Appendix F of this PEIR) and the *Programmatic Water Quality Technical Report (WQTR) for Grantville Focused Plan Amendment EIR* (dated May 14, 2014) (Appendix G of this PEIR), both prepared by Fuscoe Engineering. These documents are provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix F and Appendix G, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix F and Appendix G, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.7.1 Existing Conditions

5.7.1.1 Hydrologic Setting

The proposed FPA area includes approximately 400 acres of developed land located within the San Diego Regional Water Quality Control Board (RWQCB) Basin. The Basin contains 11 major drainage basins, which encompass most of San Diego County, and parts of southwestern Riverside County and southwestern Orange County. The San Diego Hydrologic Region is over three million acres in size and generally drains westerly toward the Pacific Ocean. As shown on Figure 5.7-1, the proposed FPA area is located in the Mission San Diego Hydrologic Subarea (Hydrologic Basin Unit Number 907.11), within the Lower San Diego Hydrologic Area, and the San Diego River Hydrologic Unit (HU). With a land area of approximately 440 square miles, the San Diego River HU is the second largest HU in San Diego County. It also has the highest population of the County's watersheds (approximately 475,000) and contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee and several unincorporated communities.

The central and northerly portions of the proposed FPA area generally slope to the west toward the San Diego River, while the southerly portion of the proposed FPA area slopes towards Alvarado Creek, which flows through this portion of the proposed FPA area. Land within the proposed FPA area drains into either Alvarado Creek, or directly to the San Diego River. The existing network of streets and storm drain systems discharges runoff from the proposed FPA area to these watercourses at several outlet points.

Alvarado Creek runs from east to west through the southerly portion of FPA area, joining with the San Diego River near the southwesterly corner of the proposed FPA area. Alvarado Creek extends approximately four miles east of the proposed FPA area, and its watershed includes portions of the Cities of San Diego and La Mesa, as well as Lake Murray. The watershed is predominantly developed, with the exception of portions of Mission Trails Regional Park. The FPA portions of the watershed drain to Alvarado Creek through a combination of storm drain systems and surface flow. Alvarado Creek also accepts surface flow through the proposed FPA area and from areas to the north and south of the proposed FPA area. As it flows through the proposed FPA area, portions of Alvarado Creek are conveyed in a lined channel, an underground culvert, and a semi-natural channel. The San Diego River makes up the northwesterly and

westerly boundaries of the proposed FPA area. The northerly and westerly portions of the proposed FPA area drain to the San Diego River through surface flow and storm drain systems. These storm drain systems also convey runoff from the adjacent residential area to the east through the proposed FPA area to the San Diego River. Upon exiting the proposed FPA area, site flows continue west for approximately 9 miles in the San Diego River. Flows pass through developed portions of Mission Valley in a semi natural channel before reaching areas of hardened channel slopes and discharging into the Pacific Ocean at the Dog Beach outlet.

5.7.1.2 Flooding

Based on review of Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) described in Appendix I, the low-lying areas near the San Diego River and Alvarado Creek are within 100- and 500-year floodplains. Based on this review and site reconnaissance, the potential for significant flooding for parcels located near the San Diego River and Alvarado Creek is high. Portions of the proposed FPA area are located within a Special Flood Hazard Area (SFHA) and therefore, are subject to flooding during storm events, as identified by the ~~Federal Emergency Management Agency (~~FEMA~~)~~ flood hazard maps. This is attributable to the fact that portions of the proposed FPA area are located within the floodplain; the growth within the San Diego River Watershed (SDRW) has increased; and, there is existing inadequate drainage/flooding infrastructure. As depicted on Figure 5.7-2, the southeastern portion of proposed FPA area is located within the 100-year floodplain of Alvarado Creek. Portions of the western side of the proposed FPA area are within the 100-year floodplain and floodway of the San Diego River.

The primary flood control measures serving the SDRW include El Capitan Reservoir, San Vicente Reservoir, and the channelized sections of the San Diego River at the estuary, Mission Valley, and Lakeside. The reservoirs have historically functioned effectively in reducing peak flood flows along the lower San Diego River. For example, during the 1980 flood, El Capitan Reservoir absorbed the entire peak flow, while San Vicente Reservoir reduced the peak flow by approximately 50 percent. However, the existing levels of protection afforded by the flood control channel sections may be inadequate under a 100-year flood in the intensively urbanized Mission Valley area. The flood-carrying capacity of the channel at this section may have become even less adequate under burned conditions after wildfires such as the 2003 Cedar Fire (San Diego River Watershed Workgroup, 2004).

5.7.1.3 Groundwater

Groundwater is defined as subsurface water that occurs beneath the water table in soils and geologic formations that are fully saturated. Groundwater bearing formations sufficiently permeable to transmit and yield significant quantities of water are called aquifers. Further, a groundwater basin is defined as a hydrogeologic unit containing one large aquifer or several connected and interrelated aquifers. All major drainage basins in the San Diego Region contain groundwater basins.

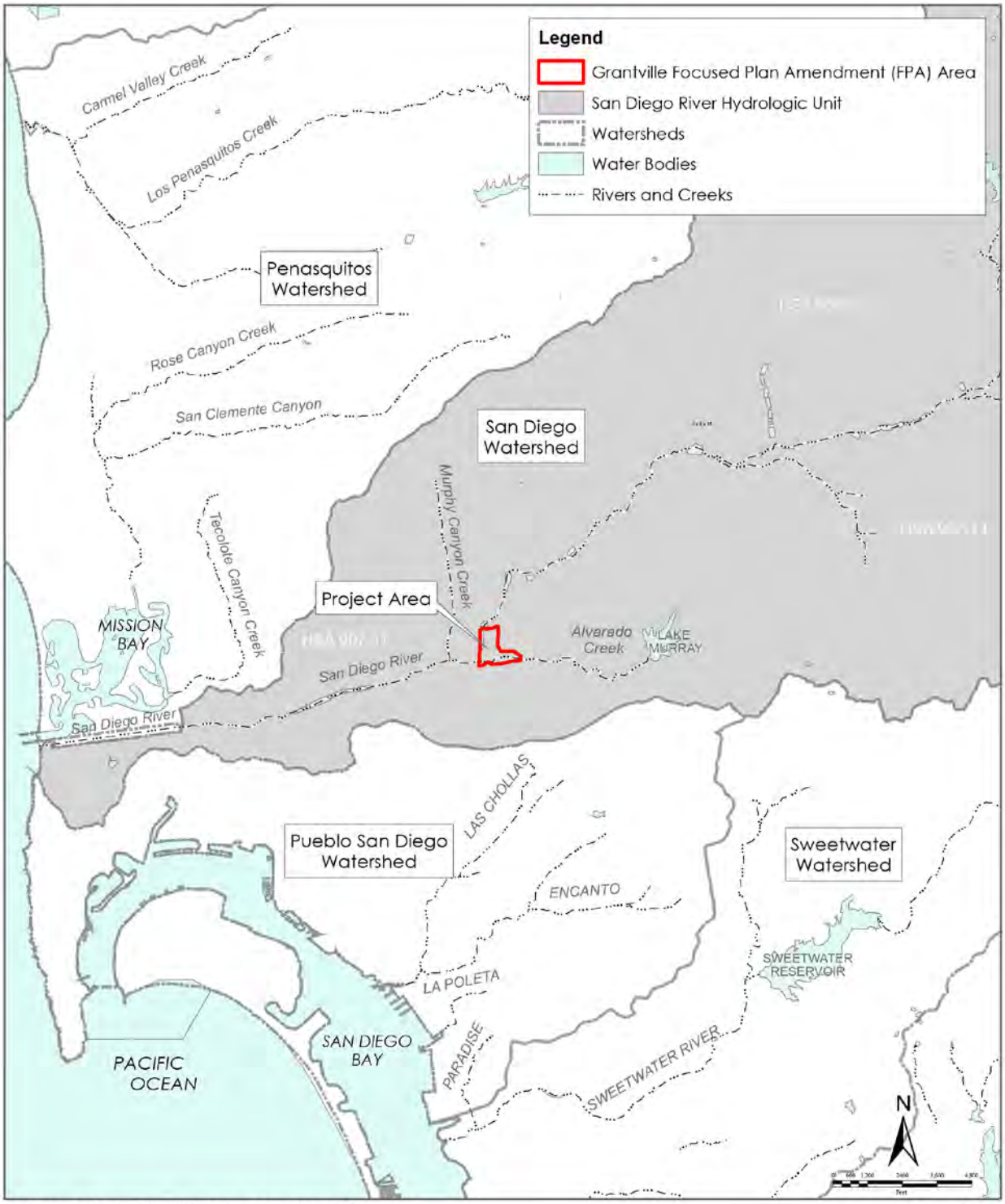
The Mission Valley basin, a highly porous alluvial aquifer that is the subsurface water source in the proposed FPA area. The long, narrow basin covers approximately 11 square miles along the San Diego River. The Mission Valley alluvial aquifer has a storage capacity of approximately 40,000 acre-feet. Medium to coarse sand and gravel comprise much of the aquifer, and a 15 percent aquifer specific yield is reported. Well

productions in excess of 1,000 gallons per minute (gpm) have occurred within the basin. Because of the porosity of the aquifer, recharge through streamflow infiltration is rapid, and significant interchange between surface flows and groundwater flow occurs (San Diego River Watershed Workgroup, 2004).

5.7.1.4 Wetlands

According to the City's Biology Guidelines, wetlands are defined as areas characterized by hydric soils, wetland hydrology, and naturally occurring hydrophytic, or wetland, vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools (City of San Diego, 2012). Wetland communities adjacent to the proposed FPA area include Riparian Forest, Southern Riparian Scrub, Freshwater Marsh, and Open Water, the majority of which are located within the San Diego River corridor (Rocks Biological Consulting, 2014). These habitats support a number of sensitive biological resources, including rare, threatened or endangered plant and wildlife species. From a hydrologic perspective, there are large ponds within the San Diego River that reduce water flow velocity of the River and contain water throughout the year. Wetlands serve a number of hydrologic functions including, but not limited to, flood storage and stormflow modification, groundwater recharge and discharge, modification of precipitation and evaporation patterns, maintenance of water quality, estuarine water level balance, and erosion reduction (USGS, 1997).

Existing drainage basins within the proposed FPA area are depicted in Figure 5.7-2. —Existing Drainage Basins. SD-1 through SD-6 outlet into the San Diego River at sites where wetland vegetation communities are located. In addition, existing drainage basins A-1 through A-3, A-10, and A-11 outlet into Alvarado Creek at sites where wetland vegetation communities are located.



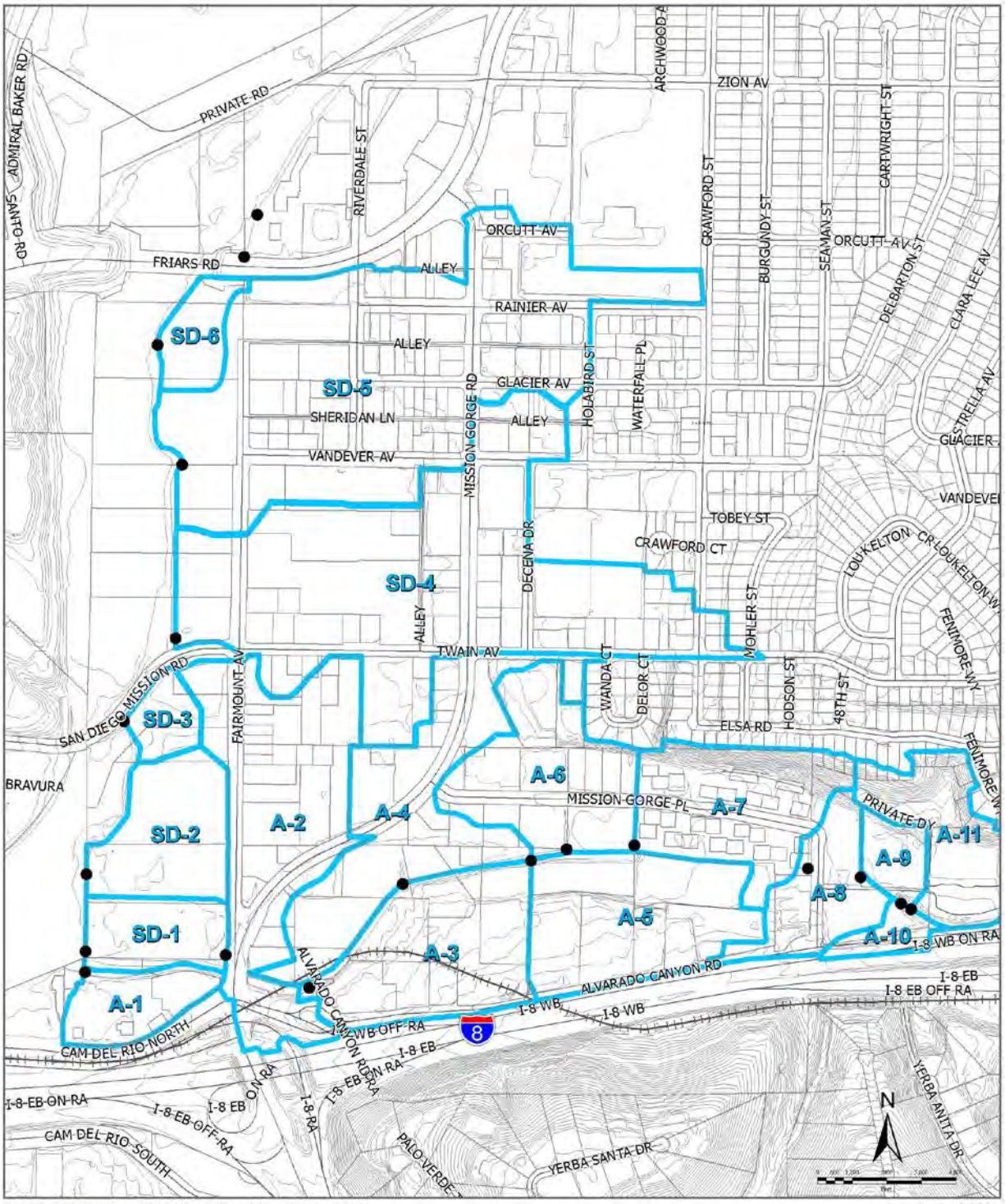
SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 August 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

San Diego River Watershed and Hydrologic Unit

FIGURE 5.7-1



SOURCE: 2014. SanGIS, 2014; City of San Diego 2014 August 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Existing Drainage Basins

FIGURE 5.7-2

5.7.1.5 Hydrological Regulations

A. City of San Diego Municipal Code

Within the City of San Diego, existing land uses, new development, and redevelopment are required to comply with the City of San Diego Municipal Code (SDMC). Related to hydrology, the following codes are applicable:

Chapter 14, Article 2, Division 1 – Grading Regulations. The purpose of these regulations is to address slope stability, protection of property, erosion control, water quality, and landform preservation, and to protect the public health, safety, and welfare of persons, property, and the environment.

Chapter 14, Article 2, Division 2 – Storm Water Runoff and Drainage Regulations. The purpose of this division is to regulate the development of, and impacts to, drainage facilities, to limit water quality impacts from development, to minimize hazards due to flooding while minimizing the need for construction of flood control facilities, to minimize the impacts to environmentally sensitive lands, to implement the provisions of federal and state regulations, and to protect the public health, safety, and welfare.

Chapter 14, Article 2, Division 4 – Landscape Regulations. The purpose of these regulations is to minimize the erosion of slopes and disturbed lands through revegetation; to conserve energy by the provision of shade trees over streets, sidewalks, parking areas, and other paving; to conserve water through low-water-using plantings and irrigation design; to reduce the risk of fire through site design and the management of flammable vegetation; and to improve the appearance of the built environment by increasing the quality and quantity of landscaping visible from public rights-of-way, private streets, and adjacent properties, with emphasis on landscaping as viewed from public rights-of-way.

Chapter 14, Article 3, Division 1 – Environmentally Sensitive Lands Regulations. The purpose of these 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, including, but not limited to coastal development in the Coastal Overlay Zone, 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.

B. San Diego River Park Master Plan

Over the last fifty years, commercial, residential and industrial uses have expanded around the San Diego River. Mining operations and urban development have changed the character and physical course of the San Diego River. The San Diego River Master Plan (City of San Diego, 2013) seeks to change this condition and enhance the relationship between the river and nearby land uses.

The following recommendations from the San Diego River Park Master Plan are specifically related to hydrology:

- Augment flows to the river periodically.
- Remove/circumvent obstacles that impede flow.
- Remove invasive vegetation species.
- Encourage the growth of appropriate riparian and upland vegetation.
- Rehabilitate the channel to encourage meander and braiding.
- Expand the river's recharge area.
- Future development projects should incorporate hydrology considerations in all planning and guidance documents and monitor water quality following implementation of the projects.

The San Diego River Park Master Plan divides the river into six reaches: the Estuary, Lower Valley, Confluence, Upper Valley, Gorge, and Plateau. The Confluence Reach of the San Diego River covers the proposed FPA area.

The Confluence segment is the area between Interstate 15 and Friars Road Bridge, and includes the point where Alvarado Creek joins the San Diego River at the southwest corner of the proposed FPA area. Closer to the north of the proposed FPA area, the reach is partially enclosed by a steep canyon wall on the west side of the river and industrial uses to the east. Encroaching development on the east and Interstate 8 to the south further emphasize the sense of enclosure. The river corridor is also constrained by a series of old gravel mine ponds below the Friars Road bridge that impede the normal hydrologic activities of the river system. In this area, extensive exotic vegetation infestation is present both in the ponds and in the river. The San Diego River Park Master Plan provides the following recommendations applicable to hydrology and water quality for the Confluence portion of the proposed FPA area:

- Improve water flow under the bridge at Mission Gorge Road/Fairmount Avenue for the Alvarado Creek to connect to the San Diego River.
- Identify land for public parks and open space through land acquisition or open space easements and identity an alignment for the San Diego River Pathway as Grantville redevelops.
- Study alternatives to improve the hydrology of the river where the river corridor is narrow and constrained by deep ponds that were created by past sand and gravel mining operations. Separating the river channel from the ponds is recommended where possible and feasible. In addition, it is recommended to remove barriers between pond sections to create a larger, deeper pond.

C. Baseline Assessment, San Diego River Watershed Management Plan

The San Diego River Watershed Management Plan Baseline Assessment analyzes the impact of human activities on hydrologic systems within the San Diego River watershed, including flood control measures.

This Plan is relevant to the proposed FPA because the San Diego River runs through the proposed FPA and has the potential to result in impacts to future development projects. The Plan provides the following recommendations to improve short-term flood protection:

- Restore, improve, and maintain drainage system capacities through vegetation clearing and sediment removal;
- Improve flood early warning systems;
- Install, restore, improve, and maintain erosion control and water retention structures, particularly in areas determined to be at high risk of flooding;
- Provide public information (e.g., signage and mailings) on flood hazards, particularly in areas determined to be at high risk to flooding; and,
- Adopt guidelines to encourage the "daylighting" of underground culverts as well as the removal of concrete/riprap channel lining as appropriate to improve water quality while maintaining and/or improving the existing level of flood protection.

5.7.2 Significance Determination Thresholds

Based on the City of San Diego's CEQA Significance Determination Thresholds, a significant hydrology impact would occur if implementation of the proposed FPA would:

- *Result in changes in absorption rates, drainage patterns, or the rate of surface runoff; or*
- *Otherwise impact local and regional water quality, including groundwater.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.7.3 Issue 1: Runoff

Issue 1: Would the proposed FPA result in a change in absorption rates, drainage patterns, or the rate of surface runoff?

5.7.3.1 Impact Analysis

The proposed FPA area is currently developed and includes a variety of land uses, including open space, single-family residential, multi-family residential, commercial, hospital, office, and industrial. Future development projects under the proposed FPA have the potential to change surface runoff characteristics including volume of runoff, rate of runoff, and drainage patterns. While the proposed FPA would allow for increased density, the permitted land uses would occur in an area that is fully developed and nearly 87% impervious; therefore, the volume or rate of runoff is not likely to be increased by future development projects. Instead, the proposed land use changes would have some potential to slightly decrease the volume of storm water runoff because current storm water regulations would require implementation of

Low Impact Development (LID) practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation.

All development in the City of San Diego is subject to drainage regulations through the SDMC, which requires that the existing flows of a property proposed for development are maintained to ensure that the existing structures and systems handling the flows are sufficient. Adherence to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which require installation of LID practices such as bio retention 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 for future development within the proposed FPA area. Furthermore, future development projects that would adhere to these requirements would likely reduce the volume and rate of surface runoff compared to the existing condition rather than increase runoff.

As shown in Table 5.7-1, the proposed land use amendments associated with the proposed FPA would increase softscape acreage and reduce hardscape acreage, relative to that of the existing conditions. Because softscape allows for greater groundwater infiltration and less runoff than hardscape, the surface conditions under the proposed land uses would be only 75.8% impervious, whereas the existing surface conditions are 87.0% impervious. Consequently, there would be an overall decrease in impervious surfaces and associated runoff with implementation of the proposed land use amendments.

The proposed FPA area includes 17 distinct drainage basins, of which 11 discharge into Alvarado Creek, and 6 discharge into the San Diego River. The runoff flow rates for these individual basins during a 2-year, 10-year, and 100-year storm event were calculated for the existing conditions and proposed conditions, as shown in Tables 5.7-2 and 5.7-3. For all but three of these basins, the flow rates were determined to be lower under the proposed conditions than under the existing conditions. However, for basins A-1, SD-1, and SD-2, the three storm event flow rates for the proposed conditions exceeded that of the existing conditions. In addition, for basin SD-3, the 10-year storm event flow rate for the proposed conditions exceeded that of the existing conditions. However, the higher flow rates are not substantial, and the overall flow rates for the proposed FPA area are expected to decrease. With implementation of the BMPs listed in Appendix F of this PEIR, as well as the California BMP Handbook, the proposed land use amendments would not result in a substantial increase in impervious surfaces and associated runoff. In fact, there would be an overall decrease in impervious surfaces and associated runoff with implementation of the proposed FPA, which would result in groundwater improvements as well. Therefore, implementation of proposed FPA would not have a significant adverse impact resulting from impervious surface increases.

Table 5.7-1: Site Impervious Area Composition

	Total Hardscape (Acres)	Total Softscape (Acres)	Total Basin Area (Acres)	% Impervious Surfaces
Existing	222	33	255	87.0
Proposed	194	61	255	75.8

Source: Fuscoe Engineering, 2014

Table 5.7-2: Runoff Flows – Existing Conditions

Basin	Runoff Coefficient	Tc	A	Q(100)	Q(10)	Q(2)
		min.	ac	cfs	cfs	cfs
Alvarado Creek	-	-	-	4,300	2,300	-
A-1	0.85	5	5.23	30	21	14
A-2	0.85	10	23.82	89	61	41
A-3	0.92	10	15.55	63	43	29
A-4	0.88	10	20.25	78	54	36
A-5	0.93	10	15.36	63	43	29
A-6	0.88	10	14.09	65*	45*	30*
A-7	0.92	10	13.97	56	39	26
A-8	0.95	5	7.58	49	34	23
A-9	0.95	5	2.88	19	13	9
A-10	0.95	5	1.83	12	8	5
A-11	0.79	10	10.65	104*	72*	48*
A Total	-	-	-	628	434	290
San Diego River	-	-	-	36,000	3,100	-
SD-1	0.85	5	5.91	34	24	16
SD-2	0.90	10	9.80	39	27	18
SD-3	0.94	5	2.78	18	12	8
SD-4	0.83	15	50.23	141	97	65
SD-5	0.88	15	51.62	333*	230*	153*
SD-6	0.95	5	3.90	25	18	12
SD Total	-	-	-	590	409	271

Source: Fuscoe Engineering, 2014. *Includes runoff from offsite basin(s).

Table 5.7-3: Runoff Flows – Proposed Conditions

Basin	Runoff Coefficient	Tc	A	Q(100)	Q(10)	Q(2)
		min.	ac	cfs	cfs	cfs
Alvarado Creek	-	-	-	4,300	2,300	-
A-1	0.95	5	5.23	34	24	16
A-2	0.84	10	23.82	88	61	40
A-3	0.70	10	15.55	48	33	22
A-4	0.74	10	20.25	66	45	30
A-5	0.78	10	15.36	52	36	24
A-6	0.70	10	14.09	54*	38*	25*
A-7	0.70	10	13.97	43	30	20
A-8	0.70	5	7.58	36	25	17
A-9	0.70	5	2.88	14	10	6
A-10	0.70	5	1.83	9	6	4
A-11	0.67	10	10.65	98*	68*	46*
A Total	-	-	-	536	371	248
San Diego River	-	-	-	36,000	3,100	-
SD-1	0.95	5	5.91	38	27	18
SD-2	0.95	10	9.80	41	28	19
SD-3	0.95	5	2.78	18	13	8
SD-4	0.74	15	50.23	125	87	58
SD-5	0.81	15	51.62	321*	222*	147*
SD-6	0.70	5	3.90	19	13	9
SD Total	-	-	-	562	389	258

Source: Fuscoe Engineering, 2014. *Includes runoff from offsite basin(s).

A. Flooding Impacts

Future development projects associated with the implementation of the proposed FPA would need to be evaluated on a project-by-project basis to determine if a project would result in any increase to the base flood elevation, or whether it could potentially alter the floodway or floodplain boundaries of any SFHA.

Future development projects within the proposed FPA area along the flood plain could have the potential to increase flooding on- or off-site. If development projects would alter the floodway or floodplain boundaries of a SFHA, the project would be required to obtain a Conditional Letter of Map Revision/Letter of Map Revision from FEMA.

The proposed FPA allows for the future development of Industrial, Commercial, and Retail land uses within the 100-year floodplain of San Diego River and Alvarado Creek. For any such development within the mapped floodplain, an applicant would be required to perform hydraulic and hydrologic analysis and submit associated studies and grading/improvement plans to the City of San Diego for review. The City of San Diego, as the Floodplain Administrator, would retain full jurisdiction for approval of development in the floodplain. Pursuant to SDMC Section 143.0145, any future specific development project must be studied to determine the effects to base flood elevations and ensure they will not result in flooding, erosion, or sedimentation impacts on or off-site. Floodplain regulations in the City are in effect regardless of the proposed FPA. Through required compliance with the City's floodplain regulations, flood hazard impacts associated with future development projects in the proposed FPA are anticipated to be reduced to a level less than significant. Development projects in the floodplain shall be designed such that new structures are constructed with a minimum finished, first floor elevation of two feet above the elevation of the 100-year storm; the development would not lead to an increase in the 100-year flowrate downstream; and, the development would not raise the flood elevation of the 100-year storm event.
Furthermore, with the implementation of the BMPs listed in Appendix F of this PEIR, as well as the California BMP Handbook, future development projects associated with the implementation of the proposed FPA would not result in a substantial increase in potential flooding impacts. Therefore, implementation of the proposed FPA would have a less than significant impact as a result of flooding.

B. Groundwater Impacts

Groundwater recharge in the proposed FPA area would potentially improve as a result of the proposed FPA. This is due to the reduction in impervious surface due to the proposed changes in land use and the incorporation of LID features, and is reflected in the lower weighted runoff coefficients calculated for the proposed conditions hydrology analysis. For future development projects within the proposed FPA area, no pumping of groundwater is anticipated in the post construction condition. During the construction phase, a small amount of construction dewatering may be required in portions of the proposed FPA area adjacent to the San Diego River and Alvarado Creek. However, this dewatering is not expected to substantially affect the overall groundwater table or any groundwater-dependant uses. As such, with the implementation of the proposed FPA, this issue is considered a less than significant impact.

Furthermore, the Construction and Post Construction BMPs, provided in Appendix F of this PEIR, reference the standard BMP details provided in the California BMP Handbook, prepared by the California Storm Water Quality Association (CASQA). With implementation of the BMPs listed in Appendix F of this PEIR, as well as the California BMP Handbook, future development projects associated with the implementation of the proposed FPA would not result in a substantial increase in impervious surfaces and associated runoff. In fact, there would be an overall decrease in impervious surfaces and associated runoff with implementation

of the proposed FPA, which would result in groundwater improvements as well. Therefore, implementation of the proposed FPA would result in a less than significant impact to groundwater.

C. Wetlands Impacts

Wetland communities adjacent to the proposed FPA area include Riparian Forest, Southern Riparian Scrub, Freshwater Marsh, and Open Water, a majority of which are located within the San Diego River corridor. In addition, Southern Riparian Scrub is located along portions of Alvarado Creek. These habitats support a number of sensitive biological resources, including rare, threatened or endangered plant and wildlife species. Currently, existing drainage basins SD-1 through SD-6 outlet into the San Diego River at sites where wetland vegetation communities are located. In addition, existing drainage basins A-1 through A-3 and A-10 through A-11 outlet into Alvarado Creek at sites where wetland vegetation communities are located. Although the locations of the existing drainage basin outlets would not change with the implementation of the proposed FPA, runoff flow volumes for certain drainage basins would vary from the existing condition.

As shown in Tables 5.7-2 and 5.7-3, runoff volumes for the 2-, 10- and 100-year storm events (Q(2), Q(10) and Q(100)) would increase in the proposed condition for drainage basins SD-1, SD-2, SD-9. A-1, and A-12. In addition, runoff volumes for the 10-year storm event (Q(10)) would increase with the implementation of the proposed FPA for drainage basin SD-3. However, there would be an overall decrease in the total runoff volumes for all three storm events (2-, 10-, and 100-year) for the drainage basins that outlet into the San Diego River and Alvarado Creek (A-1 through A-3 and A-10 through A-12). This net reduction in total runoff volumes into the San Diego River and Alvarado Creek would improve the functions and values of the wetland communities located within it. For drainage basins showing an increase in peak flow rates with the implementation of the proposed FPA, Mitigation Measure HYD-1 would reduce the potential impact to a level less than significant.

5.7.3.2 Significance of Impact

All future development projects associated with the implementation of the proposed FPA are subject to drainage and flood plain regulations in the SDMC, would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual, and would be required to implement recommended BMPs and comply with the California BMP Handbook. With the implementation of future development projects, the volume and rate of surface runoff within the proposed FPA would be reduced compared to the existing condition. In addition, through future development projects' compliance with floodplain regulations and design requirements, flood hazard impacts associated with the implementation of the proposed FPA would be reduced to a level less than significant. The Mitigation Framework as detailed in Mitigation Measure HYD-1 would ensure that the proposed peak flows would remain similar or be reduced from the existing peak flow rates. Therefore, it is anticipated that potential impacts to wetlands associated with runoff would be less than significant.

5.7.3.3 Mitigation Framework

With adherence to the SDMC, implementation of the recommended BMPs, and compliance with the California BMP Handbook, future development projects associated with the implementation of the proposed FPA would not substantially increase impervious surfaces or associated runoff. However, despite

the overall net reduction in impervious surface area, implementation of the proposed FPA is expected to cause an increase in runoff volumes and peak flow rates for certain drainage basins, as discussed in 5.7.3.1 C. For future development within these specific basins, the Mitigation Framework as detailed Mitigation Measure HYD-1 would reduce impacts to a level less than significant.

HYD-1 All future project-specific developments shall be reviewed by City staff for potential runoff volumes and peak flow rate impacts (see City of San Diego Storm Water Management and Discharge Control Ordinance). If City Staff determines that a future project specific development would potentially result in runoff impacts, the preparation of a project-specific Hydrology Study and Water Quality Technical Report shall be required. The project-specific reports shall identify specific mitigation measures such as on-site detention basins or bioretention facilities that would be incorporated into the design and construction of the project. Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss.

To accommodate vector control, any measure used to control runoff or protect water quality shall ensure that it does not result in 0.5-inch or more of standing water for more than 96 hours.

5.7.3.4 Significance After Mitigation

With implementation of the Mitigation Measure HYD-1, adherence to the SDMC, and all recommended BMPs, potential impacts would be reduced to a level less than significant.

5.7.4 Issue 2: Drainage Patterns

Issue 2: Would the proposed FPA result in a substantial alteration to on-site and off-site drainage patterns due to changes in runoff flow rates or volumes?

5.7.4.1 Impact Analysis

Because this EIR is programmatic and does not address any specific grading or drainage design within the proposed FPA area, it is assumed that existing drainage patterns would remain intact. This assumption is in accordance with City of San Diego guidelines that future proposed development within the proposed FPA area shall not divert water from existing drainage courses, and in fact, drainage basin areas and discharge locations are substantially the same under both the existing and proposed conditions.

The proposed FPA area includes 17 distinct drainage basin areas, of which 11discharge into Alvarado Creek, and 6 discharge into the San Diego River. The drainage flow rates for these individual basins during a 2-year, 10-year, and 100-year storm event were calculated for the existing conditions and proposed conditions, as shown in Tables 5.7-4 and 5.7-5. For all but three of these basins, the flow rates were determined to be lower under the proposed conditions, with the implementation of the proposed FPA, than under the existing conditions. For basins A-1, SD-1, and SD-2, the three storm event flow rates with the implementation of the proposed FPA exceeded that of the existing conditions. In addition, for basin SD-3, the 10-year storm event flow rate for the proposed FPA conditions exceeded that of the existing conditions. However, the higher flow rates are not substantial, and the overall flow rates with the implementation of the proposed FPA are expected to decrease.

Table 5.7-4:
Drainage Flows - Existing Conditions

DRAINAGE AREA/POINT	DRAINAGE AREA (ACRE)	Q_2 (CFS)	Q_{10} (CFS)	Q_{100} (CFS)
A-1	5.23	14	21	30
A-2	23.82	41	61	89
A-3	15.55	29	43	63
A-4	20.25	36	54	78
A-5	15.36	29	43	63
A-6	14.09	30*	45*	65*
A-7	13.97	26	39	56
A-8	7.58	23	34	49
A-9	2.88	9	13	19
A-10	1.83	5	8	12
A-11	10.65	48*	72*	104*
A Total		290	434	628
SD-1	5.91	16	24	34
SD-2	9.80	18	27	39
SD-3	2.78	8	12	18
SD-4	50.23	65	97	141
SD-5	51.62	153*	230*	333*
SD-6	3.90	12	18	25
SD Total		271	409	590

Source: Fuscoe Engineering, 2014. *Includes Offsite Areas

Table 5.7-5
Drainage Flows - Proposed Conditions

DRAINAGE AREA/POINT	DRAINAGE AREA (ACRE)	Q_2 (CFS)*	Q_{10} (CFS)*	Q_{100} (CFS)*
A-1	5.23	16	24	34
A-2	23.82	40	61	88
A-3	15.55	22	33	48
A-4	20.25	30	45	66
A-5	15.36	24	36	52
A-6	14.09	25*	38*	54*
A-7	13.97	20	30	43
A-8	7.58	17	25	36
A-9	2.88	6	10	14
A-10	1.83	4	6	9
A-11	10.65	46*	68*	98*
A Total		248	371	536
SD-1	5.91	18	27	38
SD-2	9.80	19	28	41
SD-3	2.78	8	13	18
SD-4	50.23	58	87	125
SD-5	51.62	147*	222*	321*
SD-6	3.90	9	13	19
SD Total		258	389	562

Source: Fuscoe Engineering, 2014. *Includes Offsite Areas

5.7.4.2 Significance of Impact

Implementation of the proposed FPA is not anticipated to result in a substantial alteration to on-site and off-site drainage patterns associated with changes in runoff flow rates or volumes; in fact, existing drainage patterns would be preserved and it is anticipated that there would be an overall decrease in drainage flow with implementation of the proposed FPA. However, future development projects within the proposed FPA area would be reviewed by City staff to ensure that drainage patterns are not impacted. Therefore, implementation of the proposed FPA would result in a less than significant impact for drainage patterns.

5.7.4.3 Mitigation Framework

Because there are no anticipated significant impacts associated with drainage issues, no mitigation measures are required.

5.7.4.4 Significance After Mitigation

No mitigation would be required; therefore, no potential adverse impacts are anticipated with regard to drainage patterns.

5.7.5 Conclusion

Future development projects associated with the implementation of the proposed FPA area would result in a beneficial impact to hydrology and no significant adverse impacts have been identified. The total site discharge would be reduced by decreasing the amount of impervious surfaces from that of the existing condition. Additionally, existing and proposed flows would be routed to on-site detention basins or bioretention facilities, which increase the time of concentration providing smaller intensities of flow. The City of San Diego would review for each individual future project grading plans and hydrology studies to

ensure that drainage patterns are not altered by future development projects within the proposed FPA. With the implementation of the Mitigation Framework as outlined in Mitigation Measure HYD-1, all future project-specific developments within the proposed FPA would be reviewed by City staff, and may require a project-specific hydrology study and WQTR prior to project approval. In addition, all future development projects would be required to implement recommended BMPs and comply with the California BMP Handbook. Therefore, with implementation of the Mitigation Framework as detailed in Mitigation Measure HYD-1 and adherence to the SDMC and California BMP Handbook, all potential impacts to hydrology, associated with implementation of the proposed FPA, would be reduced to a level less than significant.

5.8 Water Quality

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with water quality. Information contained in this section is summarized from the *Programmatic Water Quality Technical Report* (dated May 14, 2014) (Appendix G of this PEIR) prepared by Fuscoe Engineering. This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix G, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix G, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.8.1 Existing Conditions

5.8.1.1 Existing Water Quality

A. San Diego Regional Water Quality Control Board Basin Plan

Each of the nine regional boards in California is required to adopt a Basin Plan. The San Diego Basin Plan designates the beneficial uses for all surface and groundwaters in the San Diego Region. The proposed FPA area is located within the Mission San Diego Hydrologic Subarea, within the Lower San Diego Hydrologic Area and the Mission San Diego Hydrologic Subarea (907.11). The project area is divided into two major hydrologic basins, one draining to Alvarado Creek, and the other draining directly to the San Diego River. As further discussed in Section 5.8.1.1(D) below, the San Diego River, Pacific Ocean at the San Diego River Outlet, and Alvarado Creek have Clean Water Act Section 303(d) listed impairments; however, the State of California has not identified any total maximum daily loads (TMDLs) for the pollutants to any of the receiving waters from the proposed FPA area.

The present condition of the proposed FPA area includes approximately 280 acres of land predominantly in the developed condition. The central and northerly portions of the proposed FPA area generally slope to the west toward the San Diego River, while the southerly portion of the proposed FPA area slopes towards Alvarado Creek, which runs through this portion of the proposed FPA area. The existing network of streets and storm drain systems discharges runoff from the proposed FPA area to these watercourses at several outlet points. Existing land uses within the watershed include mostly commercial and industrial uses, but also include open space, single family residential, multifamily residential, and hospital/office.

B. Beneficial Uses

Beneficial uses of groundwater and surface water have been established for each water body within the San Diego Basin. According to the RWQCB Basin Plan:

> Beneficial uses are defined as the uses of water necessary for the survival or well being of man, plants and wildlife. The uses of water serve to promote the tangible and intangible economic, social and environmental goals of mankind. Examples include the drinking, swimming, industrial, and agricultural

water supply, and the support of fresh and saline aquatic habitats. According to the Basin Plan, beneficial uses have been designated for specific coastal water bodies, inland surface waters, and groundwater.

The State Water Quality Control Board (SWQCB) adopted a uniform list and description of beneficial uses to be applied throughout all hydrological basins of the State. The Mission San Diego Hydrologic Subarea has beneficial uses that may be affected by activities in the proposed FPA area. Designated beneficial uses for the receiving waters of the San Diego River include:

- ***Municipal and Domestic Supply (MUN)*** – Includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.
- ***Agricultural Supply (AGR)*** – Includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.
- ***Industrial Process Supply (PROC)*** - Includes uses of water for industrial activities that depend primarily on water quality.
- ***Industrial Service Supply (IND)*** – Includes uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
- ***Contact Water Recreation (REC 1)*** – Includes uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural springs.
- ***Non-contact Water Recreation (REC 2)*** – Includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- ***Marine Habitat (MAR)*** – Includes uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).
- ***Estuarine Habitat (EST)*** – Includes uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).
- ***Warm Freshwater Habitat (WARM)*** – Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- ***Wildlife Habitat (WILD)*** – Includes uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

- ***Rare, Threatened, or Endangered Species (RARE)*** – Includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened or endangered.
- ***Biological (BIOL)*** – Includes uses of water that support designated areas or habitats, such as refuges, parks, sanctuaries, ecological reserves, or Areas of Special Biological Significance (ASBS) where the preservation or enhancement of natural resources requires special protection.
- ***Migration of Aquatic Organisms (MIGR)*** – Includes uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.
- ***Spawning Habitat (SPWN)*** – Includes uses of water that support habitats suitable for reproduction and early development of fish. This use is applicable for only the protection of anadromous fish.
- ***Shellfish Habitat (SHELL)*** – Includes uses of water that support habitats suitable for the collection of filter feeding shellfish (e.g. clams, oysters and mussels) for human consumption, commercial, or sport purposes.
- ***Aquaculture (AQUA)*** – Includes the uses of water for aquaculture or mariculture operations including, but not limited to, propagation, cultivation, maintenance, or harvesting or aquatic plants and animals for human consumption or bait purposes.
- ***Commercial and Sport Fishing (COMM)*** – Includes the uses of water for commercial or recreational collection of fish, shellfish, or other organisms including, but not limited to, uses involving organisms intended for human consumption or bait purposes.

C. Water Quality Objectives

Like the designation of beneficial uses, the designation of water quality objectives must satisfy all of the applicable requirements of the California Water Code, Division 7 (Porter-Cologne Act) and the Clean Water Act. California Water Code, Section 13241 provides that each Regional Water Quality Control Board shall establish water quality objectives for the waters of the state (i.e., ground and surface waters), which in the Regional Board's judgment, are necessary for the reasonable protection of beneficial uses and for the prevention of nuisance. The Clean Water Act Section 303 requires that the State adopt water quality objectives (called water quality criteria) for surface waters.

D. 303(d) List of Impaired Water Bodies

The RWQCBs identify water quality objectives in order to protect the designated beneficial uses of the water bodies. Section 303(d) of the federal Clean Water Act (CWA, 33 USC 1250, *et seq*, at 1313(d)), requires States to identify waters that do not meet water quality standards after applying certain required technology-based effluent limits. Waters that do not meet the water quality standards are referred to as "impaired" water bodies. States are required to compile this information in a list and submit the list to the United States Environmental Protection Agency (USEPA) for review and approval. This list is known as the Section 303(d) list of impaired waters. As part of the listing process, states are required to prioritize water/watersheds for future development of TMDL. The TMDL establishes the allowable pollutant loadings or other quantifiable parameters for a water body and provides the basis for the State to establish water

quality-based controls. The purpose of TMDLs is to ensure that beneficial uses of the water body are restored and that the water quality objectives are achieved.

According to the California 2010 Integrated Report 303(d) List/ 305(b) Report published by the State Water Resources Control Board (SWRCB), the San Diego River and Pacific Ocean at the San Diego River outlet are beneficial use impaired water bodies. Alvarado Creek is identified as an impaired water body from Selenium. The San Diego River is impaired from Fecal Coliform, Enterococcus Bacteria, Low Dissolved Oxygen, Nitrogen, Phosphorus, Total Dissolved Solids, Toxicity, and Manganese. The Pacific Ocean at the San Diego River Outlet is impaired from Total Coliform and Enterococcus Bacteria.

There are several points of discharge into the San Diego River and Alvarado Creek within the proposed FPA area. The Pacific Ocean Shoreline at the San Diego River outlet is approximately nine miles downstream of the proposed FPA area. According to the 2010 303(d) list, the causes of water quality problems for the San Diego River include Urban Runoff/Storm Sewers and Wastewater. For Alvarado Creek, Other Urban Runoff is the primary contributor.

E. River Park Master Plan

Over the last fifty years, commercial, residential and industrial uses have expanded around the San Diego River. Mining operations and urban development have changed the character and physical course of the San Diego River. The San Diego River Master Plan was adopted by the City of San Diego in 2013 to change this condition and enhance the relationship between the river and nearby land uses.

The following recommendations from the San Diego River Park Master Plan are specific to water quality:

- Adopt programs to reduce/remove non-point source loads, including litter and solid waste.
- Future development projects should incorporate water quality considerations in all planning and guidance documents and monitor water quality following implementation of the projects.

The San Diego River Park Master Plan divides the river into six reaches: the Estuary, Lower Valley, Confluence, Upper Valley, Gorge, and Plateau. The Confluence Reach of the San Diego River is within the proposed FPA area.

The Confluence segment is the area between Interstate 15 and Friars Road Bridge, and includes the point where Alvarado Creek joins the San Diego River at the southwest corner of the proposed FPA area. Within the northern portion of the proposed FPA area, the reach is partially enclosed by a steep canyon wall on the west side of the river and industrial uses to the east. Encroaching development on the east and Interstate 8 to the south further emphasize the sense of enclosure. The river corridor is also constrained by a series of old gravel mine ponds below the Friars Road Bridge that impede the normal hydrologic activities of the river system. In this area, extensive exotic vegetation infestation is present both in the ponds and in the river.

F. Baseline Assessment, San Diego River Watershed Management Plan

The lower San Diego River Watershed, which encompasses the proposed FPA area, has generally poor surface water quality. Typical contaminants include elevated levels of biological indicators, total dissolved solids, pesticides, metals, petroleum, and trash. These contaminants are often the result of:

- Increased impervious surfaces causing increased runoff and pollutant loading and poor natural pollutant assimilation.
- Alteration of river morphology and natural pollutant assimilation and buffering zones.
- Increased input of nutrients and pesticides from landscaped areas.
- Increased input of trash and other floatables.
- Local groundwater contamination from spills and leaks of hazardous materials.
- Accidental discharges of raw sewage.
- Increased erosion and siltation as a result of construction and other activities/practices.
- Increased TDS as a result of poor irrigation practices and imported water use.

G. Ground Water Quality

Soils along the San Diego River are porous, and surface water moves freely between ground and surface water. As a result, the water surface of standing water within the San Diego River channel represents the groundwater table. The largest aquifer near the proposed FPA area is in Mission Valley. The Mission Valley aquifer covers approximately 11 square miles along the San Diego River and storage capacity is estimated at 40,000 acre feet of water. Within the San Diego River Watershed, groundwater quality is good. Due to the porous nature of the aquifer, recharge through streamflow infiltration is rapid, and significant interchange between surface flows and groundwater flow occurs. Designated beneficial uses for ground waters within the San Diego River Watershed include *Municipal and Domestic Supply*, *Agricultural Supply*, *Industrial Service Supply*, and *Industrial Process Supply*.

5.8.1.2 Water Quality Regulations

A. Federal Clean Water Act

The Clean Water Act (CWA) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA 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 CWA. Section 401 of the CWA 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 CWA established the 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.

B. California Department of Fish and Game Code – Streambed Alteration Program

California Department of Fish and Wildlife (CDFW) is responsible for protecting, conserving, and managing wildlife, plant, fish, and riparian resources in the State of California. Under Sections 1600–1607 of the Fish and Game 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., 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.

C. 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 CWA. 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 CWA 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 and groundwater basins and establish water quality objectives for those waters.

D. 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 HUs, 54 Hydrologic Areas, and 147 HSAs, 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.

E. Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the San Diego Municipal Code (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. The Drainage Design Manual provides a guide for designing drainage, and drainage-related facilities for developments within the City. Of particular relevance to a fully built-out community such as proposed FPA area is basic objective (10) from the Drainage Design Manual, which requires projects to coordinate proposed designs with existing structures and systems handling the same flows to ensure that new projects do not result in any increased runoff or generate increased sediment or pollutants. In addition to coordinating proposed design with existing

structures and systems, coordination with the Navy may be necessary where storm water runoff from proposed FPA area flows across Naval Station San Diego.

F. Storm Water Standards Manual (Starting January 1, 2016 new regulations will be in effect that will be pursuant to Storm Water Ordinance)

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:

- LID BMP Requirements
- Source Control BMPs
- BMPs Applicable to Individual Priority Development Project Categories
- Treatment Control BMPs

LID BMPs would be significant to site planning because these features require an area on-site to retain storm water for infiltration, re-use, or evaporation. The Storm Water Standards Manual states:

> For Priority Development Projects [e.g., tentative maps and development permits, construction permits, and public projects that have not begun initial design that have not been deemed complete prior to a certain date], the feasible portion of the post-project runoff volumes and peak flows from the water quality design storm . . . shall be infiltrated on-site. If it is shown to be infeasible to infiltrate the requisite volume of water, that water may be retained on-site for re-use or evapotranspiration. If it is shown to be infeasible to retain the requisite volume of water, then that water must be treated with 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 within the proposed FPA area 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 FPA area 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.

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.

G. General Plan

The City's General Plan presents goals and policies for storm water infrastructure in the Public Facilities, Services, and Safety Element (2008), and presents goals and policies for open space (including floodplain management) and urban runoff management in the Conservation Element (2008), and are described as follows:

PF-G.1 Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California RWQCB NPDES Permit standards.

PF-G.2 Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies

PF-G.3 Meet and preferably exceed regulatory mandates to protect water quality in a cost effective manner monitored through performance measures.

PF-G.4 Develop and employ a strategic plan for the City's watersheds to foster a comprehensive approach to storm water infrastructure improvements.

PF-G.5 Identify and implement BMPs for projects that repair, replace, extend, or otherwise affect the storm water conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.

PF-G.6 Identify partnerships and collaborative efforts to sponsor and coordinate pollution prevention BMPs that benefit storm water infrastructure maintenance and improvements.

CE-B.1 Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.

a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands.

b. Support the preservation of rural lands and open spaces throughout the region.

c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A).

d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands.

e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves.

f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan.

g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.

CE-B.2 Apply the appropriate zoning and Environmentally Sensitive Lands (ESL) regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.

a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. Where possible and practical, restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits.

b. Limit grading and alterations of steep hillsides, cliffs and shoreline to prevent increased erosion and landform impacts.

CE-B.3 Use natural landforms and features as integrating elements in project design to complement and accentuate the City's form (see also Urban Design Element, Section A).

CE-B.4 Limit and control runoff, sedimentation, and erosion both during and after construction activity.

CE-B.5 Maximize the incorporation of trails and greenways linking local and regional open space and recreation

CE-B.6 Provide an appropriate defensible space between open space and urban areas through the management of brush, the use of transitional landscaping, and the design of structures (see also Urban Design Element, Policy UD-A.3.o). Continue to implement a citywide brush management system.

CE-E.1 Continue to develop and implement public education programs.

a. Involve the public in addressing runoff problems associated with development and raising awareness of how an individual's activities contribute to runoff pollution.

b. Work with local businesses and developers to provide information and incentives for the implementation of Best Management Practices for pollution prevention and control.

c. Implement watershed awareness and water quality educational programs for City staff, community planning groups, the general public, and other appropriate groups.

CE-E.2 Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.

a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design.

b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas.

c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.

d. Increase the use of vegetation in drainage design.

e. Maintain landscape design standards that minimize the use of pesticides and herbicides.

f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts.

g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.

h. Enforce maintenance requirements in development permit conditions.

CE-E.3 Require contractors to comply with accepted storm water pollution prevention planning practices for all projects.

a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances.

b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction.

CE-E.4 Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.

CE-E.5 Assure that City departments continue to use "Best Practice" procedures so that water quality objectives are routinely implemented.

a. Incorporate water quality objectives into existing regular safety inspections.

b. Follow Best Management Practices and hold training sessions to ensure that employees are familiar with those practices.

c. Educate City employees on sources and impacts of pollutants on urban runoff and actions that can be taken to reduce these sources.

d. Ensure that contractors used by the City are aware of and implement urban runoff control programs.

e. Serve as an example to the community-at-large.

CE-E.6 Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.

a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations.

b. Review plans for new development and redevelopment for connections to the storm drain system.

c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.

CE-E.7 Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.

H. San Diego River Park Master Plan

The San Diego River Park Master was adopted April 2013 to provide a vision and guidance to reverse the deteriorating condition of the San Diego River. The 17.5 miles of the San Diego River within the City of San Diego are private and public land owners. Implementation of the Master Plan will rely on both private and public investment in the river valley. The implementation strategy includes an implementing framework, implementation tools, maintenance, management and security strategies, and public outreach/education methods to make the river park a success. The implementation framework looks at how the five principles have been implemented in the six reaches of the river and identifies areas where improvements are still needed. Federal, state and local funding sources, development tools and the required government approvals are discussed within the implementation tools. The maintenance, management and security section provides strategies for the future that could include a special maintenance district, a ranger program, an 'Adopt the River' program and the creation of a conservation corps or neighborhood youth corps program. The River Corridor area must also comply with the Land Development Code for Storm Water Runoff and Drainage Regulations. For the River Influence Area, the guidelines provide information on building requirements such as building setback, building orientation, and type of access to the river park from adjacent development, building transparency and reflectivity, location for off-street parking, equipment and storage areas, and appropriate plant materials. Also, depending on the type of project proposed within the river valley, ~~these~~ agencies such as FEMA and Army Corps of Engineers may need to be consulted and in some cases permits with applicable agency jurisdictions may be required.

I. Applicable Permits and Regulations

Pursuant to Section 402 of the Clean Water Act, the EPA has established regulations under the NPDES program to control direct storm water discharges. In California, the State Water Resources Control Board administers the NPDES permitting programs and is responsible for developing waste discharge requirements. The RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that would directly apply to design and construction of development projects within the proposed FPA area include the ~~–~~Construction Permits (Chapter 12 Article 9 Division 1) and requirements of the 2013 Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego Regional Water Quality Control Board. ~~General Construction Permit and the Municipal Storm Water Permit~~. These permits may be reissued several times during the life of the FPA project implementation. In addition to the General Construction and Municipal Storm Water Permits, other permits may be applicable to specific activities or project sites.

Municipal Storm Water Permit

The RWQCB issues the Municipal Storm Water Permit in order to establish the conditions under which pollutants can be discharged from the storm drain system to local streams, coastal lagoons, and the ocean. The Municipal Storm Water Permit implements requirements of the Clean Water Act and Federal NPDES storm water regulations.

The City of San Diego operates a Municipal Separate Storm Sewer System (MS4) required to comply with state and federal discharge regulations. In 2013, the RWQCB adopted a Regional MS4 Permit for the San Diego Region to regulate MS4 discharges to inland surface waters, bays and estuaries and coastal waters throughout the three counties within the San Diego Region. With the adoption of the Regional MS4 Permit, a major shift was made from prescriptive actions to an outcome based permitting approach with a focus on measuring and achieving improvements in storm water discharges and receiving water quality.

The Regional MS4 Permit jointly covers 39 municipal, county government, and special district entities (referred to jointly as co-permittees) located in Southern Orange County, Southwestern Riverside County, and San Diego County who own and operate large MS4s which discharge storm water (wet weather) runoff and non-storm water (dry weather) runoff to surface waters throughout the San Diego Region.

The City is a co-permittee under the Regional MS4 Permit. As a co-permittee, the City must implement several storm water management programs, including programs designed to control storm water discharges from new development and redevelopment. Specific sections of the Permit that apply to design and construction include Section D.1, Development Planning Component, and D.2, Construction Component. These titles refer to required components of the City's Jurisdictional Urban Runoff Management Program, which is one of the programs that must be implemented by the City under the Municipal Storm Water Permit. The City implements these requirements through their Jurisdictional Urban Runoff Management Program, Storm Water Standards Manual, and through site-specific permanent post-construction BMPs.

Total Maximum Daily Loads

The Clean Water Act requires the development of TMDLs when the beneficial uses of a waterbody are found be impaired. The TMDL requires the restoration of the beneficial uses by the issuance of Waste Load Allocations requiring the responsible parties to take actions to reduce pollutant loads within a specific time schedule. This determination results in responsible parties taking actions to achieve compliance with the interim and final reductions, and verified by monitoring. Section H of the Municipal Permit, TMDL, provides requirements for TMDLs and for the maximum amount of a given pollutant such as chemicals, bacteria, or sediment that can be released to a given water body. A TMDL is a "pollution budget" designed to help restore the beneficial uses of an impaired water body. A TMDL defines the maximum amount of a pollutant the water body can safely receive while meeting the water quality objectives identified in the Basin Plan. All TMDLs require submission of an implementation plan or a comprehensive load reduction plan to demonstrate the methodology a responsible party plans to achieve the TMDL goals.

Comprehensive Load Reduction Plan

The City, in cooperation with the cities of Lemon Grove and La Mesa, County of San Diego, Port District, U.S. Navy, and Caltrans, proposed strategies that are identified in the Comprehensive Load Reduction Plan to comply with the TMDL reduction requirements. These strategies include non-structural activities (e.g., education, enforcement, street sweeping, rain barrel rebates, etc.), and structural controls (e.g., grass swales, detention basins, etc.) that will be implemented over the next 20 years. As mandated, the *Comprehensive Load Reduction Plan* was submitted to the RWQCB on October 4, 2012.

~~*General*~~ *Construction Permits and Development Permits*

The purpose of the construction permit is to establish a review process for construction plans before construction, demolition, or installation and for inspection of construction work before use or occupancy. All projects required to apply for a construction or development permit, Construction Permits (Chapter 12 Article 9 Division 1) and requirements of the 2013 Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego Regional Water Quality Control Board. These projects are required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Plan.

~~During the construction phase, any project that is one acre or greater in size, or that is less than one acre in size but is part of a larger common plan of development, would be subject to the requirements of the General Construction Permit. For coverage by the General Construction Permit, the project owner would be required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) describing BMPs to be used during and after construction to prevent the discharge of sediment and other pollutants in storm water runoff from the project. Projects that are less than one acre in size and not part of a larger common plan of development are not subject to the requirements of the General Construction Permit. However, in the City, construction storm water requirements apply to all new development and redevelopment activities based on the City's Storm Water Management and Discharge Control Ordinance (SDMC Section 43.03 et. seq.). These projects are required to have a Water Pollution Control Plan, which identifies the pollution prevention measures that would be implemented.~~

~~*General Industrial Permit (Outdated Information – All* development permits or construction permits are subject to the Storm Water Ordinance)~~

~~Industrial facilities are subject to "Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities" (General Industrial Permit). The General Industrial Permit requires the implementation of storm water management measures and development of a SWPPP for operation of existing industrial facilities and proposed new industrial facilities.~~

Other Regulatory Permits

Alteration to Waters of the U.S. and/or State, such as Alvarado Creek and San Diego River, would require permits issued at many levels from federal, state, and local agencies, including a Section 404 (of the Clean Water Act) Permit from the Army Corps of Engineers (ACOE), a Section 401 Water Quality Certification from the RWQCB, and a Streambed Alteration Agreement with CDFW.

5.8.2 Significance Determination Thresholds

Based on the City of San Diego's CEQA Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed FPA, a significant water quality impact would occur if implementation of the proposed FPA would:

- *Result in substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or,*
- *Impact local and regional water quality, including groundwater.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.8.3 Issue 1: Pollutant Discharge

Issue 1: Would the proposed FPA result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

5.8.3.1 Impact Analysis

Future development projects associated with the implementation of the proposed FPA would have the potential to change pollutant discharges. The volume of runoff within the proposed FPA area is not expected to increase and would probably decrease through the required implementation of LID design. Furthermore, the pollutants that are listed for the area tributaries would likely be reduced with implementation of storm water BMPs, as the existing development in the area was constructed prior to storm water regulations were adopted. The LID practices not only reduce pollution by reducing runoff volume, but also can provide treatment by filtration and microbial action for runoff that will ultimately be discharged through underdrains. The existing development within the proposed FPA area typically does not include any other structural practices to prevent the transport of pollutants off-site, such as trash traps or manufactured filtration devices. Currently, only specific industries subject to the General Industrial Permit may have implemented some storm water management practices to control pollution.

The following constituents are commonly found on similar land uses as those in the proposed FPA and could affect water quality:

- Sediment discharge due to construction activities and post-construction areas left bare
- Nutrients from fertilizers, animal waste, detergents, automobile emissions, and organic matter
- Heavy Metals from automobile sources
- Organic compounds found in pesticides, solvents, and hydrocarbons
- Trash and debris deposited in drain inlets
- Oxygen demanding substances from plant debris, food waste, and chemical waste
- Hydrocarbons such as oil and grease from paved areas

- Bacteria and viruses from food and animal waste products and fertilizer
- Pesticides from application in landscaped areas and around buildings

Based on the 2012 San Diego Storm Water Standards Manual, the pollutants given in Table 5.8-1 are anticipated, taking into account the proposed FPA land uses.

According to Table 5.8-1 from the City of San Diego Storm Water Standards Manual, the proposed land uses within the proposed FPA area have anticipated or potential pollutants for sediment, nutrients, heavy metals, organic compounds, trash & debris, oxygen demanding substances, oil & grease, bacteria and viruses, and pesticides.

Table 5.8-1
Anticipated and Potential Pollutants

	SEDIMENT	NUTRIENTS	HEAVY METALS	ORGANIC COMPOUND	TRASH & DEBRIS	OXYGEN DEMANDING SUBSTANCES	OIL AND GREASE	BACTERIA & VIRUSES	PESTICIDES
Detached Residential Development	X	X			X	X	X	X	X
Attached Residential Development	X	X			X	P(1)	P(2)	P	X
Commercial Development	P	P		P(2)	X	P(5)	X	P(3)	P(5)
Automotive Repair Shops			X	X(4)(5)	X		X		
Restaurants					X	X	X	X	P(1)
Steep Hillside Development	X	X			X	X	X		X
Parking Lots	P(1)	P(1)	X		X	P(1)	X		P(1)
Streets Highways and Freeways	X	P(1)	X	X(4)	X	P(5)	X	X	P(1)

Notes:
X = Anticipated
P= Potential
(1) A potential pollutant if landscaping exists on-site.
(2) A potential pollutant if the project includes uncovered parking areas
(3) A potential pollutant if land use involves food or animal waste products.
(4) Including petroleum hydrocarbons
(5) Including solvents
Fuscoe Engineering, 2014

Receiving waters have 303(d) beneficial use impairments consisting of Fecal Coliform, Enterococcus Bacteria, Toxicity, Low Dissolved Oxygen, Manganese, Nitrogen, Phosphorus, Selenium, Total Dissolved Solids to include Salinity, Chlorides and Sulfates. Therefore, pollutants given in Table 5.8-2, which are designated as anticipated or potential for future development within the proposed FPA area as well as have 303(d) impairments downstream, are considered primary pollutants of concern.

The following conditions are anticipated to be encountered in the construction and post-construction phase of future development projects within the proposed FPA area and would be required to comply with the SDMC and the implementation of the recommended BMPs that are further described in Appendix F of this PEIR:

Table 5.8-2
Primary Pollutants of Concern

PRIMARY POLLUTANTS OF CONCERN	SPECIFIC 303(D) IMPAIRMENT
SEDIMENT	Total Dissolved Solids
NUTRIENTS	Phosphorus, Nitrogen, Selenium
ORGANIC COMPOUNDS	Low Dissolved Oxygen
TRASH & DEBRIS	Low Dissolved Oxygen
OXYGEN DEMANDING SUBSTANCES	Low Dissolved Oxygen
BACTERIA & VIRUSES	Fecal Coliform, Enterococcus Bacteria
METALS	Manganese

Fuscoe Engineering, 2014

A. Sediment

Post-Construction Phase

Future development projects within proposed FPA area would implement Site Design, Source Control and Treatment Control BMPs which will effectively remove sediment from runoff prior to discharge to the storm drain system. Possible Treatment Control BMPs for projects for which sediment is an anticipated pollutant, which have a high or medium removal rate of sediment, include infiltration trench, infiltration basin, retention/irrigation, wet pond, constructed wetland, extended detention basin, vegetated swale, vegetated buffer strip, Biofiltration, media filter, and vortex separator/wet vault.

Construction Phase

As a result of grading and other activities, construction sites can contribute large amounts of sediment to downstream channels unless properly managed. These construction activities associated with future development projects within the proposed FPA area could impact water quality due to sheet erosion of exposed soils and subsequent deposition of particles and pollutants in drainage ways or introduction of construction-related pollutants. Grading activities and sediment stockpiles, in particular, can lead to exposed areas of loose soil that are susceptible to uncontrolled sheet flow. The use of materials such as fuels, solvents, and paints during the development of the sector areas also present a risk to surface water quality due to an increased potential for pollutants entering the storm drain system.

Under the Statewide General Construction NPDES Permit (Order No. 2009-0009-DWQ amended by 2010-0014-DWQ & 2012-006-DWQ), an applicant of any future development project within the proposed FPA area would be required to submit a Notice of Intent to the SWRCB prior to commencement of construction activities. In addition, a SWPPP would be prepared and implemented for each development project proposed within the proposed FPA area, and revised as necessary as administrative or physical conditions change. The SWPPP would describe BMPs meeting the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology (BAT/BCT) standards required by the Construction Permit and that address pollutant source reduction and will ensure that water quality standards are not exceeded in the receiving waters. These include, but are not limited to erosion controls, sediment controls, tracking controls, non-storm water management, materials & waste management, and good housekeeping practices. The SWPPP shall be developed in accordance with the construction plans. The SWPPP shall provide BMPs that are to be maintained for the duration of the construction as well as measures that are specific to each phase of construction.

As a result of the selected BMPs, source control measures, and compliance with the California BMP Handbook, it is expected that sediments in runoff would not be increased, that water quality standards would not be exceeded and that beneficial uses would not be adversely affected. In order to reduce the amount of sediment discharged off-site due to construction activities, future development projects within the proposed FPA area would implement an effective combination of erosion and sediment control BMPs in conformance with the Construction Permits (Chapter 12 Article 9 Division 1) and requirements of the 2013 Municipal Separate Storm Sewer System (MS4) Permit issued by the San Diego Regional Water Quality Control Board. ~~General Construction Permit~~.

B. Nutrients

Nutrients from sources such as fertilizer, animal waste, detergents, automobile emissions and organic matter are to be minimized through appropriate source control measures such as the use of phosphate free fertilizers. Limiting sediment discharge during the construction phase of projects within the proposed FPA area through proper SWPPP protocols would limit the amount of nutrients reaching offsite waters. Also, any nutrients picked up by surface runoff on projects where nutrients are an anticipated pollutant would be conveyed to the LID and Treatment Control BMPs, which would be implemented for all future projects within the proposed FPA area. Treatment Control BMPs, which provide a high or medium removal rate for nutrients include, infiltration trench, infiltration basin, retention/irrigation, wet pond, and constructed wetland. Providing adequate BMPs on projects within the proposed FPA area would result in significant pollutant removal, creating a condition where nutrients would not be contained in runoff from future development projects at levels that could adversely affect water quality or beneficial uses in downstream waters.

C. Organic Compounds

Organic compounds are carbon-based, and are typically found in pesticides, solvents, and hydrocarbons. Organic compounds can also sorb to sediments, creating a situation where pollutants are mobilized through sediment transport. Future development projects within proposed FPA area would be required to implement Source Control BMPs, which are designed to limit the availability of pollutant discharge to downstream waters, as well as Treatment Control BMPs to remove organic compounds from runoff on

future projects where organic compounds are an anticipated pollutant. Integrated Pest Management methods would be used to limit pesticide application, resulting in a minimal amount of pollutants reaching the downstream waters. Maintenance staff would be trained in ways to minimally use pesticides, as well as policies concerning storage and spill clean up. Additional Source Control BMPs would include properly designed and maintained vehicle equipment wash areas, maintenance bays, outdoor processing areas, and fueling areas. Treatment Control BMPs, which provide a high or medium removal rate of organic compounds include, infiltration trench, infiltration basin, retention/irrigation, wet pond, constructed wetland, extended detention basin, vegetated swale, vegetated buffer strip, biofiltration, and media filter.

D. Trash and Debris

Development can generate moderate/large amounts of trash and debris if not properly managed. Trash and debris can contribute to the degradation of receiving waters by disruption of physical habitats, attracting pests and increasing the mobilization of nutrients, pathogens, metals and other pollutants that may be attached to the surface. Future development projects within the proposed FPA area have the potential to generate trash and debris, which could be carried in runoff. Maintenance staff employed onsite would be responsible for monitoring any patterns of waste/litter onsite and take corrective action, as well as properly maintaining and cleaning trash disposal areas. Additionally, any trash or debris carried by storm flows on future projects within the proposed FPA area would be captured by LID and Treatment Control BMPs. Treatment Control BMPs, which provide a high or medium removal rate of trash and debris include, infiltration trench, infiltration basin, retention/irrigation, wet pond, constructed wetland, extended detention basin, vegetated buffer strip, Biofiltration, media filter, water quality inlet, vortex separator/wet vault, and drain inserts.

E. Oxygen Demanding Substances

Oxygen demanding substances onsite include biodegradable organic material, which may come from plant debris, food waste, or chemical waste. If allowed to reach receiving waters, this material creates a situation where dissolved oxygen levels may plummet, resulting in poor water quality. Source controls including proper clean up of the park area, and placement of waste receptacles would reduce the amount of these substances contained on the onsite runoff. In addition to source controls, storm water runoff from future development projects within the proposed FPA area, for which oxygen demanding substances are an anticipated pollutant, will be treated through LID site design as well as Treatment Control BMPs designed to remove pollutants prior to discharge to the offsite storm drain. Treatment Control BMPs, which provide a high or medium removal rate for oxygen demanding substances, include infiltration trench, infiltration basin, retention/irrigation, wet pond, constructed wetland, extended detention basin, Biofiltration, and media filter.

F. Bacteria & Viruses

Future development projects within the proposed FPA area have the potential to introduce bacteria and viruses to storm water runoff. Sources of bacteria and viruses include food waste, animal waste, and fertilizer. Source Controls such as proper grounds maintenance and design of trash storage areas would help prevent the introduction of bacteria and viruses to storm water runoff. Additionally, LID and Treatment Control BMPs would be implemented by individual development projects within the proposed FPA, for

which bacteria and viruses are anticipated pollutants, to remove bacteria and viruses that are introduced to storm water runoff. Treatment Control BMPs, which provide a high or medium removal rate for bacteria and viruses, include infiltration trench, infiltration basin, retention/irrigation, wet pond, constructed wetland, extended detention basin, Biofiltration, and media filter.

G. Dry Weather Flow

Although the previous discussions have focused on wet weather flows, dry weather flows are also important. Dry weather flows due to anthropogenic sources have the potential to impact local receiving water bodies. Dry weather flows are typically low in course sediment due to the low flow rates but pollutants associated with suspended solids (such as phosphorous, trace metals, pesticides) are typically found in low concentrations in dry weather flows. Dry weather flows can also transport constituents such as bacteria and some pesticides.

Future development projects within the proposed FPA area are not expected to generate significant dry weather flows due to Source Control BMPs such as use of efficient irrigation systems and landscape design, as well as properly designed and maintained vehicle equipment wash areas, maintenance bays, outdoor processing areas, and fueling areas. When dry weather flows do occur, they would be conveyed toward the LID and Treatment BMPs as described in Appendix F of this PEIR for water quality treatment.

Based on the analysis above, the potential for violation of water standards as a result of future development of projects within the proposed FPA area is considered a significant impact. However, each future development project within the proposed FPA area would be required to comply with the Mitigation Framework detailed in Section 5.7, Hydrology and any additional requirements of the City of San Diego Municipal Storm Water Ordinance. All projects ~~requiring discretionary approvals~~ are subject to certain minimum storm water requirements. Each project would be required to obtain approval from the City of San Diego in order to comply with the requirements of the RWQCB concerning coverage under the GCP and associated local NPDES regulations to ensure that the potential for water quality degradation and soil erosion is minimized on a project-by-project basis. In accordance with standard City of San Diego project permitting and approval procedures, a NOI for coverage of projects under the GCP would be filed with the RWQCB prior to the issuance of a grading permit for projects one acre or greater of soil disturbance. Accordingly, a SWPPP would be prepared and implemented for each grading permit within the proposed FPA area, and revised as necessary, as administrative or physical conditions change. The San Diego RWQCB, upon request, must instruct the developer to make the SWPPP available for public review. The SWPPP would describe BMPs that address pollutant source reduction and provide measures/controls necessary to mitigate potential pollutant sources. These include, but are not limited to: erosion controls, sediment controls, tracking controls, non-storm water management, materials & waste management, and good housekeeping practices. Each individual project shall be examined to ensure compliance with the goals and recommendations described in the San Diego River Park Master Plan, as well as the San Diego River Watershed Management Plan.

Furthermore, future development projects within the proposed FPA would be required to implement post-construction BMPs, which would include site design, source control, and treatment control practices, many

of which overlap with LID practices. Before any construction permits are issued for development projects, documentation of specific storm water BMPs and LID practices is required. The storm water BMPs would reduce the amount of pollutants transported from a future proposed development project to receiving waters.

As such, adherence with the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; the implementation of BMPs; the implementation of the Mitigation Framework detailed in HYD-1; and compliance with California BMP Handbook, would reduce water quality impacts associated with the construction of future development projects within the proposed FPA area to a level less than significant. Therefore, implementation of the proposed FPA would result in a less than significant water quality impact.

5.8.3.2 Significance of Impact

With the adherence to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; the implementation of BMPs; the implementation of the Mitigation Framework detailed in HYD-1; and compliance with California BMP Handbook, potential water quality impacts associated with the construction of future development projects within the proposed FPA area would be reduced to a level less than significant. Therefore, implementation of the proposed FPA would result in a less than significant water quality impact.

5.8.3.3 Mitigation, Monitoring, and Reporting

With the adherence to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; the implementation of BMPs; the required Mitigation Framework detailed in Mitigation Measure HYD-1; and compliance with California BMP Handbook, water quality impacts would be less than significant.

5.8.3.4 Significance After Mitigation

Future development implemented in accordance with the FPA would be subject to the requirements of the Storm Water Standards which includes design of new or improved system to meet local and state regulatory requirements satisfactory to the City Engineer. Strict adherence to the Mitigation Framework detailed in Mitigation Measure HYD-1, which requires regulatory compliance as noted above, would reduce impacts related to pollutant discharges to water bodies to below a level of significance.

5.8.4 Conclusion

The implementation of the proposed FPA is not expected to have a significant impact on water quality, because future development projects within the proposed FPA area would be required to adhere to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; implementation of construction and post-construction BMPs; implementation of the Mitigation Framework as outlined in Mitigation Measure HYD-1, and compliance with California BMP Handbook. Therefore, water quality impacts would be less than significant.

5.9 Historical Resources

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with historical resources. Information contained in this section is summarized from the *Revised Draft Historic Resources Reconnaissance Survey for Grantville Focused Plan Amendment* (dated May 2014) and the *Cultural Resources Technical Report for the Grantville EIR Project* (dated November 2013), both prepared by ASM Affiliates, Inc. These documents are attached as Appendices H1 and H2 of this PEIR, respectively.

Since the development of Appendices H1 and H2, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendices H1 and H2, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.9.1 Existing Conditions

5.9.1.1 Records Search and Literature Review

A records search of the California Historical Resources Information System (CHRIS) at San Diego State University's South Coastal Information Center (SCIC) was conducted on October 9, 2013. The records search area included a 0.5-mi. buffer zone around the project area. The search included all relevant site records on file with the SCIC, as well as a search of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), Native American Heritage Commission (NAHC), and other local registers to determine if significant archaeological or historical sites had previously been recorded within or near the project survey area. Significant archaeological or historical sites are those that contain physical features, both natural and constructed, which reflect past human experience and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance.

A. Historic Buildings and Structures

As listed in Table 5.9-1, the records search and literature review revealed that nine historic buildings have been previously recorded within the 0.5-mi. records search buffer, but none of the historic buildings are within the project area.

Table 5.9-1: Historic Buildings within the Project Area and Half-Mile Records Search Radius

Address (Source: ASM Affiliates, 2013)	**Common/Historic Name**	**City**	**Location in Relation to the Project Area**
10810 San Diego Mission Road	San Diego Mission Church	San Diego	Outside
2400 Admiral Baker Road	Van Deman Hall USAR Center	San Diego	Outside
4256 Ridgeway	-	San Diego	Outside
4449 Yerba Santa Drive	Bond-Neutra House	San Diego	Outside
5317 E. Palisades Road	Edna Thomas House	San Diego	Outside
6914 Mission Gorge Road	-	San Diego	Outside
6974 Mission Gorge Road	-	San Diego	Outside
6980 Mission Gorge Road, Suite B	-	San Diego	Outside
6980 Mission Gorge Road, Suite E	-	San Diego	Outside

B. Archeological Resources

As listed in Table 5.9-2, 16 archeological resources have been previously recorded within the project area and the 0.5-mi. record search buffer. None of the previously recorded archeological resources have been recorded within or adjacent to the project area. Three of the previously recorded archeological resources are buildings, two are unknown, two are historic trash scatters, eight are prehistoric lithic scatters, and one is a prehistoric habitation and bedrock milling site.

Table 5.9-2: Previously Recorded Cultural Resources within the Project Area and Half-Mile Records Search Radius

Designation		Site Type	Recorder, Date	Relation to the Project Area
Primary Number (P-37-)	Trinomial (CA-SDI-)			
015654	-	AP1. Unknown	Kyle & Tift 1996	Outside
018411	-	HP2. Single Family Residence	--	Outside
018660	-	HP2. Single Family Residence	Cheney & McLean 2000	Outside
027911	-	HP34. Military Property	PAR Environmental Services, Inc. 2006	Outside
000035	35	AH4. Dumps/Trash Scatter	Wolf 2013	Outside
000202	202	AP1. Unknown	Troganza, n.d.	Outside
000239	239	AP2. Lithic scatter	Hall 1951	Outside
009899	9899	AP2. Lithic scatter	Kidder & Miller 1984	Outside
011613	11613	AP2. Lithic scatter	Pigniolo & Briggs 1990	Outside
011720	11720H	AP2. Lithic scatter	Clevenger & Briggs 1990	Outside
012088	12088	AP2. Lithic scatter	Pigniolo & Briggs 1991	Outside
012089	12089	AP2. Lithic scatter	Pigniolo & Briggs 1991	Outside
013706	13706	AP4. Bedrock Milling feature, AP15. Habitation debris	Tift & Strudwick 1994	Outside
014062	14015	AP2. Lithic scatter	Robbins-Wade, Alter, & Sculz 1997	Outside
-	14016	AP2. Lithic scatter	Kyle, Kyle, & Tift 1995	Outside
029023	18589	AH4. Trash scatter	Pigniolo 2007	Outside

Source: ASM Affiliates, 2014.

5.9.1.2 Historic Resources Field Survey

A historic resources reconnaissance field survey was conducted on November 4, 2013 to identify potential historic resources within the project area. During the survey, the architectural historians took written notes and photographs of overall street views and neighborhood settings. All buildings constructed prior to 1974 were identified, and information was recorded for architectural style, year built, resource attributes (property type), integrity, and National Register of Historic Places (NRHP) status code. For any properties recommended for future evaluation the potential NRHP criteria was noted. Information recorded for each parcel was directly entered in a City of San Diego Access Database.

The survey revealed that few resources remain that potentially represent important historical themes and periods of this area of San Diego. No property types remain that reflect the theme of Mission San Diego de Alcalá and Ex-Mission Rancho (1769-1887), nor Early Community Development (1887-1888). Few properties remain in the project area that are related to the theme of Agricultural Community Development (1887-1953), including two residential buildings (only one with moderate integrity), three commercial buildings (all

with low integrity) and one industrial building (low integrity). The one residential building with moderate integrity is the only building associated with this theme and period that has potential to be eligible.

More properties remain within the proposed FPA area that relate to the theme of Commercial, Industrial, and Manufacturing Development (1954-1973). However, few have the potential to be eligible as good representations of this theme and/or lack integrity. Five residential buildings remain that are potentially associated with this theme, but none sufficiently represent the suburban residential tract development typical of the theme and period, and all possess only low or moderate integrity. Of more than 50 commercial buildings potentially associated with this theme, only four retain high integrity. None of the 11 industrial buildings potentially associated with this theme retain high integrity. Only one institutional building exists that was constructed during the period of this theme, however it is not a good representation of it and lacks integrity. As such, only four commercial buildings with high integrity associated with this theme and period have the potential to be eligible.

In conclusion, five parcels are recommended for further evaluation within the FPA as potential eligible historic resources, as listed below in Table 5.9-3. Further analysis would be necessary to determine eligibility. Any building or structure found to be eligible is considered a historically significant resource as defined in the Historical Resources Regulations.

Table 5.9-3: Potentially Eligible Historic Resources

Address	Year Built	APN	Description	Integrity	Resource Attributes	Architectural Style	CRHR Code
4411 Glacier Ave.	1970	4585221700	Recommended potentially eligible	High	1-3 Story Commercial Building	No Style	7R
6201 Mission Gorge Rd.	1970	4585321200	Recommended potentially eligible, roadside commercial architecture	High	1-3 Story Commercial Building	Googie	7R
6290 Riverdale St.	1966	4585103200	Recommended potentially eligible	High	1-3 Story Commercial Building	Contemporary	7R
4385 Twain Ave.	1930	4611601000	Recommended potentially eligible	Moderate	Single Family Property	Craftsman Bungalow	7R
4340 Vandever Ave.	1970	4585102800	Recommended potentially eligible	High	1-3 Story Commercial Building	Post-Modern	7R

Source: ASM Affiliates, 2013

5.9.1.3 Archeological Resources Field Survey

An archeological resources field survey was conducted on November 7, 2013 by ASM Affiliates, Inc. The vast majority of the project area was developed and paved. No archeological resources were identified during the survey of the project area, and no archeological resources have been previously recorded within the project area. Undeveloped land was present on the western edge of the project area, along the San Diego River; on the northwest corner of the intersection of Twain Street and Mission Gorge; and along Waring Road at the eastern edge of the project area. Ground surface visibility within the undeveloped

areas of the project was 25 percent or less, as dense vegetation obscured the ground surface. The undeveloped land along the San Diego River contained steep slopes, pooled water, and native and non-native vegetation. The undeveloped land at Twain Street and Mission Gorge appears to have been previously developed and graded. The undeveloped land along Waring Road was characterized by dense vegetation and steep slopes.

5.9.2 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, impacts to historical resources would be considered significant if the proposed FPA would:

- *Result in any alteration, including adverse physical or aesthetic effects, and/or destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site;*
- *Result in any impact to existing religious or sacred uses within the potential impact area; and/or,*
- *Result in the disturbance of any human remains, including those interred outside of formal cemeteries.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.9.2 Issue 1: Prehistoric/Historic Resources

Issue 1: Would implementation of the proposed FPA result in adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites?

5.9.2.1 Impact Analysis

The proposed FPA area includes a total of five parcels (listed in Table 5.9-3) recommended for future evaluation as containing potentially eligible historic resources for the City Register and/or the CRHR. Future buildout of the proposed FPA area would facilitate future development that has the potential to impact these potentially eligible historic resources. The demolition or substantial alteration of a resource listed on, or formally determined eligible for, the following would represent a significant direct impact to historical resources:

- The NRHP or the CRHR, including contributors to the NRHR Historic Districts or California Register Historic Districts; or
- The San Diego Historical Resources Register, including contributors to San Diego Register Historic Districts; or
- That meets the CEQA criteria for historical resources.

While the proposed FPA does not specifically propose demolition or substantial alteration of a resource, it can be assumed that future development has the potential to result in significant direct and/or indirect impacts to historical resources if any of the five structures are deemed eligible. The implementation of

Mitigation Measure HR-1 as described in Section 5.9.2.3 below would reduce any significant impact to historic buildings or structures. Impacts to prehistoric resources, such as archaeological resources are provided below in Section 5.9.4.

5.9.2.2 Significance of Impact

The proposed FPA area includes five parcels recommended for future evaluation as containing potentially eligible historic resources in the City Register or CRHR. Implementation of the proposed FPA would facilitate future development that has the potential to significantly impact these resources. Implementation of the Mitigation Framework as detailed in Mitigation Measure HR-1 would reduce any significant impact to historic buildings or structures.

5.9.2.3 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations described above provide a regulatory framework for developing project-level historical resources mitigation measures for future ministerial or discretionary projects within the proposed FPA area. Prior to development on any of the five parcels within the proposed FPA that have been identified as containing potentially eligible historical structures, the following mitigation measure shall be implemented:

HR-1: Prior to issuance of any permit for a future development project ~~implemented in accordance with the FPA that would~~ City shall determine whether any structure in excess of 45 years of age has potential historical significance. All buildings on a parcel shall be evaluated together. 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 Historic Resources Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the historic 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:

a. Preparing a historic resource management plan;
b. Designing 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);
c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
d. 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;
e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning; and
f. Removing industrial pollution at the source of production.

Specific types of historical resource reports, outlined in Section III of the HRG, 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. If required, mitigation programs can also be included in the report.

5.9.2.4 Significance After Mitigation

Future development projects associated with the implementation of the proposed FPA that may directly or indirectly impact a significant historic resource, would be required to incorporate feasible mitigation measures, such as Mitigation Measure HR-1, adopted in conjunction with the certification of the subsequent CEQA review document. With the implementation of the Mitigation Framework as detailed in Mitigation Measure HR-1, impacts would be less than significant.

5.9.3 Issue 2: Religious/Sacred Uses and Human Remains

Issue 2: Would implementation of the proposed FPA result in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries?

5.9.3.1 Impact Analysis

There are no known religious or sacred uses within the proposed FPA area or within the immediate vicinity of the proposed FPA area. There are no known human remains including those interred outside formal cemeteries. However, there are many areas within the city where previously unknown prehistoric human remains have been uncovered during both archaeological investigations and grading activities. Therefore, the potential for encountering human remains during construction development activities is possible, and impacts to human remains as a result of implementation of the proposed FPA may occur. This would be considered a significant impact under CEQA.

5.9.3.2 Significance of Impact

Grading for future development has the potential to result in significant impacts to unknown human remains. While it is not expected that human remains would be disturbed as a result of implementation of the proposed FPA, there remains the potential for human remains to be present. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and in the State Health and Safety Code (Section 7050.5) shall be undertaken. Per Public Resources Code Section 5097.98, if a human remain if discovered as is identified as being Native American, a coroner is required to contact the Native American Heritage Commission within 24 hours.

5.9.3.3 Mitigation Framework

The Mitigation Framework for human remains would be the same as outlined for archaeological resources. With implementation of the Mitigation Framework as detailed in Mitigation Measure HR-2, provided below, impacts to human remains would be less than significant.

5.9.3.4 Significance After Mitigation

Implementation of the Mitigation Framework, as outlined in Mitigation Measure HR-2, would reduce impacts to human remains to a level less than significant.

5.9.4 Issue 3: Archaeological Resources

Issue 3: Would the proposed FPA cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

5.9.4.1 Impact Analysis

There are no known archaeological resources within the proposed FPA area or within the immediate vicinity of the proposed FPA area. However, there are many areas within the city where previously unknown archaeological resources have been uncovered during both archaeological investigations and grading activities. Therefore, the potential for encountering archaeological resources during construction development activities is possible, and impacts to archaeological resources as a result of implementation of the proposed FPA may occur. However, with the implementation of Mitigation Measure HR-2, as described in Section 5.9.4.3 below, impacts to archaeological resources would be reduced to a level less than significant.

5.9.4.2 Significance of Impact

The potential for encountering archaeological resources during construction development activities is possible, and impacts to archaeological resources as a result of implementation of the proposed FPA may occur. As such, a significant impact to archaeological resources is identified with the implementation of the future development projects within the proposed FPA. However, with the implementation of the Mitigation Framework as outlined in Mitigation Measure HR-2, described in Section 5.9.4.3 below, impacts to archaeological resources would be reduced to a level less than significant.

5.9.4.3 Mitigation Framework

The following mitigation measure is currently applied to projects subject to discretionary approval that could result in impacts to archaeological resources. Future development projects within the proposed FPA area would be subject to site-specific measures in effect at the time the projects are processed for discretionary review.

HR-2: Prior to issuance of any permit that could directly affect any archaeological resource or resources associated with prehistoric Native American activities, 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 that may be impacted by a development activity.

Initial Determination:

The environmental analyst shall 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 California Historical Resources Inventory System) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then an evaluation consistent with the City of San Diego's Historical Resources Guidelines shall be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains archaeological resources, preparation of an evaluation report is required. The evaluation report could generally include background research, a field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required that 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 Native American Heritage Commission (NAHC) must also be conducted at this time. Information about existing archaeological collections shall also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. 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 historical resources are identified through the background research and field surveys, then an evaluation of significance must be performed by a qualified archaeologist.

Step 2:

Once a resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors must be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representatives, 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). An archaeological testing program will be required, which includes 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 of San Diego's Historical Resources Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Historical Resources Guidelines and in accordance with the provisions outlined in Section 15064.5 of the State CEQA Guidelines. If significant historical resources are identified within the project's Area of Potential Effect (APE), the site may be eligible for local designation. At this time, 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 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 archaeological 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 (RDDRP) is required or is required to follow alternate treatment recommendations by the Most Likely Descendant (MLD), which includes a Collections Management Plan for review and approval. 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. If the archaeological site is an historical resource, then the limits on mitigation provided under CEQA Section 21083.2 shall not apply, and treatment in accordance with CEQA Guidelines Section 15162.4 and 21084.1 is required. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring shall 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 (TCP) or any archaeological site located on City property or within the APE 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 Public Resources Code Section 5097 must be followed. These provisions would be outlined in the MMRP included in the 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 in conformance with the California Office of Historic Preservation (OHP) "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental Analysis Section 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 TCPs 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 that 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 of San Diego. Appendix D (Historical Resources Report Form) shall be used when no archaeological resources were identified within the project boundaries.

Step 5:

For all 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. 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., AB 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) 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 must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must 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 Collections (dated May 7, 1993) and, if federal funding is involved, 36CFR79 of the Federal Register. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

5.9.4.4 Significance After Mitigation

Future development projects ~~associated with the implementation of the proposed FPA, which~~ will be required to implement Mitigation Measure HR-2 through the discretionary permitting process subject to Chapter 14 Article 3 Division 2. With the implementation of Mitigation Measure HR-2, impacts to archaeological resources associated with future development allowed by proposed FPA, would be reduced to a level less than significant.

5.9.5 Conclusion

Future development projects associated with the implementation of the proposed FPA ~~which~~ will be required to incorporate feasible mitigation measures, such as Mitigation Measure HR-1, adopted in conjunction with the certification of the project-specific CEQA review.

In addition, although no archaeological resources were found within the proposed FPA area, there is a potential for encountering archaeological resources or buried human remains during construction of future developments as a result of implementation of the proposed FPA. However, with the implementation of the Mitigation Framework as detailed in Mitigation Measure HR-2, impacts to archaeological resources would be reduced to a level less than significant.

5.10 Visual Effects/Neighborhood Character

This section of the PEIR discusses the potential environmental impacts of the proposed FPA to visual effects and neighborhood character.

5.10.1 Existing Conditions

5.10.1.1 Existing Visual Landscape

A. Community Character

The proposed FPA area is situated in the eastern portion of the City of San Diego, in the Navajo Community Plan area. The City of San Diego has adopted the Navajo Community Plan, which provides guidelines related to land use and development, as further described below in Section 5.10.1.2. The proposed FPA area is part of the Grantville Community, which is included in the larger 8,000-acre Navajo Community. Grantville is a subregional employment center located within the western portion of the Navajo area.

The proposed FPA area is generally urban in character. The existing development within the proposed FPA area includes commercial, office, industrial-related structures, residential, public and institutional facilities, parks, open space, and vacant land, but is mostly commercial and industrial in nature. The residential uses are minimal but include single-family and multi-family structures. Although the area includes the Grantville Trolley Station, the proposed FPA area is currently not pedestrian or bicycle friendly. The open space areas within the proposed FPA area include the San Diego River, Mission Trails Regional Park, and Alvarado Canyon. The area is blighted and industrial in nature and does not exhibit an aesthetic pleasing tone.

B. Landform

The proposed FPA area is located in a valley, generally bounded to the east, west and south by relatively flat developed land and to the north and portions of the east by hillsides and canyons that help to frame the community area and define the pattern of development within the neighborhoods. There are over 700 acres of scenic canyons, including Mission Gorge, which are dominant topographical features of the Navajo Community (City, 2013). The San Diego River has historically shaped the overall nature of the area's topography. The river currently traverses Mission Trails Regional Park and Mission Gorge, and runs along Mission Gorge Road in the northern portion of the proposed FPA area, flowing from northeast to southwest. The portion of the river located in the northeast section of the Navajo community has been significantly altered as a result of an ongoing sand and gravel extraction operation. Much of the area in and around the river has already been mined and is currently being used for industrial and contractor storage and operation uses. A mix of retail, industrial and industrial office park uses have been developed along the portion of the river that forms portions of the northern and western boundary of the proposed FPA area.

C. Light and Glare

The proposed FPA area is urbanized and substantial light and glare is produced by existing development. The proposed FPA area currently consists of commercial, office, industrial development, public institutions, vacant land, and open space. Existing levels of light and glare are that of an urban, developed

community with daytime glare from building windows, automobile windshields, and paved surfaces, and nighttime light from billboards, commercial signage, buildings, street lights, automobile headlights and parking lot/security lighting.

D. Scenic Resources

The proposed FPA area's built and natural visual resources are influenced by its proximity to the San Diego River, Mission Trails Regional Park, Alvarado Canyon, Cowles Mountain, Mission Valley, and Interstate-8 (I-8). The majority of the area consists of blighted industrial development that restricts public views of scenic resources. No significant existing landmarks are located within the proposed FPA area.

E. Public Views

The Navajo Community Plan does not include any officially designated scenic viewpoints or landmarks; however, public views towards the above mentioned scenic resources are minimal and scattered throughout the community. Since the community does not exhibit pedestrian-oriented design features and the commercial and industrial development occurs in a one- to two-story horizontal configuration along the landscape of the area, most public views towards scenic resources are blocked by industrial development. Overall, public views towards scenic resources are minimal in the proposed FPA area.

5.10.1.2 Local Visual Resource Regulations

The local visual resource regulations which are applicable to the proposed FPA area include objectives, guidelines, policies, goals, and recommendations described in the City of San Diego Land Development Code (2014), City of San Diego General Plan (2006), Navajo Community Plan (2013), and the San Diego River Park Master Plan (2013).

A. City of San Diego Land Development Code

Chapter 9 of the City of San Diego Land Development Code includes regulations and policies related to building, housing, and sign regulations. Chapter 13 of the Land Development Code provides regulations and policies according to zoning designations. These regulations include descriptions for building height, fencing, lighting, and setbacks, in addition to other depictions, for development according to land use.

B. City of San Diego General Plan – Urban Design Element

The City of San Diego General Plan – Urban Design Element's goals and recommendations, which directly apply to the visual aesthetics and/or neighborhood character of the proposed FPA area, include the following (2006):

UD-A.5 Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.

a. Relate architecture to San Diego's unique climate and topography.

b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well-established, distinctive character.

c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.

d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence.

e. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but also fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height or texture to provide visual interest.

f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level.

g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they would be visible from a public right-of-way or accessible public place or street.

h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments.

i. Maximize natural ventilation, sunlight, and views.

j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.

k. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.

UD-A.7 Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify "conservation areas" that retain original community character in sufficient quantity and quality but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district.

a. Create guidelines in community plans to be used for new development, so that a neighborhood's historic character is complemented within the conservation areas where appropriate (see also Historical Preservation Element, Policy HPA.2).

b. Review the redevelopment of property within conservation areas to maintain important aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.

UD-B.1 Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger

neighborhood or community plan area in which they are located for design continuity and compatibility.

a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that would significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.

b. Design new construction to respect the pedestrian orientation of neighborhoods.

c. Provide innovative designs for a variety of housing types to meet the needs of the population.

UD-B.5 Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.

a. Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community.

b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources.

c. Design open-ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary.

d. Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools.

e. Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding (see also Mobility Element, Policy ME-C.5).

f. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries.

g. Clarify neighborhood roadway intersections through the use of special paving and landscape.

h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails.

i. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas.

UD-B.6 Utilize alleys to provide improved and alternative pedestrian access to sites. This would include consideration of a promenade or paseo design for alleys with enhanced landscaping, and residential units or uses that face the alleys to activate them as

alternative pedestrian streets. This could provide an alternative function for alleys that is non-vehicular, but still provides linkages to other sites and uses and adds to a neighborhood's connectivity.

UD-C.2 Design village centers to be integrated into existing neighborhoods through pedestrian friendly site design and building orientation, and the provision of multiple pedestrian access points.

UD-C.3 Develop and apply building design guidelines and regulations that create diversity rather than homogeneity, and improve the quality of infill development.

a. Encourage distinctive architectural features to differentiate residential, commercial and mixed-use buildings and promote a sense of identity to village centers.

UD-C.5 Design village centers as civic focal points for public gatherings with public spaces (see also UD-C.1 for village center public space requirements and UD-E.1 for the design of public spaces).

a. Establish build-to lines to frame and define village center public space and pedestrian streets.

b. Ensure public spaces are easily accessible and open to the public. The mechanisms used to provide the public space would vary as appropriate and could include, but are not limited to: land dedications, joint use agreements, and public access easements. Public space areas may include reasonable hours of use restrictions, demarcation of private and publicly accessible areas, and other signage to communicate public access rights, responsibilities, and limitations.

c. Encourage provision of public space in the earliest possible phase of development, as determined by the public's ability to use and access the space.

UD-A.8 Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

a. Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CEA.11, CE-A.12, and Section J).

b. Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.

c. Use landscape to support storm water management goals for filtration, percolation and control erosion

d. Use landscape to provide unique identities within neighborhoods, villages and other developed areas.

e. Landscape materials and design should complement and build upon the existing character of the neighborhood.

f. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience.

g. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the City that contain tree-lined streets present a streetscape that creates a distinctive character.

1. Identify and plant trees that complement and expand on the surrounding street tree fabric.

2. Unify communities by using street trees to link residential areas.

3. Locate street trees in a manner that does not obstruct ground illumination from streetlights.

h. Shade paved areas, especially parking lots.

i. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers.

j. Use landscaped walkways to direct people to proper entrances and away from private areas.

k. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies.

l. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.

UD-B.1 Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.

a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that would significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.

b. Design new construction to respect the pedestrian orientation of neighborhoods.

c. Provide innovative designs for a variety of housing types to meet the needs of the population.

UD-B.8 Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single family projects.

a. Design attractive recreational facilities, common facilities, and open space that can be easily accessed by everyone in the development it serves.

b. Design outdoor space as "outdoor rooms" and avoid undifferentiated, empty spaces.

c. Locate small parks and play areas in central accessible locations.

UD-E.1 Include public plazas, squares or other gathering spaces in each neighborhood and village center (see also UD-C.1 and UD-C.5 for additional public space requirements in village centers, and UD-F.3 for policy direction on public art and cultural activities in public spaces).

a. Locate public spaces in prominent, recognizable, and accessible locations.

b. Design outdoor open areas as "outdoor rooms," developing a hierarchy of usable spaces that create a sense of enclosure using landscape, paving, walls, lighting, and structures.

c. Develop each public space with a unique character, specific to its site and use.

d. Design public spaces to accommodate a variety of artistic, social, cultural, and recreational opportunities including civic gatherings such as festivals, markets, performances, and exhibits.

e. Consider artistic, cultural, and social activities unique to the neighborhood and designed for varying age groups that can be incorporated into the space. f. Use landscape, hardscape, and public art to improve the quality of public spaces.

g. Encourage the active management and programming of public spaces.

h. Design outdoor spaces to allow for both shade and the penetration of sunlight.

i. Frame parks and plazas with buildings, which visually contain and provide natural surveillance into the open space.

j. Address maintenance and programming.

UD-F.1 Integrate public art and cultural amenities that respond to the nature and context of their surroundings. Consider the unique qualities of the community and the special character of the area in the development of public art and programming for cultural amenities.

a. Use arts and culture to strengthen the sense of identity of the Neighborhood and Urban Village Centers of each community.

b. Use public art and cultural amenities to improve the design and public support for public infrastructure projects.

c. Reinforce community pride and identity by encouraging artworks and cultural amenities that celebrate the unique cultural, ethnic, historical, or other attributes of each unique neighborhood.

d. Use public art and cultural amenities as a means to assist in implementation of community-specific goals and policies.

e. Use public art and cultural amenities as community landmarks, encouraging public gathering and wayfinding.

f. Encourage involvement of recognized community planning groups and other community stakeholders in the decision-making process regarding public art and cultural amenities.

UD-F.3 Enhance the urban environment by animating the City's public spaces.

a. Utilize public are and cultural amenities such as festivals to create vibrant and distinctive public squares, plazas, parks, and other public gathering spaces.

b. Ensure that public artworks respond to the nature of their surroundings both physically and conceptually.

c. Encourage the use of public art in highly visible places as a directional assistance that can be used to delineate access routes and entrance points.

d. In high foot traffic areas, use pedestrian-oriented art interventions to enhance the pedestrian experience.

e. Highlight points of interest throughout the City through the use of artwork and cultural amenities.

f. Encourage artworks and activities that animate public spaces and energize the cityscape.

g. Encourage temporary public artworks to create a dynamic changing and engaging environment.

h. Encourage artist-designed infrastructure improvements within communities such as utility boxes, street-end bollards, lampposts, and street furniture.

i. Encourage incorporation of vandal-resistant and easily repairable materials in art to reduce maintenance requirements.

j. Encourage the programming of changing exhibits and public uses through active management and programming of public spaces.

k. Encourage a range of activities, easily accessible, clean and attractive environment, and a space for people to socialize in order to attract legitimate users and thereby discourage improper behavior.

l. Provide front porches, parks, plazas, and other outside public spaces for residents to socialize.

C. Navajo Community Plan

The Navajo community is characterized by a wide variety of natural features including flat mesas, steep canyons, and rolling hills. The most prominent feature in the proposed FPA area is the San Diego River and Mission Trails Regional Park. Elevations within the community range from a low of around 100 feet above sea level at the westerly edge of Mission Gorge to 1,591 feet at the peak of Cowles Mountain, the highest point in the City of San Diego. Several streets and other public areas offer framed public views of panoramic aesthetic features such as the open space areas to the north of the community or to Lake Murray and its surrounding native habitats.

The Navajo community contains a diverse land use development pattern with a majority of the area maintaining low to medium residential densities, while the commercial and industrial uses are focused along the main traffic corridors of Mission Gorge Road and Navajo Road.

The Navajo Community Plan's goals and recommendations, which directly apply to the visual aesthetics and/or neighborhood character of the proposed FPA area, include the following (2013):

- Grading and landscaping standards should be improved. Hillside cuts, in particular, must be better controlled to preserve the natural topography;
- Enhance and maintain the aesthetic qualities of the San Diego River corridor as part of the open space system;
- The rear elevations of buildings which face the San Diego River or are visible from the street should be as well-detailed and visually interesting as the front elevations;
- Buildings developed adjacent to the river should be set back 150 feet from the river to avoid glare and shading impacts to the habitat;
- Continue the ongoing efforts to revitalize the commercial areas along Mission Gorge Road, establish one or more Business Improvement District;
- Site design should provide adequate visual buffers surrounding uses, such as with the use of landscaping or grade separation;
- Develop commercial areas which have desirably distinctive qualities in their design, appearance and operation;
- Improve the appearance of the existing strip commercial development on Mission Gorge Road between Interstate 8 and Zion Avenue by reducing signs, improving landscaping and architectural design, providing consistent building setbacks and providing adequate off-street parking;
- The removal of off-premise signs and the consolidation of multiple on-premise signs should be pursued during project reviews in an effort to reduce sign clutter and enhance the visual appearance of Mission Gorge Road;

- Ensure that industrial appearance and effects of industrial uses are compatible with the character of the surrounding residential and commercial areas and the sensitive resources of the San Diego River; and,
- Development along Mission Gorge Road shall comply with the regulations included in the Community Plan Implementation Overlay Zone (CPIOZ).

D. San Diego River Park Master Plan

According to the San Diego River Park Master Plan (2013) the following "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 shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities":

- Secondary pathways and trails should be visual and physical green connections that connect more people to the ecology, culture and history of the river.
- Green Gateways should be located below major highways that cross the river and should consist of large-scale native riparian trees and shrubs to identify the river's location from the highway.
- To create visual interest, the building massing should vary in form and façade and avoiding repetition and monotonous walls. Building levels and planes should vary to create visual interest and to help define view corridors. To maximize view corridors to the river, the upper levels of the structure to diminish in size to create a slimmer silhouette than the lower levels of the structure. The building width facing the river at and above 70 feet in height above finish grade should be reduced by a minimum of 30 percent of the width of the building at the ground floor fronting the river.
- Fences and walls should provide screening without visually walling-off the River Corridor Area. Within the 10-foot building setback from the River Corridor Area, the following fences and walls should be consistent with the following:
    - Solid fences or walls not exceeding 3 feet in height.
    - Fences or walls of 6 feet in height that are 75 percent open/transparent.
    - A combination of a 3 feet solid fence or wall topped with a 3 foot fence or wall that is 75 percent open/transparent.
    - For purposes of this section chain link fencing does not qualify as a 75 percent open fence.

  Chain link fencing should not be used in the 10-foot building setback and used only within landscape areas where plant material can screen the chain link and the chain link fence should have a green or black vinyl covering.

5.10.2 Significance Determination Thresholds

Based on the City of San Diego's CEQA Significance Determination Thresholds, a significant visual effect and neighborhood character impact would occur if implementation of the proposed FPA would result in:

- *A substantial obstruction of any vista or scenic view from a public viewing area s identified in the community plan;*
- *The creation of a negative aesthetic site or project;*
- *Project bulk, scale materials, or style which would be incompatible with surrounding development;*
- *Substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area;*
- *The loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan;*
- *Substantial change in the existing landform; and/or,*
- *Substantial light or glare, which would adversely affect daytime or nighttime view in the area.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.10.3 Issue 1: Public Views

Issue 1: Would the proposed FPA create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

5.10.3.1 Impact Analysis

There are no public viewsheds currently identified in the Community Plan. However, new viewing areas could be created through new development. The proposed FPA would amend some of the land uses within the proposed FPA area from commercial and industrial to mixed-use transit-oriented development. The Navajo Community Plan does not contain any designated scenic viewpoints; however, the plan objectives and goals are to maintain viewsheds towards the natural canyons, Mission Trails Regional Park, and San Diego River. Mixed-use transit-oriented development land uses would allow for taller, more dense development than the existing industrial and commercial structures. The existing landform of the area is relatively flat in nature, which results in the any existing public viewsheds being blocked by single- and two-story horizontally-dominating industrial and commercial structures. The proposed FPA would provide the opportunity for new public viewsheds view corridors to be createdexposed because the new structures would be designed to be more vertical in nature and allow for greater visibility from higher stories, and for widened view corridors through a planting zones and expanded pedestrian walkways throughout the FPA area through the Navajo Community Plan – Grantville CPIOZ Section Supplemental Design Regulations. Since the proposed land use amendments would cater to mixed use transit oriented development, it is

~~anticipated that the outdoor public use areas would be expanded and the aesthetic appearance would be enhanced with fresh hardscape and landscaping.~~

Views towards the San Diego River from most areas of the community and buildings are currently obstructed by industrial and commercial structures, which restrict active uses along the river. The presence and overgrowth of non-native vegetative species within the river valley further contributes to the disconnection of the San Diego River and the Navajo community. The proposed FPA would allow for development that caters to the co-existence of the San Diego River, Mission Trails Regional Park and the Navajo Community by providing outlets to the river from the community. The proposed FPA would provide the ability for landscaping and hardscaping that would enhance the opportunities for public viewpoints within the community and would provide for development that caters to the natural beauty of the canyonscape. Furthermore, the proposed FPA has the potential to allow the opportunity for some public viewsheds to be exposed and could improve the existing viewing opportunities throughout the community.

~~Additionally, as future development activities proceed within the proposed FPA area, each individual development proposal shall be reviewed for compliance with the development standards of the Land Development Code and the adopted design guidelines of General Plan Urban Design Element, Navajo Community Plan, and San Diego River Park Master Plan.~~ The Navajo Community Plan does not currently identify any existing public view sheds. As such, the implementation of the proposed FPA would not create any substantial obstruction of any vista or scenic view from a public viewing area ~~as identified in the community plan~~, and impacts would be less than significant.

5.10.3.2 Significance of Impact

Given the existing visibility conditions and the policies proposed to improve views within the community, the proposed FPA would not substantially alter or block public views from critical view corridors, designated open space areas, public roads, or public parks. Furthermore, the future land use and development plans consistent with the proposed FPA would potentially open up various view corridors within the community that are currently blocked by horizontal industrial and commercial development. Additionally, ~~each individual~~ any development proposal within the proposed FPA shall be reviewed for compliance with the development standards of the Land Development Code, General Plan Urban Design Element, Navajo Community Plan, and San Diego River Park Master Plan. Because the implementation of the proposed FPA would not create any substantial obstruction of any vistas or scenic views from any public viewing areas (as identified in the community plan), impacts are considered less than significant.

5.10.3.3 Mitigation Framework

The implementation of the proposed FPA would not create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan; therefore, no mitigation measures would be required.

5.10.3.4 Significance after Mitigation

No mitigation would be required and public view impacts would be less than significant.

5.10.4 Issue 2: Aesthetic Appearance

Issue 2: Would the proposed FPA result in the creation of a negative aesthetic site or project?

5.10.4.1 Impact Analysis

Due to the age and declining physical condition of the industrial properties within the proposed FPA, the Navajo Community Plan has planned a mixed-use area along the western side of Mission Gorge Road. The mixed-use area was identified as prime for neighborhood revitalization with a mix of employment, commercial, higher density residential, and civic uses. A shift in land uses to accommodate this mixed-use development would allow many of the properties containing outdated and blighted buildings and uses to be updated and better utilized. The proposed FPA would supplement the existing community plan to encourage transit-oriented development, which would also allow for updated, sustainable development and better utilization of the land. The FPA proposes some of the existing land uses be amended from commercial and industrial to mixed-use, transit-oriented development. The proposed land use amendments would allow for the future development of areas experiencing blight. The future development of this area would provide new development that would capitalize on the existing transit station that exists at the heart of the proposed FPA area; thus providing a more pedestrian-oriented community and include appropriate landscaping and hardscaping for public use. The proposed FPA would provide the opportunity to benefit the existing aesthetic appearance of the Grantville community area.

Additionally, as future development activities proceed within the proposed FPA area, ~~each individual~~ any development proposal would be reviewed for compliance with the development standards of the Land Development Code, ~~and the adopted design guidelines of~~ the General Plan – Urban Design Element, supplemental design regulations of the Navajo Community Plan – Grantville CPIOZ Section, and San Diego River Park Master Plan. ~~The objectives and recommendations of these policy documents, which are discussed above, provide guidelines~~ ~~which~~ The standards and regulations above are applicable to the proposed FPA and would ~~be adhered~~require compliance in order to process ministerially through the permit process. ~~to upon future development within the proposed FPA area~~. As such, implementation of the proposed FPA would not result in the creation of a negative aesthetic site. Impacts would be less than significant.

5.10.4.2 Significance of Impact

Future development consistent with the proposed FPA would provide new development that would capitalize on the existing transit station that exists at the heart of the proposed FPA area; thus providing a more pedestrian-oriented community and include appropriate landscaping and hardscaping for public use. The proposed FPA would provide the opportunity to benefit the existing aesthetic appearance of the community area. ~~Additionally, each individual~~Any development proposal within the proposed FPA would be reviewed for compliance with the development standards of the Land Development Code, ~~and the adopted design guidelines of~~ the General Plan Urban Design Element, supplemental design regulations of

the Navajo Community Plan – Grantville CPIOZ Section, and San Diego River Park Master Plan. As such, implementation of the proposed FPA would not result in the creation of a negative aesthetic site. Impacts would be less than significant.

5.10.4.3 Mitigation Framework

The proposed FPA would not result in the creation of a negative aesthetic site or project; therefore, no mitigation measures would be required.

5.10.4.4 Significance after Mitigation

No mitigation would be required, as a less than significant impact related to aesthetic appearance has been identified with implementation of the proposed FPA.

5.10.5 Issue 3: Bulk and Scale

Issue 3: Would the proposed FPA's bulk, scale, materials or style be incompatible with the surrounding development?

5.10.5.1 Impact Analysis

The proposed FPA includes land use changes from commercial and industrial to mixed-use residential. The proposed land use amendments would allow the opportunity for development with altered bulk, scale, materials and style from the existing structural characteristics. This variation in bulk, style, scale, and materials is critical for the future development of the area to create a mixed-use pedestrian-oriented residential area. The area is surrounded with existing residential uses, which would more appropriately aesthetically blend with the proposed FPA. Additionally, the proposed FPA would facilitate the opportunity for development that addresses the needs of the student population that attends nearby San Diego State University by providing housing, shopping, and public spaces. The proposed FPA would change the existing immediate development's bulk, scale, materials, and style, and would more appropriately blend with the surrounding community's residential and institutional land use type and style.

Additionally, as future development activities proceed within the proposed FPA area, ~~each individual~~ any development proposal would be reviewed for compliance with the development standards of the Land Development Code and the ~~adopted design guidelines of~~ General Plan, Navajo Community Plan, and San Diego River Park Master Plan. Therefore, the proposed FPA would result in a less than significant adverse impact to the existing bulk and scale within the area.

5.10.5.2 Significance of Impact

The proposed FPA would change the existing development's bulk, scale, materials, and style. The supplemental design regulations in the Grantville CPIOZ Section include specific design strategies to reduce bulk, scale, and increase materials and styling of new development. ~~and, thus, would more appropriately support the surrounding existing residential and institutional uses;~~ Therefore, the proposed FPA would result in a less than significant adverse impact to bulk and scale. With the policies and

supplemental design regulations identified in the Grantville CPIOZ section of the Navajo Community Plan, new development would create opportunities for transit-oriented, walkable, bikeable, mixed-use centers for residents and visitors.

5.10.5.3 Mitigation Framework

The proposed FPA would result in a less than significant adverse impact to bulk and scale; therefore, no mitigation measures would be required.

5.10.5.4 Significance after Mitigation

The proposed FPA would result in a less than significant adverse impact to bulk and scale; therefore, no mitigation measures would be required.

5.10.6 Issue 4: Neighborhood Character

Issue 4: Would the proposed FPA cause a substantial alteration to the existing or planned character of the area?

5.10.6.1 Impact Analysis

The proposed FPA would alter the existing character of the man-made industrial and commercial structures of the immediate area, but would better blend with the surrounding residential and institutional uses of the area. Also, the proposed FPA would not alter the existing natural land forms of the area. The planned character of the future development would ~~be aesthetically pleasing throughout the community. With~~follow the policies and supplemental design regulations identified in the Grantville CPIOZ section of the Navajo Community Plan, new development would create opportunities for transit-oriented, walkable, bikeable, mixed-use centers for residents and visitors. The proposed FPA would transition the area, which is primarily made up of older industrial and commercial structures, to allow for new mixed-use residential pedestrian-friendly development. The area is primarily developed and the overall topographical and natural land forms would remain unchanged. There are over 700 acres of scenic canyons, including Mission Gorge, which are dominant topographical features of the Navajo Community (City, 2012). These topographical features which characterize the community would remain; therefore, the proposed FPA would provide the opportunity for improvements and enhancements to character throughout the existing community.

Additionally, as future development activities proceed within the proposed FPA area, ~~each individual~~ any development proposal would be reviewed for compliance with the development standards of the Land Development Code, General Plan, Navajo Community Plan, and San Diego River Park Master Plan. The proposed FPA would create a substantial alteration to the existing character of the area. However, the proposed FPA would make the character consistent with the City of San Diego General Plan goal for Urban Villages and Grantville. As such, the proposed FPA would not adversely impact the existing character of the community and a less than significant ~~adverse~~ impact is anticipated for neighborhood character. The proposed FPA would substantially alter the existing character of the area if new development occurs. The

new development can be processed ministerially if in conformance with the policies and supplemental design regulationsof the Grantville CPIOZ Section of the Navajo Community Plan. If not in conformance, future development will be processed through a discretionary process.

5.10.6.2 Significance of Impact

Future development that would be facilitated by the proposed FPA is anticipated to provide a benefit to the neighborhood character. The proposed FPA focuses on creating a walkable, bikeable, mixed use, transit-oriented neighborhood that plans for wide, enhanced sidewalks, streetscape furnishings, and bicycle amenities throughout Grantville. ~~In addition, all future development would comply with the development standards of the Land Development Code and the adopted design guidelines of the General Plan, Navajo Community Plan, and San Diego River Park Master Plan.~~ Therefore, the implementation of the proposed FPA would result in a less than significant adverse impact to neighborhood character.

5.10.6.3 Mitigation Framework

The proposed FPA would pose a less than significant ~~adverse~~ impact to neighborhood character; therefore, no mitigation measures would be required.

5.10.6.4 Significance after Mitigation

No mitigation measures would be required. The proposed FPA would result in a less than significant adverse impact to neighborhood character.

5.10.7 Issue 5: Light and Glare

Issue 5: Would the proposed FPA create a substantial amount of light or glare that would adversely affect daytime or nighttime views?

5.10.7.1 Impact Analysis

As future development occurs in the proposed FPA area, the potential for light and glare would increase on a localized basis. Additional lighting sources may be introduced into areas which currently have less lighting and nighttime activities. Future development has the potential to increase the overall effect of nighttime lighting within and adjacent to the proposed FPA area. Additionally, glare from building surfaces would increase if future development proposals within the proposed FPA area include the construction of buildings with greater reflective surfaces.

Because the proposed FPA area is generally urban, future development activities are not anticipated to result in a significant increase in light and glare in the area. The proposed FPA would allow for future development, which would be required to comply with City development standards that address lighting and compatibility of lighting with surrounding land uses.

Additionally, as future development activities proceed within the proposed FPA area, each individual development proposal would be reviewed for compliance with the development standards of the Land

Development Code, General Plan, Navajo Community Plan, and San Diego River Park Master Plan. Therefore, impacts associated with an increase in light and glare are considered less than significant.

5.10.7.2 Significance of Impact

The proposed FPA would allow for future development which would be required to comply with City development standards that address lighting~~ and compatibility of lighting with surrounding land uses~~. Therefore, impacts associated with an increase in light and glares are considered less than significant.

5.10.7.3 Mitigation Framework

The proposed FPA would result in a less than significant impacts resulting form light and glare; therefore, no mitigation measures are required.

5.10.7.4 Significance after Mitigation

No mitigation measures are required. The proposed FPA would result in a less than significant impacts resulting from light and glare.

5.10.8 Conclusion

Implementation of the proposed FPA would result in less than significant impacts related to visual effects and neighborhood character. As future development activities proceed within the proposed FPA area, ~~each individual~~ any development proposal would be reviewed for compliance with the development standards of the Land Development Code~~, and the adopted design guidelines of the~~ General Plan - Urban Design Element, Navajo Community Plan, and San Diego River Park Master Plan.

5.11 Geologic Conditions

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with geologic conditions. Information contained in this section is summarized from the ***Geology and Soils Evaluation for the Grantville Focused Plan Amendment***, prepared by Ninyo & Moore, dated May 12, 2014 (Appendix I of this PEIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix I, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix I, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.11.1 Existing Conditions

5.11.1.1 Site Topography

The majority of the proposed FPA area is located in the San Diego River Valley. The southern portion of the proposed FPA area is located within the Alvarado Creek drainage. The elevation along the San Diego River is approximately 80 feet above mean sea level (AMSL). Elevations of the eastern limits of the proposed FPA area near Mission Gorge Place are approximately 100 feet AMSL. Elevations of the southern limits of the proposed FPA area near Interstate 8 are approximately 300 feet AMSL.

5.11.1.2 Regional Geologic Setting

The proposed FPA area is situated in the in the coastal foothill section of the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges encompasses an area that extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin south to the southern tip of Baja California. The province varies in width from approximately 30 to 100 miles. In general, the province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the southern California batholith. The Peninsular Ranges Province is traversed by a group of sub-parallel faults and fault zones trending roughly northwest. Several of these faults are considered active. The Elsinore, San Jacinto and San Andreas faults are active fault systems located northeast of the proposed FPA area and the Rose Canyon, Coronado Bank, San Diego Trough, and San Clemente faults are active faults located west of the proposed FPA area. Major tectonic activity associated with these and other faults within the regional tectonic framework consists primarily of right-lateral, strike-slip movement.

5.11.1.3 Geologic Units

Geologic mapping indicates that the near-surface geology at the proposed FPA area includes the geologic units listed below. However, based on field reconnaissance conducted by Ninyo & Moore (2014), developed portions of the proposed FPA area are generally underlain by fill associated with the development of individual parcels. Figure 5.11-1 shows the geologic units and their respective locations. A brief description of the geologic units expected to be present in the proposed FPA area is included below.

A. Fill

Existing fills in the proposed FPA area are expected to consist of engineered and undocumented fills, derived from nearby formational and surficial units. Fill soils can vary from clay to sand, depending on the parent material. The compaction of the fills can vary considerably, ranging from loose to dense.

B. Qya: Young Alluvial Flood-Plain Deposits (Holocene and late Pleistocene)

Qya consists of poorly sorted, poorly consolidated, permeable flood-plain deposits of sand, silt, or clay. Scattered layers of gravel and cobbles are also likely to be present within the alluvium. The alluvium is generally in a loose condition and much of it would be subject to liquefaction below the water table. In developed parts of the western portion of the proposed FPA area, alluvium is likely to be present below existing fill soils.

~~**C. Qyc: Young Colluvial Deposits (Holocene and late Pleistocene)**~~

~~Qyc consists of poorly sorted and poorly consolidated sand and silt slope wash deposits. These deposits are expected to also contain gravel and cobbles. They are also expected to be generally in a loose condition.~~

~~D~~C. Qoa: Old Alluvial Flood-Plain Deposits (late to middle Pleistocene)

Qoa consists of poorly sorted, well consolidated, permeable, commonly slightly dissected gravel, sand, silt, and clay.

~~**E. Tmv: Mission Valley Formation (middle Eocene)**~~

~~Tmv consists of predominantly light olive gray, soft, friable, fine- to medium-grained marine and non-marine sandstone containing cobble conglomerate tongues. These materials may be slightly to moderately cemented.~~

~~**F. Tst: Stadium Conglomerate (middle Eocene)**~~

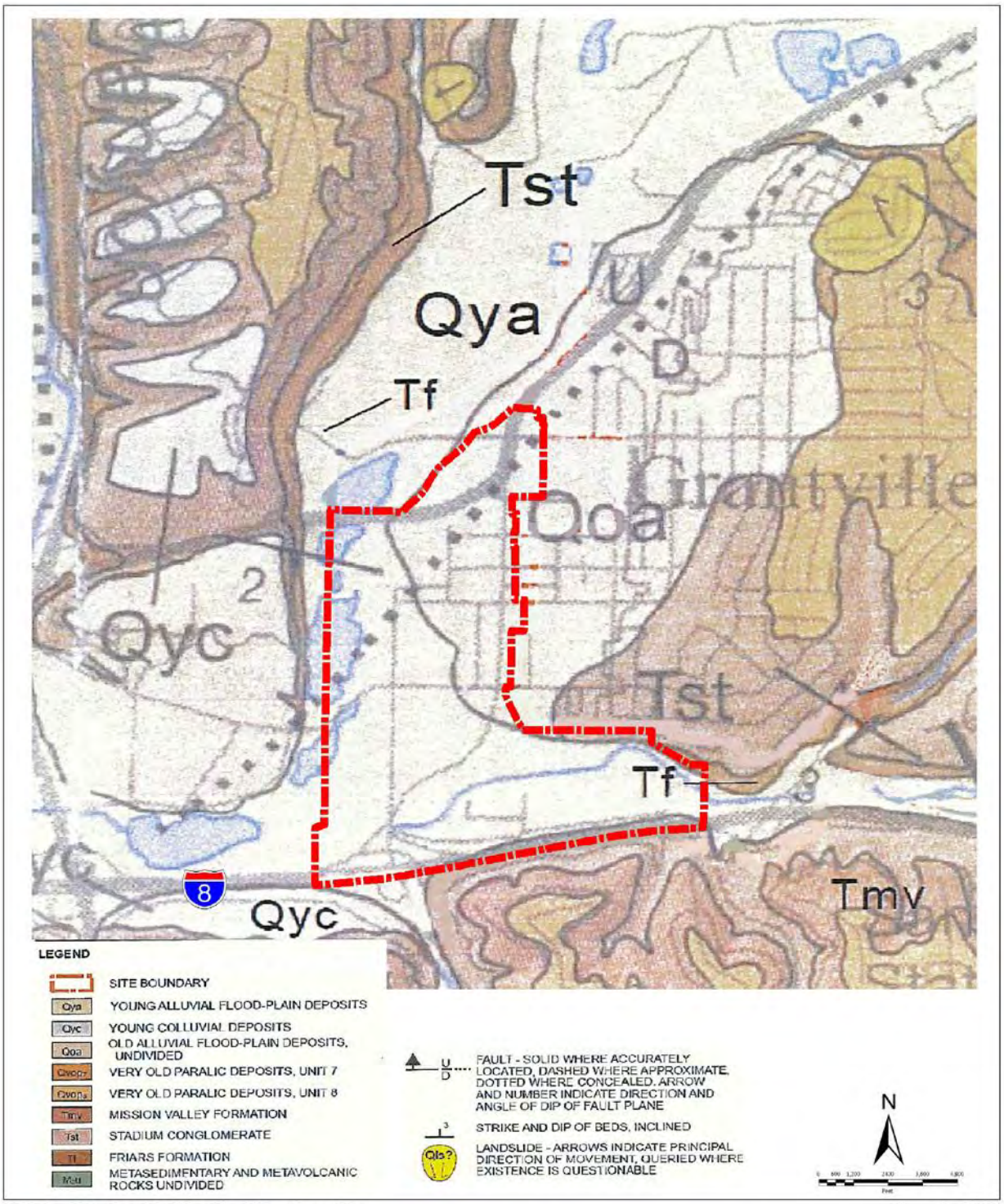
~~Tst consists of massive cobble conglomerate with dark yellowish brown, coarse-grained sandstone matrix. These materials may be moderately cemented.~~

~~**G. Tf: Friars Formation (middle Eocene)**~~

~~Yellowish gray, medium-grained, massive, poorly indurated non-marine lagoonal sandstone and claystone with tongues of cobble conglomerate. These materials may be moderately cemented.~~

5.11.1.4 Groundwater

Sources provided by the California Department of Water Resources (DWR) and the California State Water Resources Control Board (SWRCB) were reviewed for information pertaining to groundwater quality and occurrence in the vicinity of the proposed FPA area. According to the SWRCB Water Quality Control Plan for the San Diego Basin, the proposed FPA area is located within the Mission San Diego Hydrologic Subarea (907.11) in the San Diego Unit (907.00). Ninyo & Moore researched information on the SWRCB GeoTracker website for properties with wells located in proximity to the proposed FPA area and found that several DWR wells are located within the proposed FPA area. Based on the research, groundwater is present at relatively shallow depths (as shallow as nine feet below the adjacent surface) throughout the proposed FPA area. The monitoring wells located within the proposed FPA area have measured groundwater depths ranging from 9 to 47 feet below the surface. Specifics of the groundwater data obtained can be seen in



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

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Geologic Map

FIGURE 5.11-1

the *Geology and Soils Evaluation*. Based on the topography of the proposed FPA area and its proximity to the San Diego River and Alvarado Creek, groundwater beneath the proposed FPA area is presumed to flow generally in a westerly direction. Groundwater levels can fluctuate due to seasonal variations, groundwater withdrawal or injection, and other factors.

5.11.1.5 Geologic Hazards

The proposed FPA area is located within geologic hazard zones 23, 31, ~~32~~and~~,~~ 52, ~~and 53~~ as designated on the City of San Diego Seismic Safety Study Geologic Hazards Maps and as shown on Figure 5.11-2. A brief description of each geologic hazard zone located within the proposed FPA area is included below.

- **Zone 23** is characterized by the Friars Formation with neutral or favorable geologic structure. The Friars Formation is considered to be a slide-prone formation.
- **Zone 31** is characterized by a high potential for liquefaction, shallow groundwater, major drainages, and hydraulic fills.
- ~~**Zone 32** is characterized by a low potential for liquefaction, fluctuating groundwater, and minor drainages.~~
- **Zone 52** is characterized by other level areas, gently sloping to steep terrain with favorable geologic structure and low risk.
- ~~**Zone 53** is characterized by level or sloping to steep terrain with unfavorable geologic structure and low to moderate risk.~~

A. Faulting and Seismicity

The proposed FPA area is considered to be seismically active due to several active faults located within the region. However, according to the City of San Diego Seismic Safety Study (2008) and as shown on Figure 5.11-1, there are no known faults that cross the proposed FPA area. The closest known major active fault is the Rose Canyon Fault, which is capable of generating an earthquake magnitude of 7.2. The Rose Canyon Fault is located approximately four miles west of the proposed FPA area, and is shown on Figure 5.11-2. In general, hazards associated with seismic activity include strong ground motion, ground surface rupture, liquefaction, and tsunamis, which are discussed below.

Strong Ground Motion

According to the 2010 *San Diego County Multi-Jurisdiction Hazard Mitigation Plan*, one way to express an earthquake's severity is to compare its acceleration to the normal acceleration due to gravity. The acceleration due to gravity is often called "g". A 100% g earthquake is very severe. More damage tends to occur from earthquakes when ground acceleration is rapid. Peak ground acceleration (PGA) is a measure of the strength of ground movement. PGA measures the rate in change of motion relative to the established rate of acceleration due to gravity (980 cm/sec/sec). PGA is used to project the risk of damage from future earthquakes by showing earthquake ground motions that have a specified probability (10%, 5%, or 2%) of being exceeded in 50 years. These ground motion values are used for reference in construction design for earthquake resistance. The ground motion values can also be used to assess relative hazard between sites, when making economic and safety decisions.

The proposed FPA area modified PGA Maximum Considered Earthquake is an estimated 0.49g using the United States Geological Survey (USGS) ground motion calculator. The design PGA was 0.33g using the USGS ground motion calculator. These estimates of ground motion do not include near-source factors that may be applicable to the design of structures on site. The seismic design criteria for future structures in the FPA area should be further evaluated through site specific geotechnical investigation including subsurface and laboratory evaluation.

Ground Surface Rupture

Based on a review of geologic literature, active faults are not known to cross the FPA vicinity. Therefore, the potential for ground rupture due to faulting at the site is considered low. However, lurching or cracking of the ground surface as a result of nearby seismic events is possible.

Liquefaction and Seismically Induced Settlement

Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction.

Based on the shallow groundwater table and relatively loose granular nature of the subsurface materials, portions of the proposed FPA area underlain by alluvium (or fills over alluvium) have a high potential for liquefaction in the event of a nearby seismic event. Based on the relatively dense nature of the subsurface materials on portions of the proposed FPA area further away from the drainages of the San Diego River and Alvarado Creek, the potential for liquefaction is not a design consideration in these areas.

Liquefaction hazards are mapped by the City of San Diego, and according to the City of San Diego Seismic Safety Study, portions of the proposed FPA area are mapped as Category~~ies~~ 31~~ and 32~~. Areas mapped as Category 31 are defined as having a high potential for liquefaction~~, and areas mapped as Category 32 are defined as having a low potential for liquefaction.~~

B. Tsunamis

Tsunamis are long wavelength seismic sea waves (long compared to the ocean depth) generated by sudden movements of the ocean bottom during submarine earthquakes, landslides, or volcanic activity. Based on the inland location and elevation of the proposed FPA area, the potential for a tsunami is not considered a design constraint.

C. Landsliding

Landslide hazards are mapped both by the State of California and the City of San Diego. According to the State of California, the majority of the proposed FPA area is classified as being marginally susceptible to landsliding (Designation 2). However, some portions of the proposed FPA area are classified as being generally susceptible or most susceptible to landsliding (Designations 3-1 or 4-1). The eastern portion of the proposed FPA area (along Waring Road) is classified as being most susceptible to landsliding. According to the City of San Diego Seismic Safety Study, portions of the proposed FPA area are mapped as having a low risk for landsliding (Category 52). ~~However, some portions of the proposed FPA area are defined as having a low to moderate risk for landsliding (Category 53).~~

D. Flood Hazards

Based on review of Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), the low-lying areas near the San Diego River and Alvarado Creek are within 100- and 500-year floodplains. Based on this review and our site reconnaissance, the potential for significant flooding for parcels located near the San Diego River and Alvarado Creek is high.

E. Expansive Soils

Expansive soils generally result from clay minerals that have the capacity to shrink or swell in response to changes in moisture content. Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures, including tilting and cracking. Review of regional geologic maps, geologic reconnaissance, and site-specific subsurface exploration at the proposed FPA area, indicates that the near surface soils consist predominately of cobbles, gravel, sand, silt, and clay. The soils at the proposed FPA area have a low to moderate potential for expansion.

F. Corrosive Soils

Caltrans corrosion criteria define corrosive soils as soils with more than 500 parts per million chlorides, more than 0.2% sulfates, or a pH less than 5.5. Soil corrosivity testing was not performed for the FPA in preparation for this specific project. Based on laboratory testing performed on soil samples during previous Ninyo & Moore projects elsewhere in the area, and Caltrans corrosion criteria, those soils were not classified as corrosive. However, there is the potential for corrosive soils to occur through the proposed FPA area, in particular, on parcels in close proximity to the San Diego River.

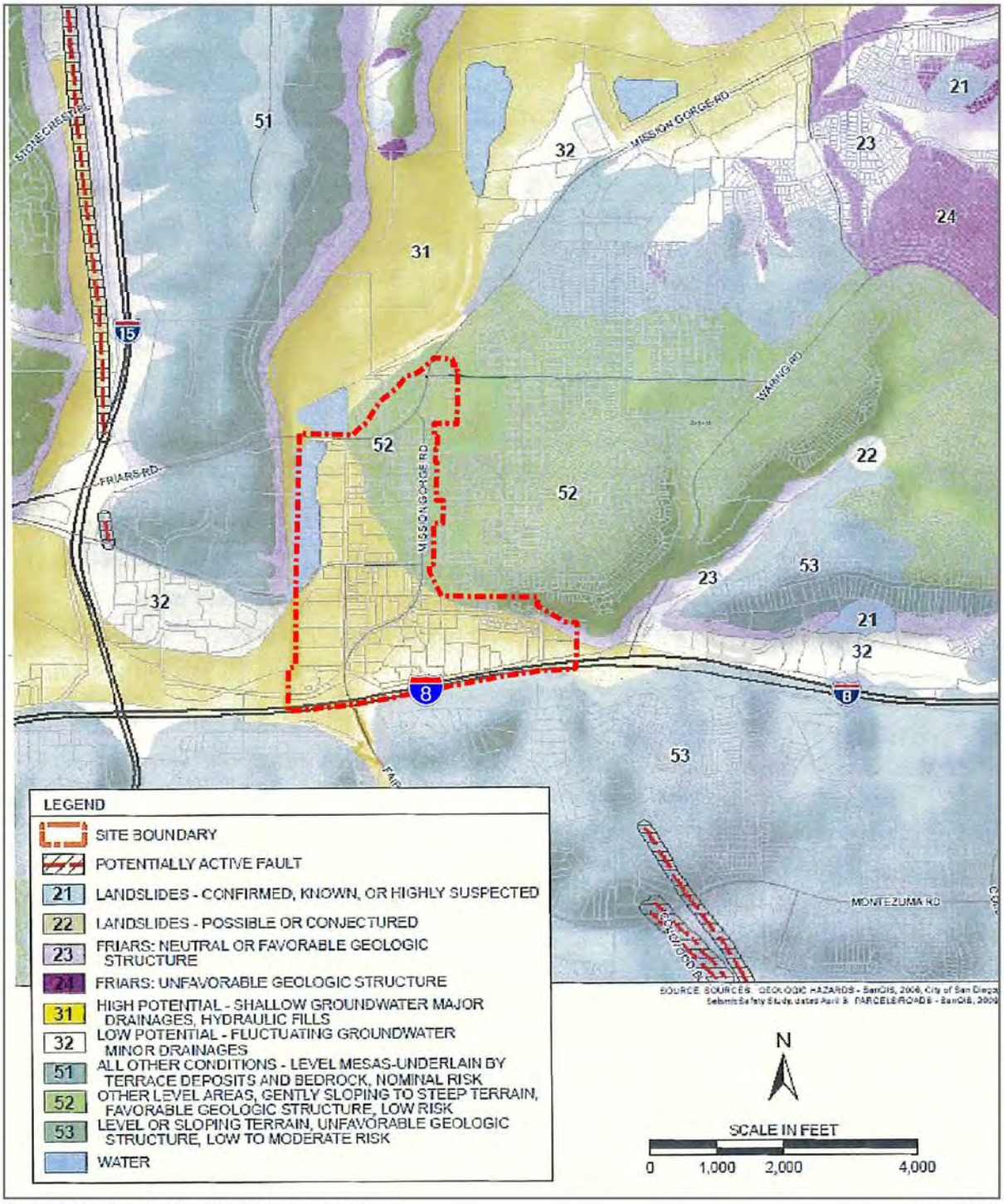
G. Agricultural Soils

Based on the Soil Survey for the San Diego Area, several different soil series have been mapped in the proposed FPA area. These soil types and their characteristics are summarized in Table 5.11-1 below. The potential for loss of agricultural soils due to further development of the study area is considered negligible since the majority of the proposed FPA area has been extensively developed and is no longer in its natural state. The potential for loss of agricultural soils due to development are a concern in undeveloped areas such as those directly adjacent to the San Diego River.

Table 5.11-1
Proposed FPA Area Soil Series Characteristics

Soil Series	Use	Erosion Potential
Huerhuero loam (HrC)	Range, irrigated truck crops, tomatoes, and flowers	Slight to Moderate
Huerhuero urban land complex (HuC)	Range, irrigated truck crops, tomatoes, and flowers	Slight to Moderate
Made land (Md)	Building sites	N/A
Olivenhain cobbly loam (OhF)	Range and watershed	High
Riverwash (Rm)	Farming, ranching, sand and gravel	N/A
Terrace Escarpments (TeF)	Watershed	N/A
Tujunga sand (TuB)	Range and golf courses	Slight

Source: Ninyo & Moore, 2014.



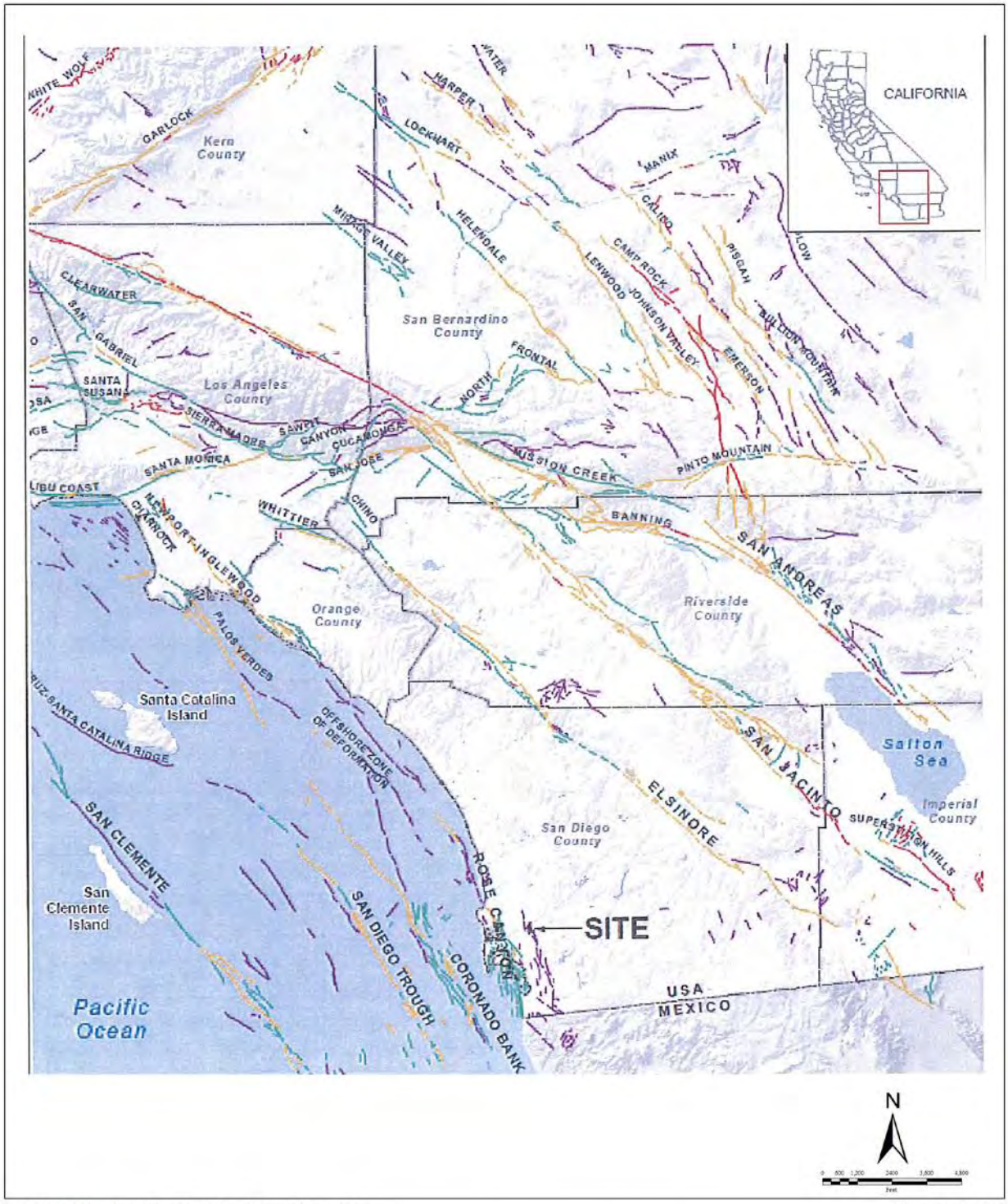
SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 August 2014

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Geologic Hazards

FIGURE 5.11-2



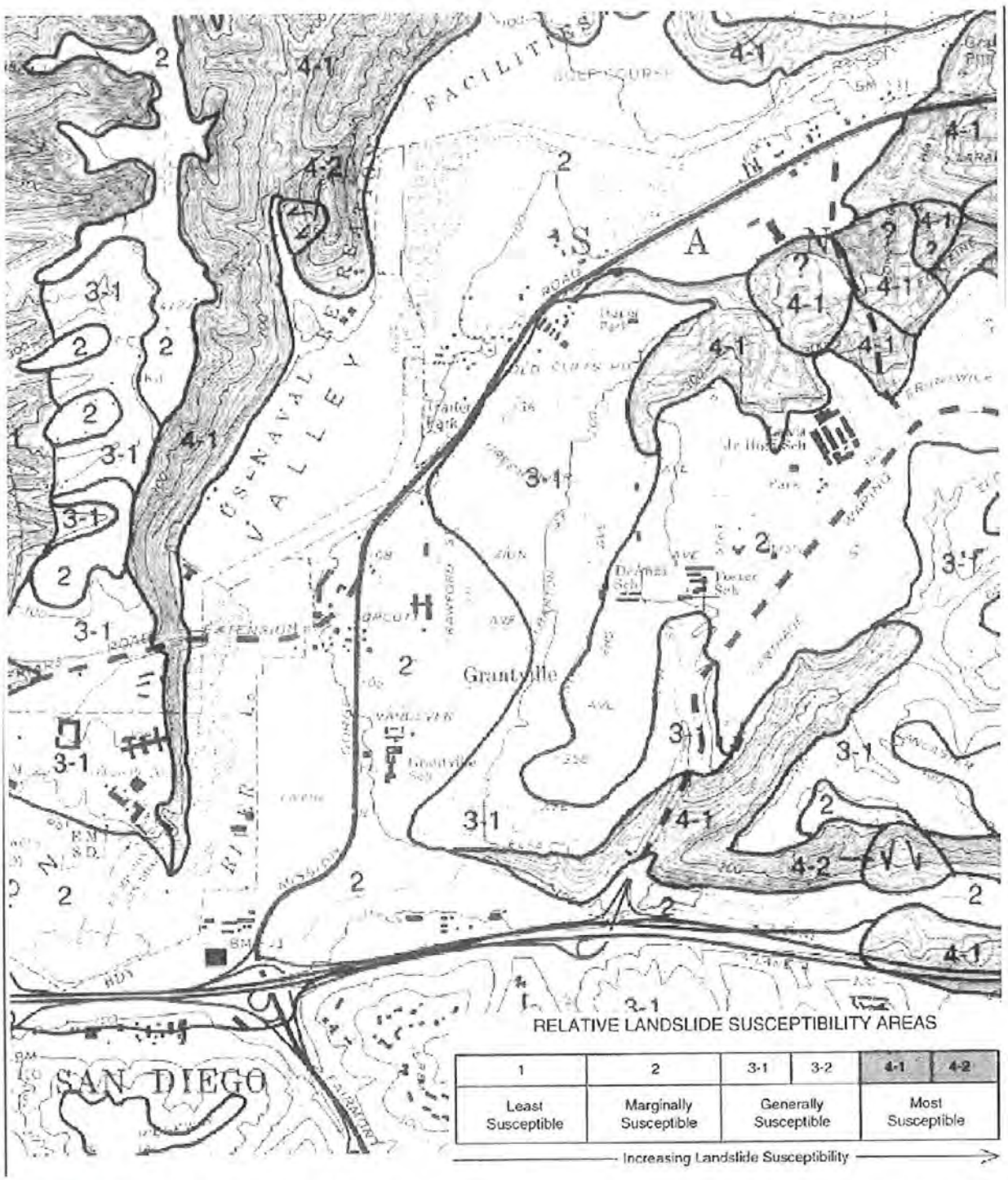
SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

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Fault Locations

FIGURE 5.11-3



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014

November 2014

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Landslide Hazards

FIGURE 5.11-4

5.11.1.6 Mineral Resources

According to the California Geological Survey Open File Report 96-04, areas mapped as Mineral Resource Zone 2 and 3 (MRZ-2 and MRZ-3) have been mapped in the proposed FPA area. Areas mapped as being in MRZ-2 are considered to have extractable aggregate deposits. Areas mapped as being in MRZ-3 contain mineral deposits that may qualify as mineral resources. Based on a review of referenced data, the proposed FPA area is in an urban area where the potential for loss of mineral deposits due to further development is considered low.

5.11.1.7 Regulatory Framework

A. 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. A detailed geologic investigation must be prepared prior to receiving a permit in an area extending 100 feet on both sides of known potentially and recently active earthquake fault zone traces (City, 2008).

B. City of San Diego Seismic Safety Study (SDSSS)

The SDSSS is a series of maps indicating likely geologic hazards throughout the City. The maps do not provide site-specific information; they are to be used as a guide to determine relative risk. The SDSSS identifies areas prone to liquefaction and earthquake-induced landslides as Zones of Required Investigation, which require a report of the geotechnical condition prior to obtaining a permit (City, 2008). The level of technical geological study is dependent on the following:

- The type of permit being sought (e.g., land-planning, land-development, and/or building);
- Geological hazard category;
- The building type/land use group; and,
- Relative risk.

When required, the geologic technical report will either consist of a preliminary study, a geologic reconnaissance, or an in-depth geologic investigation report that includes fieldwork and analysis. The geologic reconnaissance report and the geologic investigation report shall include all pertinent requirements as established by the Building Official. In addition, the Building Official may require a geologic reconnaissance report or a geologic investigation report for any site if the Building Official has reason to believe that a geologic hazard may exist at the site. Section 145.1803 of the SDMC discusses in more detail the requirements related to the geotechnical report outlined in the SDSSS.

C. 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. The following are relevant excerpts from this element:

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.

PF-Q.2 Maintain or improve integrity of structures to protect residents and preserve communities.

a. 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 socioeconomic consequences of the attendant relocation and housing programs.

b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.

c. 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.

5.11.2 Significance Determination Thresholds

Based on the City of San Diego's CEQA Significance Determination Thresholds, impacts related to geologic conditions would be significant if the proposed FPA would:

- *Result in the exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure or similar hazards;*
- *Result in a substantial increase in wind or water erosion of soils, either on or off the site; and/or,*
- *Result in allowing structures to be located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.11.3 Issue 1: Geologic Hazards

Issue 1: Would the proposed FPA expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

5.11.3.1 Impact Analysis

As discussed above, the City of San Diego General Plan contains numerous goals and policies in relation to geologic hazards which promote the implementation of seismically safe development requirements for fault zones; design publicly accessible open space in areas of active faults where development cannot take place; and promote interagency coordination for tsunami events. The relevant excerpts of this element were described above. Additionally, all future projects implemented under the proposed FPA would be required to comply with the San Diego Municipal Code (SDMC), the California Building Code (CBC), and the applicable General Plan policies described above.

A. Surface/Fault Rupture and Ground Shaking

The proposed FPA area is considered to be seismically active due to the several active faults located within the region. According to the City of San Diego Seismic Safety Study (2008) and as shown on Figure 5.11-1, there are no known faults that cross the proposed FPA area. Therefore, the potential for ground rupture due to faulting at the site is considered low. However, the closest known major active fault is the Rose Canyon Fault, which is located approximately 4 miles west of the site. The Rose Canyon Fault has the potential to generate a magnitude 7.2 earthquake. As such, subsequent land use activities associated with the implementation of the proposed FPA have a moderate potential for exposure to strong ground motion, lurching, or cracking of the ground surface resulting from seismic events on nearby active faults.

The Seismic Hazards Mapping Act requires that cities use the Seismic Hazard Zone Maps in their land use planning and building permit processes. It also requires that site-specific geotechnical investigations be conducted within the Zones of Required Investigation in order to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. If surface rupture hazards are identified, the use of structural setbacks or similar measures would be used.

All new development proposed within the proposed FPA area would be required to comply with the SDMC and the CBC, which include design criteria for seismic loading and other geologic hazards. This includes design criteria for geologically induced loading that governs sizing and structural members and provides calculation methods to assist in the design process. Thus, while surface/fault rupture and ground shaking impacts could be potentially damaging, they would also tend to be reduced and their effects minimized during the design process due to the SDMC regulations and CBC criteria. The CBC includes provisions for buildings to structurally survive an earthquake without collapsing and includes measures such as anchoring to the foundation and structural frame design. As such, compliance with the SDMC and the CBC would ensure that people, structures, and infrastructure are not adversely impacted by seismic hazards related to surface/fault rupture and ground shaking. Therefore, impacts related to surface rupture hazards would be considered less than significant with the implementation of the proposed FPA.

B. Tsunamis

Based on the inland location and elevation of the proposed FPA area, there are no potential impacts associated with tsunamis.

C. Landslides and Mudslides

Landslide and mudslide hazards are mapped both by the State of California and the City of San Diego, and no landslides or mudslides have been mapped in the proposed FPA area. According to the City of San Diego, the majority of the proposed FPA area is mapped as having a low risk for landsliding (Category 52). ~~However, some portions of the proposed FPA area are mapped as having a low to moderate risk for landsliding (Category 53)~~ (City of San Diego, 2008).

According to the State of California, the majority of the proposed FPA area is classified as being marginally susceptible to landsliding (Designation 2). The eastern portion of the proposed FPA area is classified as being most susceptible to landsliding, and is shown on Figure 5.11-4 below. All new development within the proposed FPA area would be required to comply with the SDMC and CBC, which would ensure that potential impacts associated with landslides and mudslides would be less than significant.

D. Flood Hazards

Based on review of FEMA Flood Maps, the low-lying areas near the San Diego River and Alvarado Creek are within 100- and 500-year floodplains. As such, the potential for significant flooding for parcels located in close proximity to the San Diego River and Alvarado Creek is considered high. However, adherence to the SDMC and CBC would ensure that potential flood hazard impacts to future developments within the proposed FPA area would be less than significant.

E. Soils

Based on previous geotechnical evaluations conducted by Ninyo & Moore in the proposed FPA area, the soils present within the FPA area are anticipated to have a low potential for expansion. In addition, corrosive soils are not anticipated to be present at the project site. However, there is still a potential for the presence of corrosive soils at parcels located adjacent to the San Diego River and Alvarado Creek. However, all new development within the proposed FPA area would be required to comply with the SDMC

and CBC, which would ensure that potential impacts associated with the potential presence of corrosive soils would be less than significant.

F. Groundwater

Based on research conducted by Ninyo & Moore, groundwater is present at relatively shallow depths, as shallow as nine feet below the adjacent surface, throughout the proposed FPA area. The monitoring wells located within the proposed FPA area have measured groundwater depths ranging from 9 to 47 feet below the surface. Based on the topography of the proposed FPA area and its proximity to the San Diego River and Alvarado Creek, groundwater beneath the proposed FPA area is presumed to flow generally in a westerly direction. A shallow groundwater table combined with the relatively loose granular nature of the subsurface materials on portions of the FPA site allows for a high potential for liquefaction in the event of a nearby seismic event. However, future developments would utilize proper engineering design and standard construction practices in order to avoid potential impacts associated with a shallow groundwater table and liquefaction. In addition, adherence to the SDMC and CBC would ensure that potential impacts would be less than significant.

5.11.3.2 Significance of Impact

A. Surface/Fault Rupture and Ground Shaking

While there are no known active faults that cross the proposed FPA area, the proposed FPA area is considered to be seismically active due to several active faults located within the region. Potential future physical development associated with proposed FPA has a moderate potential for exposure to strong ground motion, lurching, or cracking of the ground surface resulting from seismic events on nearby active faults. However, impacts related to geologic hazards would be avoided or reduced to a level less than significant through adherence to the SDMC and CBC.

B. Tsunamis

The potential for the proposed FPA to expose people or structures to tsunamis would be very low, due to the inland location and elevation of the proposed FPA area. Therefore, there would be no impacts associated with tsunamis.

C. Landslides and Mudslides

No landslides or mudslides have been mapped in the proposed FPA area, therefore the potential for landslides is considered to be low for the majority of the proposed FPA area. However, some portions of the proposed FPA area are mapped as having a low to moderate risk for landsliding. All new development within the proposed FPA area would be required to comply with the SDMC and CBC, which would ensure that potential impacts associated with landslides and mudslides would be less than significant.

D. Flood Hazards

Due to the FPA's low-lying location within the 100- and 500-year floodplains, the potential for significant flooding of parcels located in close proximity to the San Diego River and Alvarado Creek is considered

high. However, adherence to the SDMC and CBC would ensure that potential flood hazard impacts to future developments within the proposed FPA area would be less than significant.

E. Soils

Previous geotechnical investigations conducted by Ninyo & Moore in the proposed FPA area indicate that there is a low potential for the presence of expansive and/or corrosive soils to be present on-site. However, there is still a potential for the presence of corrosive soils at parcels located adjacent to the San Diego River and Alvarado Creek. However, all new developments within the proposed FPA area would be required to comply with the SDMC and CBC, which would ensure that impacts associated with the potential presence of corrosive soils would be less than significant.

D. Groundwater

Groundwater is present at relatively shallow depths, as shallow as nine feet below the adjacent surface, throughout the proposed FPA area, which could result in liquefaction in the instance of a strong seismic event. However, proper engineering design, utilization of standard construction practices, and adherence to the SDMC and CBC would ensure that potential impacts associated with a shallow groundwater table and liquefaction would be less than significant.

5.11.3.3 Mitigation Framework

Implementation of the proposed FPA would not result in significant impacts associated with the geologic hazards described above. Therefore, no mitigation measures are required.

5.11.3.4 Significance after Mitigation

No mitigation would be required; therefore, there would be no impacts after mitigation.

5.11.4 Issue 2: Soil Erosion

Issue 2: Would the proposed FPA result in a substantial increase in wind or water erosion of soils, either on or off the site?

5.11.4.1 Impact Analysis

Most of the proposed FPA area is developed and was previously graded, except for the area adjacent to the San Diego River. Implementation of the proposed FPA 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 FPA area could remove the existing pavement and cover, thereby exposing soils to potential runoff and erosion during construction. However, continued implementation of the SDMC would ensure that there are no adverse impacts from erosion and loss of topsoil. The SDMC grading regulations require extensive measures to control erosion during and after grading or construction. These include:

- Desilting basins, improved surface drainage, or planting of ground covers installed early in the improvement process in areas that have been stripped of native vegetation or areas of fill material;
- Short-term measures, such as sandbag placement and temporary detention basins;
- Restrictions on grading during the rainy season (November through March), depending on the size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and,
- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season.

Conformance to such 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, is subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this size within the City would be required to prepare and comply with an approved SWPPP that would consider the full range of erosion control BMPs, including any additional site-specific and seasonal conditions.

In addition, the RWQCB has adopted an area-wide Municipal Stormwater Permit, Order No. 2001-01, NPDES No. CAS0108758, "Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Stormwater Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County and the San Diego Unified Port District." All future development projects within the proposed FPA would need to adhere to the requirements of the MS4 permit for the San Diego Region. As such, project compliance with NPDES and MS4 permit requirements; compliance with the SDMC; and the implementation of BMPs would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development. Therefore, soil erosion impacts associated with the implementation of the proposed FPA would be less than significant.

5.11.4.2 Significance of Impact

Any future development projects would be subject to comply with the SDMC, NPDES General Construction Storm Water Permit, and MS4 Stormwater Permit, and would be required to prepare and implement a SWPPP and BMPs. Therefore, no impacts associated with wind or water erosion of soils would occur and no mitigation measures are required. Adherence to the SDMC grading regulations and construction requirements and implementation of recommendations and standards would preclude significant erosion impacts. As such, potential soil erosion impacts with the implementation of the proposed FPA are determined to be less than significant.

5.11.4.3 Mitigation Framework

Implementation of the proposed FPA would not result in significant impacts associated with soil erosion. Therefore, no mitigation measures are required.

5.11.4.4 Significance after Mitigation

No mitigation would be required; therefore, there would be no impacts after mitigation.

5.11.5 Issue 3: Geologic Stability

Issue 3: Would the proposed FPA result in allowing structures to be located on a geologic unit or soil that is unstable or that would become unstable as a result of the proposed FPA, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?

5.11.5.1 Impact Analysis

A. Seismically Induced Landslide

Landslide hazards are mapped both by the State of California and the City of San Diego, and no landslides have been mapped in the proposed FPA area. According to the City of San Diego, the majority of the proposed FPA area is mapped as having a low risk for landslides (Category 52). ~~However, some portions of the proposed FPA area are mapped as having a low to moderate risk for landsliding (Category 53)~~ (City of San Diego, 2008)~~.~~

According to the State of California, the majority of the proposed FPA area is classified as being marginally susceptible to landsliding (Designation 2). However, some portions of the proposed FPA area are classified by the State as being generally susceptible or most susceptible to landsliding (Designations 3-1 or 4-1). As depicted in Figure 5.11-4, the eastern portion of the proposed FPA area is classified as being most susceptible to landsliding. Implementation of the proposed FPA could allow for development on a geologic unit or soil that is unstable, thus creating substantial risks to life and property. However, all new development within the proposed FPA area would be required to comply with the SDMC and CBC, which would ensure that potential impacts associated with seismically induced landslides would be less than significant.

B. Liquefaction

Based on the shallow groundwater table and relatively loose granular nature of the subsurface materials on portions of the proposed FPA area underlain by alluvium, there is a high potential for liquefaction in the event of a nearby seismic event. Based on the relatively dense nature of the subsurface materials on portions of the proposed FPA area away from the drainages of the San Diego River and Alvarado Creek, the potential for liquefaction is not a design consideration in these areas.

Liquefaction hazards are mapped by the City of San Diego. Areas underlain by formational materials that are out of the low-lying valley areas have a low potential for liquefaction. However, parcels in close proximity to the San Diego River and Alvarado Creek may have a moderate to high potential for liquefaction (Category 31) (City of San Diego, 2008). With the continued implementation of the SDMC and compliance with the CBC, potential liquefaction impacts to future new development within the proposed FPA area would be less than significant.

C. Seismically Induced Settlement

Geologically, the proposed FPA area is underlain by fill (both documented and undocumented), young alluvium, young colluvium, old alluvium, and formational soils of the Mission Valley Formation, Stadium Conglomerate, and Friars Formation. Fill, young alluvium, and young colluvium are not considered suitable in their current state for support of development. The condition of these fills, young alluvium, and young colluvium soils is not known and they may be subject to settlement under foundation loads. In addition, the formational materials contain layers of cemented gravel and cobbles, which may be difficult to excavate and may impact trenching operations. However, adherence with the SDMC and CBC, per the Mitigation Framework, would ensure that potential impacts associated with seismically induced settlement within the proposed FPA area would be less than significant.

5.11.5.2 Significance of Impact

A. Seismically Induced Landslide

No landslides have been mapped in the proposed FPA area; therefore the potential for landslides is considered low over the major portions of the proposed FPA area. However, some portions of the proposed FPA area are mapped as having a low to moderate risk for landsliding. All new development within the proposed FPA area would be required to comply with the SDMC and CBC, as per the Mitigation Framework, which would ensure that potential impacts associated with seismically induced landslides would be less than significant.

B. Liquefaction

Based on the shallow groundwater table and relatively loose granular nature of the subsurface materials in portions of the proposed FPA area underlain by alluvium, there is a high potential for liquefaction in these areas in the event of a nearby seismic event. With the continued implementation of the SDMC and compliance with the CBC, potential liquefaction impacts to future new development within the proposed FPA area would be less than significant.

C. Seismically Induced Settlement

The potential for seismically induced settlement occurring at an individual project site exists due to the fill, young alluvium, and young colluvium present on site. Fill, young alluvium, and young colluvium are not considered suitable in their current state for support of development, and they may be subject to settlement under foundational loads. However, adherence with the SDMC and CBC would ensure that potential impacts associated with seismically induced settlement within the proposed FPA area would be less than significant.

5.11.5.3 Mitigation Framework

Implementation of the proposed FPA could result in significant impacts associated with the geologic instability and the associated geologic hazards described above. Unstable conditions relating to seismically induced landslides, liquefaction, and seismically induced settlement require the following mitigation measure to reduce the impacts to a less than significant level.

GC-1: Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

5.11.5.4 Significance after Mitigation

With implementation of the Mitigation Framework as detailed in GC-1, there would be no impacts after mitigation.

5.11.6 Conclusions

Portions of the proposed FPA area are located in areas potentially susceptible to the geologic hazards as described above. With the implementation of the proposed FPA, future development projects may be exposed to strong seismic shaking, landslides, shallow groundwater, liquefaction, and seismically induced settlement. However, adherence to the Mitigation Framework detailed in GC-1, which requires regulatory compliance as noted above, for future development within the proposed FPA would ensure that geologic condition impacts would be less than significant.

5.12 Paleontological Resources

This section of the PEIR discusses the potential environmental impacts of the proposed FPA to paleontological resources. As a result of the change to a smaller project area, the proposed FPA area does not include any low, medium, or high sensitivity geologic formations.

5.12.1 Existing Conditions

Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. As defined in this section, "paleontological resources" (i.e., fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of man. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Paleontological resource sensitivities are rated for individual geologic formations and recognize the important relationship between fossils and the geologic formations within which they are entombed. Figure 5.11-1 highlights the geologic conditions for the FPA. The FPA does not include any low, medium, or high sensitivity geologic formations as a result of the changed project area. ~~A high sensitivity is assigned to geologic formations known to produce vertebrate fossil remains or are considered to have the potential to produce such remains. A moderate sensitivity is assigned to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains. A marginal sensitivity is assigned to geologic formations that are composed either of pyroclastic volcanic or meta-sedimentary rocks, but which nevertheless have a limited probability of producing fossil remains from certain sedimentary lithologies at localized outcrops.~~ The FPA area has changed per 4.0 Project History Changes. This information is incorrect based on geology technical report.

~~The proposed FPA area is in the Coastal Plain region of the Peninsular Ranges Geomorphic Province, and contains several rock formations. This province is underlain by a sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of earth history. Over this period of time, the relationship of land and sea has fluctuated drastically, such that today there are ancient marine rocks preserved up to elevations of about 900 feet above mean sea level (AMSL) (City of San Diego, 2007). Each of the geologic formations found within the proposed FPA area are shown on Figure 5.11-1 in Section 5.11 – Geologic Conditions of this PEIR, and their characteristics are summarized below (Deméré & Walsh, 1994). In addition, Table 5.12-1 provides the paleontological sensitivities for each formation.~~

~~TABLE 5.12-1~~
~~Paleontological Resource Sensitivity~~

~~Geologic Deposit/Formation/Rock Unit~~	~~Potential Fossil Localities~~	~~Sensitivity Rating~~
~~Alluvium~~	~~All communities where this unit occurs~~	~~Low~~
~~River/Stream Terrace Deposits~~	~~A. South Eastern, Chollas Valley, Fairbanks Ranch, Skyline, Paradise Hills, Otay Mesa, Nestor, San Ysidro~~ ~~B. All other areas~~	~~A. Moderate~~ ~~B. Low~~
~~Mission Valley Formation~~	~~All communities where this unit occurs~~	~~High~~
~~Stadium Conglomerate~~	~~All communities where this unit occurs~~	~~High~~

~~Friars Formation~~	~~All communities where this unit occurs~~	~~High~~

Source: City of San Diego, 2011.

The FPA does not have any geologic formations recognized has low, medium or high sensitivity ratings

~~Late Quaternary Alluvium~~

~~The sediments at the bottom of streambeds of the later Quaternary alluvium are generally younger than 10,000 years old. In the Coastal Plain Region, later Quaternary alluvial deposits occur extensively along the floors of major east west trending drainages, as well as in many of the smaller tributary drainages. Fossils are generally unknown from these deposits in the Coastal Plain Region. However, there are three notable exceptions. Teeth and limb bones of a mammoth were found in floodplain deposits of the Tijuana River Valley, a single mammoth tusk was found in alluvial deposits in the southwestern portion of El Cajon Valley, and a mammoth femur was recovered from alluvial in the Santa Margarita River channel at the south end of the Camp Pendleton Marine Corps Base.~~

~~Unnamed River Terrace Deposits~~

~~Deposits of coarse grained, gravelly sandstones, pebble and cobble conglomerates, and claystones occur along the margins of many of the larger coastal river valleys, as well as in isolated areas associated with elevated marine abrasion platforms. These deposits generally occur at levels above the active stream channels and represent the sediments of ancient river courses. The exact age of these deposits is presently unknown, but it is estimated that they are anywhere from 10,000 to 500,000 years old. Fossils have been collected from river terrace deposits at several locations in coastal San Diego County. Fossils collected include "Ice Age" mammals, such as ground sloth, mammoth, wolf, camel, and mastadon.~~

~~Mission Valley Formation~~

~~The Mission Valley Formation in the proposed FPA area consists of light gray, fine grained marine sandstones, and is the only Eocene rock unit in southern California to have a radiometric date directly associated with fossil mammal localities. The marine strata of the Mission Valley Formation have produced abundant and generally well preserved remains of marine microfossils (e.g., foraminifers), macroinvertebrates (e.g., clams, snails, crustaceans, and sea urchins), and vertebrates (e.g., sharks, rays, and bony fish). Fluvial strata of the Mission Valley Formation have produced well preserved examples of petrified wood and fairly large and diverse assemblages of fossil land mammals including opossums, insectivores, bats, primates, rodents, artiodactyles, and perissodactyls. The simultaneous occurrence of land mammal fossils and marine microfossils is extremely important, as it allows for the direct correlation of terrestrial and marine faunal time scales. The Mission Valley Formation represents one of the few instances in North America where such comparisons are possible.~~

~~Stadium Conglomerate~~

~~The Stadium Conglomerate is made up of two conglomeratic units that are distinct both with regard to the time period of formation and to the composition of the formation (City, 2007). The upper and lower conglomeratic units are in depositional contact in the Mission Valley and Murphy Canyon areas. However, to the north and east, the upper member appears to be absent. The proposed FPA area is located within the upper member of the Stadium Conglomerate. Fossil foraminifers and marine mollusks have been collected from the upper member of the Stadium Conglomerate. Collecting sites in Murphy Canyon have~~

~~yielded sparse, but well-preserved remains of opossums, insectivores, primates, rodents, carnivores, rhinoceros, and artiodactyls.~~

~~Friars Formation~~

~~The Friars Formation consists primarily of sandstones, siltstones, mudstones, and cobble conglomerate. It is middle Eocene in age, and is rich in vertebrate fossils, especially terrestrial mammals such as opossums, insectivores, primates, rodents, artiodactyles, and perissodactyls. In addition, well-preserved remains of marine microfossils and macroinvertebrates as well as fossil leaves have also been recovered from the Friars Formation.~~

5.12.1.1 Regulatory Setting

Pursuant to Section 15065 of the State CEQA Guidelines, a lead agency must find that a "project may have a significant effect on the environment and therefore require an EIR to be prepared for the project where the project has the potential to eliminate important examples of the major periods of California history or prehistory, which includes the destruction of significant paleontological resources."

According to the City of San Diego's CEQA Significance Determination Thresholds, impacts to paleontological resources are considered potentially significant for areas with a high sensitivity if grading would exceed 1,000 cubic yards and extend to a depth of 10 feet or greater, and for areas with moderate sensitivity if grading would exceed 2,000 cubic yards and extend to a depth of 10 feet or greater. Additionally, impacts would be considered significant in areas of shallow grading where formational soils are exposed at the surface (i.e., as a result of previous grading) and where fossil localities have already been identified (City of San Diego, 2011).

5.12.2 Significance Determination Thresholds

According to the City's CEQA Significance Determination Thresholds, significant impacts to paleontological resources would occur if future development associated with the implementation of the proposed FPA would:

- *Require over 1,000 cubic yards of excavation extending to a depth of 10 feet or greater in a high resource potential geologic deposit/formation/rock unit; or,*
- *Require over 2,000 cubic yards of excavation extending to a depth of 10 feet or greater in a moderate resource potential geologic deposit/formation/rock unit.*

~~Because paleontological resources are largely a buried resource, there is no way to accurately predict what fossils are present within a site or their individual significance to the scientific community before they are discovered. For the purposes of this PEIR, impacts to paleontological resources are considered significant if future development activities involve grading in areas underlain by geologic formations that exhibit a moderate to high paleontological resource potential.~~ Figure 5.11-1, Geologic Map, shows there are no low, medium, or high sensitivity geologic formations. No mitigation is required.

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.12.3 Issue 1: Paleontological Resources

Issue 1: Would the proposed FPA require over 1,000 cubic yards of excavation in a high resource potential geologic formation or over 2,000 cubic yards of excavation in a moderate resource potential formation that would result in the loss of significant paleontological resources?

5.12.3.1 Impact Analysis

Figure 5.11-1 highlights the geologic conditions for the FPA. The FPA does not include any low, medium, or high sensitivity geologic formations as a result of the changed study area. Implementation of the FDA would not impact any sensitive geologic formations therefore no impacts would occur. No mitigation is required.

~~Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, activities which excavate or grade geologic formations, which could contain fossil remains, would be significant. Paleontological resources are typically impacted when earthwork activities such as mass excavation projects cut into geological deposits (formations) within which fossils are buried. These impacts are in the form of physical destruction of fossil remains. Since fossils are the remains of prehistoric animal and plant life, they are considered to be non-renewable. Such impacts are significant, and under CEQA Guidelines, require mitigation.~~

~~As identified in Table 5.12-1, the Alluvium and River/Stream Terrace Deposits within the proposed FPA have a low potential for producing significant paleontological resources. However, the Mission Valley Formation, Stadium Conglomerate, and Friars Formation have a high potential for producing significant paleontological resources. The FPA does not have any geologic formations recognized has low, medium or high sensitivity ratings~~

~~As shown in Figure 5.11-1 in Section 5.11, Geologic Conditions, of this PEIR, the majority of the proposed FPA area does not have the potential to yield paleontological resources.~~

~~The specific location and nature of future development projects within the proposed FPA area are currently unknown. However, it is anticipated that future development activities will involve grading and earthwork with excavations into these formations. Any future earthwork requiring excavation of 1,000 cubic yards or more and would extend to a depth of 10 feet or greater within the Mission Valley Formation, Stadium Conglomerate, and Friars Formation has the potential to significantly impact paleontological resources. However, implementation of the Mitigation Framework detailed in PR-1, which would require paleontological monitoring would reduce potential impacts to paleontological resources to a level less than significant. Mitigation Measure PR-1 requires monitoring of project site grading for any future~~

~~development projects in the areas of high sensitivity for paleontological resources, as well as recovery and proper curation of fossils should significant fossils be encountered during site grading.~~

5.12.3.2 Significance of Impact

~~Future development activities within the proposed FPA area have the potential to result in the substantial excavation of potential fossil bearing geologic formations. As such, potential impacts to paleontological resources would be considered significant. However, with the implementation of the Mitigation Framework detailed in PR-1, this impact would be reduced to a level less than significant.~~ Future development activities within the proposed FPA area have no potential to result in the excavation of potential fossil-bearing geologic formations. Figure 5.11-1 shows there are no low, medium, or high sensitivity geologic formations. This impact is less than significant.

5.12.3.3 Mitigation Framework

Mitigation is not required because there is no project-related paleontological impact. Figure 5-11.1 highlights that there are no low, medium, or high sensitivity geologic formations.

~~The following Mitigation Framework been developed by the City of San Diego to reduce the project-related paleontological impact to below a level of significance. These measures encompass a comprehensive program to protect paleontological resources should they be found at a construction site. The Mitigation Framework is consistent with standard programs employed at other sites within the City of San Diego. Implementation of these measures would allow preservation and future scientific study of any important paleontological resources encountered, thereby reducing the potential impact to below a level of significance. This Mitigation Framework applies to future development projects located within the Mission Valley Formation, Stadium Conglomerate and Friars Formation only.~~

~~*Mitigation Measure:*~~

~~**PR-1** Prior to the approval of subsequent development projects implemented in accordance with the CPU, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted under CPIOZ Type B, 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 USGS 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 resource potential geologic deposit/formation/rock unit.~~
- ~~Require over 2,000 cubic yards of excavation and/or a 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 MMRP shall be implemented during construction grading activities.~~

5.12.3.4 Significance after Mitigation

~~Implementation of Mitigation Measure PR-1 would ensure that potential impacts to paleontological resources that may result from future development under the proposed FPA would be reduced to a level less than significant.~~

5.12.6 Conclusion

~~The proposed FPA area is underlain by geologic formations characterized as highly sensitive in regards to the potential presence of paleontological resources. Any future development projects under the proposed FPA that propose grading of 1,000 cubic yards or more and would extend to a depth of 10 feet or greater within areas of high paleontological sensitivity have the potential to result in significant impacts to paleontological resources. However, implementation of the Mitigation Framework detailed in Mitigation Measures PR-1would reduce potential impacts to paleontological resources to a level less than significant.~~

The proposed FPA area is underlain by geologic formations that are free of low, medium, or high sensitivity geologic formations. Therefore the potential that paleontological resources could be impacted is less than significant and no mitigation is required.

5.13 Health and Safety

This section of the PEIR discusses the environmental impacts of the proposed FPA associated with health and safety. The information provided in this section is summarized from the *Hazardous Materials Technical Study* for the Grantville Focused Plan Amendment, prepared by Ninyo & Moore dated November 11, 2013 (Appendix J of this PEIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this PEIR.

Since the development of Appendix J, the boundaries for this project have been redrawn to reflect the exact areas affected by the proposed FPA. The maps and analysis in Appendix J, while completed for a larger geographical area, are still relevant to this PEIR as the actions in the proposed FPA (community plan amendment, CPIOZ, rezone, ~~CPIOZ,~~ and PFFP) have not changed.

5.13.1 Existing Conditions

The proposed FPA area is an approximately 280-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 (I-8) along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue. Portions of the proposed FPA area to the north, west, and southeast are located within a Very High Fire Hazard Severity Zone (VHFHSZ) as designated by the City of San Diego Fire-Rescue Department (City of San Diego, 2009).

5.13.1.1 History of the Proposed FPA Area

A review of historical aerial photographs and topographic maps was conducted by Ninyo & Moore (2013) to document the general historical development of the proposed FPA area.

A. Aerial Photographs

Historical aerial photographs for selected years dated 1928 through 2012 were reviewed. In general, scattered agricultural, commercial, and residential development has been present within the proposed FPA area since the 1920s. By the 1950s, the majority of present-day roads were existing, with increasing commercial development along major roads after approximately the 1960s. By the 1980s, the proposed FPA area was densely developed with primarily commercial/light industrial uses, similar to its current state.

B. Topographic Maps

The United States Geological Survey (USGS) La Mesa Quadrangle topographic maps dated 1967 (photorevised 1975), 1994, and 2012 were reviewed to evaluate the presence of facilities of potential environmental concern. The earlier map (1967, photorevised 1975) depicts structures within the proposed FPA area on the west side of Fairmount Avenue, along the San Diego River, which were interpreted to be industrial/commercial structures, since USGS maps typically do not depict individual residential structures in densely developed urban areas. Other clusters of commercial/industrial structures within the proposed FPA area were noted on the north side of Alvarado Canyon Road along I-8, and surrounding the junction of Friars Road and Mission Gorge Road. The Grantville School was noted adjacent to the eastern portion of the proposed FPA area, south of Vandever Avenue and east of Decena Drive/Mission Gorge Road.

In the 1994 USGS map, the clusters of commercial/industrial structures noted in the earlier map were no longer depicted; however, larger commercial/industrial structures were noted along Twain Avenue and Vandever Avenue, west of Mission Gorge Road. Other larger structures were noted along Mission Gorge Place, north of I-8. The proposed FPA area was otherwise generally depicted as being a "built-up" area (i.e., with urban development). Structures are not depicted in the 2012 USGS map.

5.13.1.2 Environmental Database Search

A number of facilities within the proposed FPA area were listed on unauthorized release databases. In general, the unauthorized release facilities are located along major streets within the proposed FPA area, including Friars Road, Mission Gorge Road, and Fairmount Avenue. Some of the unauthorized release cases remain open with regulatory agencies, generally indicating that impacts to soil and/or groundwater have not been assessed, and/or that remedial activities are ongoing. Based on a review of the regulatory database conducted by Ninyo & Moore, impacts to soil and groundwater have been documented at multiple properties within the proposed FPA area. The environmental database search identified the following properties listed in various databases:

- 3 Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) sites;
- 23 RCRA Small Quantity Generator (SQG) sites;
- 5 Emergency Response Notification System database sites;
- 7 Department of Toxic Substances Control (DTSC) ENVIROSTOR sites;
- 1 Waste Discharge System (WDS) site;
- 16 Spills, Leaks, Investigation and Cleanup (SLIC) sites;
- 1 Solid Waste Facilities/Landfills (SWF/LF) site;
- 47 Leaking Underground Storage Tank (LUST) sites; and,
- 17 Underground Storage Tank/Aboveground Storage Tank (UST/AST) sites.

A case-closed status generally indicates a lower likelihood that release continues to be a significant source of impacts to groundwater. However, cases in the 1980s and early 1990s were often justified for closure using rationale and/or methodology that would not be considered to be the current standard of care, and closure is generally based on regulatory action levels that can change over time. While there is a low likelihood that closed cases present potentially significant concern to the proposed FPA area, it is still possible that unauthorized releases that have been granted closure may have impacted soil and/or groundwater. Furthermore, there is also the possibility that soil and/or groundwater within the proposed FPA area may be impacted by businesses not listed on unauthorized release databases that use, store, or dispose of hazardous materials or wastes if releases of chlorinated solvents, petroleum hydrocarbons, and/or other hazardous materials/wastes have occurred.

5.13.1.3 Additional Environmental Record Sources

A. Online Regulatory Databases

Online regulatory databases were also reviewed to supplement the environmental database search conducted by EDR. Table 5.13-1 provides a summary of the findings from the online database search.

Table 5.13-1
Online Regulatory Databases

Online Database/Website	Findings
DTSC EnviroStor	The review of the EnviroStor database identified the same cases as those discussed in Appendix J Section 6.1.
DTSC Cortese List	The proposed FPA area was not listed.
SWRCB GeoTracker	The review of the GeoTracker database identified the same cases as those discussed in Appendix J Section 6.1
CalRecycle SWIS	According to the database, Admiral Baker Golf Course (37-CR-0002), located adjacent to the northwest of the proposed FPA area was a pre-regulations disposal site. No violations were reported.
California Department of Oil, Gas, and Geothermal Resources (DOGGR)	Oil, gas, or geothermal wells were not depicted within the project area.
U.S. Pipeline and Hazardous Materials Safety Administration, National Pipeline Mapping System Map Viewer	A natural gas transmission pipeline operated by San Diego Gas and Electric is present on the southern portion of the proposed FPA area and generally trends east to west parallel to I-8.
Army Corps of Civil Engineers Formerly Used Defense Sites Database	Camp Elliot is depicted adjacent to the northwest of the project area. The camp consists of 30,500 acres and is known or suspected to contain military munitions and explosives.

Source: Ninyo & Moore, 2013.

B. Refuse Dumps and Solid Waste Disposal Facilities

A "Report on Refuse Dumps" prepared by the City Planning Commission of the City of San Diego, dated January 31, 1938, was reviewed to evaluate whether documented historical dumps of trash/refuse were present in the proposed FPA area. Disposal facilities in the vicinity of the proposed FPA area were not listed in the document (City Planning Commission, 1938).

C. Mines

According to the California Division of Mines and Geology, Mines and Mineral Resources of San Diego County book dated 1963, two plaster sand processing operations are depicted along the San Diego River on the western portion of the proposed FPA area.

5.13.1.3 Commonly Encountered Environmental Conditions

The following are additional environmental conditions commonly encountered in developed areas.

A. Aerially-Deposited Lead

Aerially-deposited lead (ADL) is typically associated with exposed soil near freeway rights-of-way as a result of emissions from vehicular exhaust prior to the elimination of lead from fuels in the mid-1980s. Based on the

presence of roads within and adjacent to the proposed FPA area, it is possible that ADL is present within the proposed FPA area.

B. Treated Wood

Wooden infrastructure may be treated with chemical preservatives to prevent rotting due to mold, mildew, and insects, which may leach from the wood into surrounding soil. Wood preservatives may include creosote, chromated copper arsenate, alkaline copper quaternary, copper azole, copper-HDO, acid copper chromate, and chlorinated phenols.

C. Asbestos-Containing Materials

Potential asbestos-containing materials may be present within the proposed FPA area in older structures (e.g., pre-1980). In addition, commonly encountered asbestos-containing materials in street rights-of-way include insulated subsurface natural gas lines and cementitious water lines (e.g., transite).

D. Polychlorinated Biphenyl-Containing Material

Polychlorinated biphenyls (PCBs) were manufactured from the late 1920s until 1979 when their manufacture was banned by the Toxic Substances Control Act. PCBs were used in coolants, insulating fluids (transformer oil), caulk, sealants, and paints (roadway striping). Transformers associated with public utilities noted within the proposed FPA area along public ROW are owned and operated by San Diego Gas and Electric (SDG&E). SDG&E states that it has not specified PCB transformers for its electrical distribution system.

E. Lead-Based Paint

Painted surfaces within the proposed FPA area may contain lead-base paint. The Consumer Product Safety Commission has banned the use of paint containing lead above certain thresholds for residential uses. However, lead-based paint may be used in industrial settings or may be present on older structures (e.g., pre-1980) within the proposed FPA area.

F. Miscellaneous Hazardous Materials

Materials falling under the Universal Waste Rule (UWR) requirements may potentially be present in buildings within the proposed FPA area including, but not limited to: mercury-containing fluorescent light tubes and/or vapor lights, and PCB-containing light ballasts.

5.13.1.4 Sensitive Receptors

The locations of potential sensitive receptors to hazardous materials/waste impacts were documented within the proposed FPA area. Schools, daycare, and/or education-related facilities noted in the proposed FPA area include Little Sprouts Academy, Dehesa Charter School, Mission Nazarene Child Care, Academy of Learning Preschool, Junior Achievement of San Diego, and Gold N Child Care Services. National University, Nazareth School, and Stein Education Center were noted in the vicinity of the proposed FPA area, beyond the proposed FPA area boundaries. Hospitals in the proposed FPA area include Kaiser Permanente Foundation Hospital, located south of Zion Avenue and West Crawford Street, and the Kaiser Permanente Medical Facility located at 4405 Vandever Avenue between Fairmount Avenue and Mission Gorge Road.

5.13.1.5 Regulatory Setting

A. Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) is a U.S. law that provides the general guidelines for the waste management program. It includes a Congressional mandate directing the Environmental Protect Agency (USEPA) to develop a comprehensive set of regulations to implement the law. The hazardous waste program, under RCRA Subtitle C, establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal – in effect, from "cradle to grave" (EPA, 2012c).

B. Title 40 CFR, Part 257

Title 40 CFR, Part 257 established criteria for classification of solid waste disposal facilities and practices (Sections 257.1 to 257.30). The USEPA has the authority under RCRA to authorize states to implement RCRA, and California is a RCRA authorized state.

C. Title 40 CFR, Part 290

Title 40 CFR, Part 290 established technical standards and corrective action requirements for owners and operates of Underground Storage Tanks (USTs) under RCRA.

D. Clean Water Act

The Federal Clean Water Act (CWA) is the principal statute governing water quality and established the basic framework for regulating the discharge of pollutants into the nation's waters, a permit system known as the National Pollutant Discharge Elimination System (NPDES). The Environmental Protection Agency (USEPA) is given the authority to implement pollution control programs. The NPDES program requires permits for the discharge of pollutants from any point source (including storm water discharges) into "waters of the United States." As defined in the CWA, "waters of the United States" applies only to surface waters, rivers, lakes, estuaries, coastal waters, and wetlands. The authority to implement the NPDES program is generally delegated to individual states.

E. Clean Air Act

The Federal Clean Air Act (CAA) contains key provisions to protect public health and welfare from different types of air pollution caused by a diverse array of pollution sources. The CAA also contains specific provisions to address "hazardous" or "toxic" air pollutants that pose health risks such as cancer or environmental threats such as bioaccumulation of heavy metals (EPA, 2013a).

F. Comprehensive Environmental Response, Compensation, & Liability Act

The Comprehensive Environmental Response, Compensation, & Liability Act (CERCLA), commonly known as Superfund, created a tax on the chemical and petroleum industries and provided broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment (EPA, 2011b).

G. Superfund Amendments & Reauthorization Act

The Superfund Amendments & Reauthorization Act (SARA) amended CERCLA on October 17, 1986, making several important changes reflecting the USEPA's experience in administering the Superfund program in its first six years. SARA increased focus on human health problems associated with hazardous waste, permanent and innovative technologies for cleaning up hazardous waste sites, and required the USEPA to revise the Hazard Ranking System (HRS) (EPA, 2011a).

H. Federal Insecticide, Fungicide, & Rodenticide Act

The Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA) mandates that the USEPA regulate the use and sale of pesticides to protect human health and preserve the environment (EPA, 2012b).

I. Occupational Safety and Health Act

The Federal Occupational Safety and Health Act (OSHA) assures the safe and healthful working conditions for working men and woman by authorizing enforcement of standards developed under the Act. Additionally, the Act provides research, information, education, and training in the field of occupational safety and health (DOL, 2004).

J. Hazardous Materials Transportation Act

The Hazardous Material Transportation Act (HMTA) provides for adequate protection against the risks to life and property inherent in the transportation of hazardous material in commerce by improving the regulatory and enforcement authority of the Secretary of Transportation. The Secretary of Transportation defines a hazardous material as any "particular quantity or form" of a material that "may pose an unreasonable risk to health and safety or property" (EPA, 2011c)

K. Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) is the main federal law that ensures the quality of American's drinking water. Under SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards (EPA, 2012a).

L. Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) provides the USEPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The TSCA addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos, radon, and lead-based paint (EPA, 2013b).

M. San Diego County Area Plan

The San Diego County Department of Environmental Health, Hazardous Materials Division, established the County Area Plan for emergency response to a release, or threatened release, of hazardous material within the County. The Federal Risk Management Plan, as incorporated and modified by the State of California Accidental Release Prevention Program has a goal to make all facilities that handle regulated substances free of catastrophic incidents.

5.13.1 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Thresholds, impacts to health and safety would be considered significant if the proposed FPA would:

- *Expose people or structures to 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;*
- *Result in hazardous waste emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;*
- *Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan;*
- *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment;*
- *Expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses;*
- *Result in a safety hazard for people residing or working in a designated airport influence area; and/or,*
- *Result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.13.2 Issue 1: Wildland Fire Hazards

Issue 1: Would the proposed FPA expose people or structures to 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?

5.13.2.1 Impact Analysis

Portions of the proposed FPA area to the north, west, and southeast are located within a Very High Fire Hazard Severity Zone (VHFHSZ) as designated by the City of San Diego Fire-Rescue Department (City of San Diego, 2009). The proposed FPA and rezone of existing land uses would allow for the future development of residential and mixed-use development in the Grantville neighborhood, which is currently comprised of predominately industrial and commercial uses. Therefore, the proposed FPA would allow for future development that may expose people or structures to the existing fire zones. However, any future development proposed within this proposed FPA area would be subject to the City's standard

development review process and Land Development Code – Landscape Standards which is included in the Mitigation Framework outlined in HS-1. Therefore, compliance with HS-1 would ensure that no impact related to wildland fires would result from future development allowed in the proposed FPA area. As such, a less than significant impact is identified for this issue area.

5.13.2.2 Significance of Impact

Future development activities within the proposed FPA area have the potential to expose people or structures to significant loss, injury or death involving wildland fires. However, compliance with the Mitigation Framework outlined in HS-1 would ensure that no impact related to wildland fires would result from future development allowed in the proposed FPA area. As such, a less than significant impact with implementation of the proposed FPA would occur.

5.13.2.3 Mitigation Framework

Implementation of the proposed FPA would have a potentially significant impact related to wildland fires.

Mitigation Measure HS-1:

Future projects are ~~implemented in accordance with the CPU shall be~~ required to incorporate sustainable development and other measures ~~into site plans in accordance with the City's Brush Management Regulations and~~ in accordance with the Land Development Code - Landscape Standards ~~Landscape Standards pursuant to General Plan, and CPU policies~~ which are intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.

5.13.2.4 Impacts after Mitigation

With adherence to the Mitigation Framework as detailed in HS-1, impacts would be less than significant.

5.13.3 Issue 2: Hazardous Waste Exposure to Schools

Issue 2: Would the proposed FPA result in hazardous waste emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

5.13.3.1 Impact Analysis

Several existing schools and/or day care/educational centers are located within the proposed FPA area, and other proposed and/or existing schools may be located within a quarter-mile of the proposed FPA area. While it is possible that hazardous materials/wastes may be disturbed during future development project activities, implementation of the proposed FPA would be expected to result in the overall decreased exposure of sensitive receptors to hazardous materials, since one of the overall goals of the proposed FPA is to alleviate the proliferation of substandard industrial properties and allow for the financing of improvements such as industrial pollution mitigation. It is unlikely that the proposed FPA would result in a significant impact with the incorporation of the Mitigation Framework as detailed in HS-2 through HS-12, further discussed below in Section 5.13.7. As such, with the implementation of Mitigation Framework HS-2

through HS-12, the implementation of future development allowed by the proposed FPA would result in a less than significant impact related to exposure of existing or proposed schools to hazardous waste.

5.13.3.2 Significance of Impact

It is possible that hazardous materials/wastes may be disturbed during future development construction activities. Further evaluation shall be conducted on a project-specific basis prior to individual project implementation. However, implementation of the Mitigation Framework as detailed in HS-2 through HS-12, further described below in Section 5.13.7, would reduce impacts associated with accidental hazardous waste release during future project construction to a level less than significant.

5.13.3.3 Mitigation Framework

Mitigation Framework HS-2 though HS-12, as described in Section 5.13.7 below, shall be implemented to reduce potential hazardous waste impacts to existing and proposed schools associated with the proposed FPA to a level less than significant.

5.13.3.4 Impacts after Mitigation

Implementation of the Mitigation Framework as detailed in HS-2 through HS-12, described below in Section 5.13.7, would reduce impacts to a level less than significant.

5.13.4 Issue 3: Emergency Response and Evacuation Plans

Issue 3: Would the proposed FPA impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

5.13.4.1 Impact Analysis

Subsequent future development in the proposed FPA area would be consistent with the Navajo Community Plan. As such, the proposed FPA would not involve the closure of evacuation routes or interfere with an emergency response plan. It is anticipated that the proposed FPA would not result in an impact associated with impairing the implementation of, or physical interference with an adopted emergency response plan or emergency evacuation plan.

5.13.4.2 Significance of Impact

The proposed FPA would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, there would be no significant impact.

5.13.4.3 Mitigation, Monitoring, and Reporting

The proposed FPA would have no impact to this issue area; therefore no mitigation measures are required.

5.13.4.4 Impacts after Mitigation

No mitigation measures are required; therefore, there would be no impact after mitigation.

5.13.5 Issue 4: Government Lists of Hazardous Materials Sites

Issue 4: Would the proposed FPA be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

5.13.5.1 Impact Analysis

A. DTSC Listed Facilities

Government Code Section 65962.5 requires that the DTSC compile a list of facilities and properties in the five categories listed below:

- *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*
- *Sites included in the Abandoned Site Assessment Program*

Based on a review conducted by Ninyo & Moore (2013) of the databases listed above, the proposed FPA is not located on a site included in a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

B. Other Government Facilities Lists/Databases

The following provides a discussion of other hazardous materials Government Facilities Lists/Databases that were reviewed by Ninyo and Moore (2013) to determine potential impacts associated with the implementation of the proposed FPA.

a. **San Diego County Environmental Assessment Case Listing:** The County of San Diego DEH is the Certified Unified Program Agency (CUPA) responsible for tracking and maintaining hazardous materials/hazardous waste files in the County of San Diego. The DEH maintains listings of properties associated with unauthorized releases of hazardous materials and petroleum products and wastes. These listings, including LUST cases, were reviewed in the EDR environmental database report. Several facilities on the environmental assessment case listing were reported to be located on properties within the proposed FPA area.

b. **State Department of Toxic Substances Control (DTSC):** The DTSC Cortese List of hazardous waste sites compiled pursuant to Section 65962.5 of the California Government Code was reviewed by Ninyo & Moore (2013). No sites within the proposed FPA area were noted on the Cortese List.

c. **Other possible sources – Sanborn maps, Fire Department records, topographic/existing conditions surveys:** Sanborn fire insurance maps were not available for the proposed FPA area. Topographic maps, aerial photographs, environmental databases, among other sources, were reviewed for the HMTS. Various properties of potential environmental concern were noted in the proposed FPA area during review of the environmental database report, including unauthorized release facilities.

d. **Site-specific emission data from the San Diego Air Pollution Control District (SDAPCD):** As the proposed FPA does not specifically propose the construction of new industrial facilities, which could emit hazardous air pollutants, this criterion is considered non-applicable to the proposed FPA.

e. **Located within 1,000 feet of a known contamination site:** Based on review of the environmental database search report, known contamination sites, such as those associated with unauthorized releases of hazardous materials and wastes (e.g., LUST cases), are located in the proposed FPA area.

f. **Located within 2,000 feet of a known "border zone property" (also known as a "Superfund" site) or hazardous waste property subject to corrective action pursuant to Health and Safety Code:** No designated hazardous waste property or border zone property pursuant to Government Code Section 65962.5(a) are located within the proposed FPA area.

g. **Sites with DEH Site File Closed:** Based on review of the environmental database search report, properties associated with unauthorized release/LUST cases are located in the proposed FPA area. Some of the properties are associated with unauthorized release cases that remain open with regulatory agencies, generally indicating that impacts to soil and/or groundwater have not been delineated or assessed, and/or remedial activities are ongoing.

   A case-closed status generally indicates a lower likelihood that a release continues to be significant source of impacts to soil and/or groundwater; however, earlier cases, such as those in the 1980s and early 1990s, were often justified for closure using rationale and/or methodology that may not be considered to be the current standard of care, and closure is generally based on regulatory action levels, which can change over time. Therefore, while there is a lower likelihood of potential impacts compared to open cases; it is possible that unauthorized releases currently under case-closed status are associated with contamination within the proposed FPA area.

h. **Located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites:** The proposed FPA is not located in Centre City or in Barrio Logan. However, based on review of historical and regulatory sources indicating facilities of potential environmental concern, known and/or suspected contamination sites are located in the proposed FPA area.

i. **Located on or near an active or former landfill:** The Admiral Baker Golf Course Landfill is a closed, pre-regulation facility located adjacent to the northwest of the proposed FPA area, within the San Diego River valley. According to the CalRecycle website, the most recent inspection was conducted in December 2003 and no violations were reported. Review of the 1938 City of San Diego Planning Commission Report on Refuse Dumps and the County of San Diego Solid Waste Disposal Facilities map dated January 1985 did not reveal evidence that known refuse (trash) dumps or solid waste disposal facilities were historically located within or near the proposed FPA area.

j. **Properties historically developed with industrial or commercial uses which involved dewatering (the removal of groundwater during excavation), in conjunction with major excavation in an area with high groundwater (such as downtown):** Based on the research conducted by Ninyo & Moore for the Geology and Soils Evaluation, groundwater is present at relatively shallow depths in the proposed FPA area (as shallow as 9 feet below the adjacent surface). Therefore, the proposed FPA area is considered to be in a location with relatively high groundwater. Some properties within the proposed FPA area may have been associated with dewatering activities, the identification of which was beyond the scope for the HMTS.

5.13.5.2 Significance of Impact

Although the proposed FPA area is not located on a site included in a list of hazardous materials compiled by DTSC pursuant to Government Code Section 65962.5, portions of the proposed FPA area are included in a number of other government hazardous site lists/databases. It is possible that hazardous materials/wastes may be disturbed during future development construction activities. Further evaluation shall be conducted on a project-specific basis prior to individual project implementation for all projects. Implementation of the Mitigation Framework as detailed in HS-2 through HS-12, further described below in Section 5.13.7, would reduce potential hazardous waste impacts to the public or environment a less than significant level.

5.13.5.3 Mitigation Framework

Mitigation Framework HS-2 though HS-12, as described in Section 5.13.7 below, shall be implemented to reduce potential hazardous waste impacts to the public or environment associated with the proposed FPA to a level less than significant.

5.13.5.4 Impacts after Mitigation

Implementation of the Mitigation Framework as detailed in HS-2 through HS-12, described below in Section 5.13.7, would reduce impacts to a level less than significant.

5.13.6 Issue 5: Toxic Substances Exposure

Issue 5: Would the proposed FPA expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

5.13.6.1 Impact Analysis

Previous agricultural land usage can result in concentrations of constituents of concern (e.g., pesticides, herbicides) in soil and/or groundwater. Agricultural land usage in the proposed FPA area was noted during review of historical aerial photographs. However, by the 1980s, the majority of the proposed FPA area was developed with non-agricultural uses (e.g., commercial, industrial, residential). Properties within the proposed FPA area would be expected to have similar likelihood of containing agriculturally related contaminants, if any, as other nearby properties within San Diego. Implementation of the proposed FPA would not be expected to result in exposure to potentially impacted soil during future development activities. Based on the historical urban development of the proposed FPA area, and the length of time since agricultural uses were present within the proposed FPA, it is not likely that residual agricultural contaminants, if any, would result in a significant impact to future development projects. However, the implementation of Mitigation Framework as detailed in HS-2 through HS-12 would ensure that future development projects would not expose people to toxic substances and a less than significant impact is identified for this issue area.

5.13.6.2 Significance of Impact

Based on the historical urban development of the proposed FPA area, as well as the length of time since agricultural uses, it is not likely that residual agricultural contaminants, if present, would be exposed to people in the proposed FPA area. However for assurance, implementation of the Mitigation Framework as detailed in HS-2 through HS-12, described below in Section 5.13.7, would ensure impacts would be less than significant.

5.13.6.3 Mitigation Framework

Implementation of the Mitigation Framework as detailed in HS-2 through HS-12, described below in Section 5.13.7, would reduce potential impacts associated with the exposure to toxic substances associated with future development within the proposed FPA to a less than significant level.

5.13.6.4 Impacts after Mitigation

Implementation of the Mitigation Framework as detailed in HS-2 through HS-12, described below in Section 5.13.7, would reduce impacts to a less than significant level.

5.13.7 Mitigation Framework

The following mitigation measures relating to hazardous materials/wastes shall be required with implementation of the proposed FPA to identify where further remediation may be needed and what type of land uses may be appropriate at various locations. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 made the purchaser of any real property liable for any contaminants on this property. CERCLA's retroactive liability has made the performance of an Environmental Site Assessment (ESA) a practical necessity for any potential buyer of property who does not want to assume liability for the cleanup of any contaminants found on a previously industrial or light industrial use site. Any project with contaminants would be subject to a discretionary review process and CEQA guidelines. In addition, implementation of the following mitigation measures would reduce potential impacts identified in the issue areas above to a level less than significant.

Mitigation Measures:

HS-2 Property-specific due diligence processes shall be conducted by qualified environmental professionals, in accordance with applicable guidelines and regulations, on specific properties within the proposed FPA area prior to property transactions and/or future development. Phase I Environmental Site Assessments (ESAs) shall be conducted by qualified environmental professionals in accordance with the standard of care at that time (currently the American Society for Testing and Materials Standard Practice E1527-13) and applicable regulations (currently the EPA 40 Code of Federal Regulations §312 titled "Standards and Practices for All Appropriate Inquiries").

HS-3 For properties within the proposed FPA area with suspected or documented soil and/or groundwater contamination or other potential environmental concerns, further evaluation, such as Phase II ESAs and/or remediation activities, shall be conducted prior to or during future development activities by appropriately certified and/or registered professionals in accordance with a work plan that is approved by the regulatory agency having oversight of the activities. Results of previous assessment activities for a property (e.g., previous Phase II ESAs, UST removal sampling data) shall be evaluated by certified and/or registered professionals prior to future development activities.

HS-4 The "case closure" regulatory status shall be reevaluated prior to future development activities by a qualified environmental professional in conjunction with the regulatory agency having oversight of the activities for unauthorized release properties when a site use change is part of the planned future development (e.g., from industrial to residential use).

HS-5 For properties with documented or suspected impacts to soil and/or groundwater, appropriate worker and community health safety measures shall be implemented by the contractor under the oversight of a qualified environmental professional during soil/groundwater disturbance activities (e.g., dust control, air monitoring, stockpile management).

HS-6 It is possible that contaminated soil and/or groundwater, not identified during pre-construction technical ~~study~~studies, may be present within the proposed FPA area (e.g., lead in shallow soil, burn pits). For this reason, the following precautions shall be observed during excavation activities associated with the improvements conducted during future development:

- Pre-project activities (e.g., planning or early design) shall include site-specific environmental evaluation to address hazardous materials concerns related to worker and community health and safety, waste generation and disposal, and regulatory requirements.
- Caution shall be taken during excavation activities near the facilities associated with unauthorized releases, because of the potential for encountering documented and undocumented releases of contaminants and hazardous materials or wastes that may have occurred within or adjacent to these sites. Excavation and/or soil monitoring shall be conducted by professionals trained in the identification and management of hazardous materials or wastes, such as contaminated soil or groundwater.
- Appropriate references to the potential to encounter contaminated soil or groundwater shall be included in construction specifications.
- A Site Health and Safety Plan shall be prepared and implemented prior to initiation of construction activities within the boundaries of the proposed FPA area to reduce potential health and safety hazards to workers and the public.

HS-7 Soil generated during construction activities for future development (e.g., subsurface excavation, grading) at contaminated properties shall require chemical characterization (e.g., analytical testing) by a qualified environmental professional prior to reuse, export, or disposal.

HS-8 Further assessment is recommended to be performed by a qualified environmental professional if discolored soil or other potential environmental issues are encountered in the proposed FPA area during construction/future development activities. If contamination is discovered, regulatory agencies may require additional environmental investigation and/or mitigation to be conducted by the property owner, particularly if there is the potential to affect public health, safety, and/or the environment.

HS-9 Future development of impacted or potentially impacted properties involving soil excavation, grading, or other subsurface disturbance shall include implementation of a soil and groundwater management plan to address the possibility of encountering localized areas of potential environmental concern. The plan shall be prepared by a qualified environmental consultant and shall be implemented during soil/groundwater disturbance activities under the oversight of an environmental professional on behalf of the property owner/developer. The plan shall address monitoring of excavated soil, community and worker health and safety, and soil and groundwater handling, stockpiling, characterization, on-site reuse, export, and disposal protocols. Appropriate references to the potential to encounter contaminated soils and/or groundwater shall be included in construction specifications and bid documents so that the contractor can consider various factors (e.g., groundwater pumping rates, soil disposal) in their work.

HS-10 Groundwater at certain locations within the proposed FPA area has been documented as being impacted. Based on evidence of shallow groundwater depths (i.e., as shallow as 9 feet below adjacent ground surface) at some locations, if dewatering activities are planned for construction or other proposed improvements, they may be subject to increased disposal costs or other environmental surcharges (e.g., permitting) as a result of the presence of contaminated groundwater. A discharge permit will likely be required for dewatering, and water may need to be characterized by a qualified environmental consultant and/or treated prior to discharge. The RWQCB and/or agency providing oversight of wastewater discharge shall be contacted by a qualified environmental consultant in conjunction with the contractor and/or property owner for guidance on the requirements for discharge of dewatering effluent, prior to initiation of construction activities. The groundwater management plan mentioned in the previous bullet shall be implemented by a contractor during construction activities if groundwater is expected to be encountered.

HS-11 Prior to renovation or demolition of structures, surveys shall be conducted for the presence of hazardous building materials such as asbestos-containing materials, lead-containing surfaces, and other materials falling under UWR requirements. The surveys shall be conducted by California Department of Public Health Certified Lead Inspector/Assessors and California Division of Occupational Safety and Health Certified Asbestos Consultants in accordance with applicable local, state, and federal guidelines and regulations. Prior to renovation or demolition of buildings, appropriate abatement measures shall be implemented by a licensed abatement contractor using trained and certified workers and supervisors.

HS-12 For sites where structures are to be demolished, especially structures built in the 1970s or earlier, analyze surface and shallow soils for lead and termiticides prior to demolition or soil disturbance (e.g., grading).

5.13.8 Conclusion

With adherence to the Framework as detailed in HS-1, the proposed FPA would not expose people or structures to significant risk of loss, injury or death involving wildland fires. Overall, implementation of the proposed FPA is not anticipated to result in increased generation of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or wastes, nor would it impair implementation of, or physically interfere with an adopted emergency response or evacuation plan. However, soil and/or groundwater that have been impacted by releases of hazardous materials or petroleum products from surficial spills, subsurface releases from USTs, or other sources, may be considered a potential significant impact. As such, implementation of Mitigation Framework as detailed in HS-2 through HS-12 described above would reduce impacts associated with hazardous materials/waste to a less than significant level.

5.14 Public Services and Facilities

This section of the PEIR discusses the potential environmental impacts of the proposed FPA to public services and facilities.

5.14.1 Existing Conditions

Existing public services and facilities, including police, fire-rescue, libraries, parks and recreational facilities, and schools serve the residents and businesses within the proposed FPA area and surrounding communities. The locations of existing public facilities are shown in Figure 5.14-1.

5.14.1.1 Police Services

The San Diego Police Department (SDPD) provides police services including patrol, traffic, investigative, records, laboratory, and support services to the City of San Diego (City of San Diego 2008). The proposed FPA area is currently patrolled by Beat 321 in the Grantville neighborhood in the Eastern Division of the SDPD. The Eastern Division currently serves a population of 155,892 people and encompasses a total of approximately 47.1 square miles (City of San Diego, 2014a). The Eastern Division Police Substation houses approximately 108 sworn officers, and is located approximately 1.86 miles northwest of the proposed FPA area at 9225 Aero Drive, in the Serra Mesa community. Additional resources (such as SWAT, canine units, etc.) respond to the Eastern Division as needed. Previously, additional police services for the proposed FPA area were provided by the Police Community Relations Office (also known as the Navajo Storefront) located at 7381 Jackson Drive. However, according to Community Relations Officer McElroy, the Navajo Storefront is no longer in operation. The Eastern Division Police Substation is open Monday through Friday from 8 a.m. to 5 p.m.

According to the City of San Diego Fiscal Year 2014 Adopted Budget, the 2013 citywide staffing ratio for sworn police officer to population is 1.48 officers per 1,000 residents (City of San Diego, 2014b). The SDPD has personnel on duty and available to respond to calls for service seven days a week, 24 hours a day. SDPD currently utilizes a multi-level priority dispatch system, with different response-time guidelines for different call types. Calls for service range from level "1 priority," meaning life-threatening/suspicious activity, to level "4 priority" related to non life-threatening/suspicious activity. Priority E calls, meaning imminent threat to life, receive the highest priority.

Table 5.14-1 below lists the department's response-time guidelines, as well as the Eastern Division and citywide average response times for each Priority Call for 2013.

Table 5.14-1:
Eastern Division Call Priority Response Times

Call Priority	General Plan Response-Time Guidelines	2013 Average Response Times (Eastern Division)	2013 Average Response Times (Citywide)
Priority E – Imminent threat to life	Within 7 minutes	7.4 minutes	7.0 minutes
Priority 1 – Serious crimes in progress	Within 12 minutes	14.8 minutes	14.0 minutes
Priority 2 – Less serious crimes with no threat to life	Within 30 minutes	30.0 minutes	27.0 minutes
Priority 3 – Reported after a crime has been committed	Within 70 minutes	65.0 minutes	68.0 minutes
Priority 4 – Parking complaints and lost and found reports	Within 70 minutes	66.0 minutes	70.0 minutes

Sources: City of San Diego 2008a; City of San Diego, 2014; McElroy, pers. comm. 2014.

As indicated in Table 5.14-1, the average response times for Priority E calls in the Eastern Division exceed the General Plan response-time guidelines, and the average response times for Priority 1 calls in the Eastern Division and citywide exceed the General Plan response-time Guidelines. Response times for Priority 2, 3 and 4 calls are currently below or meet the General Plan response-time guidelines.

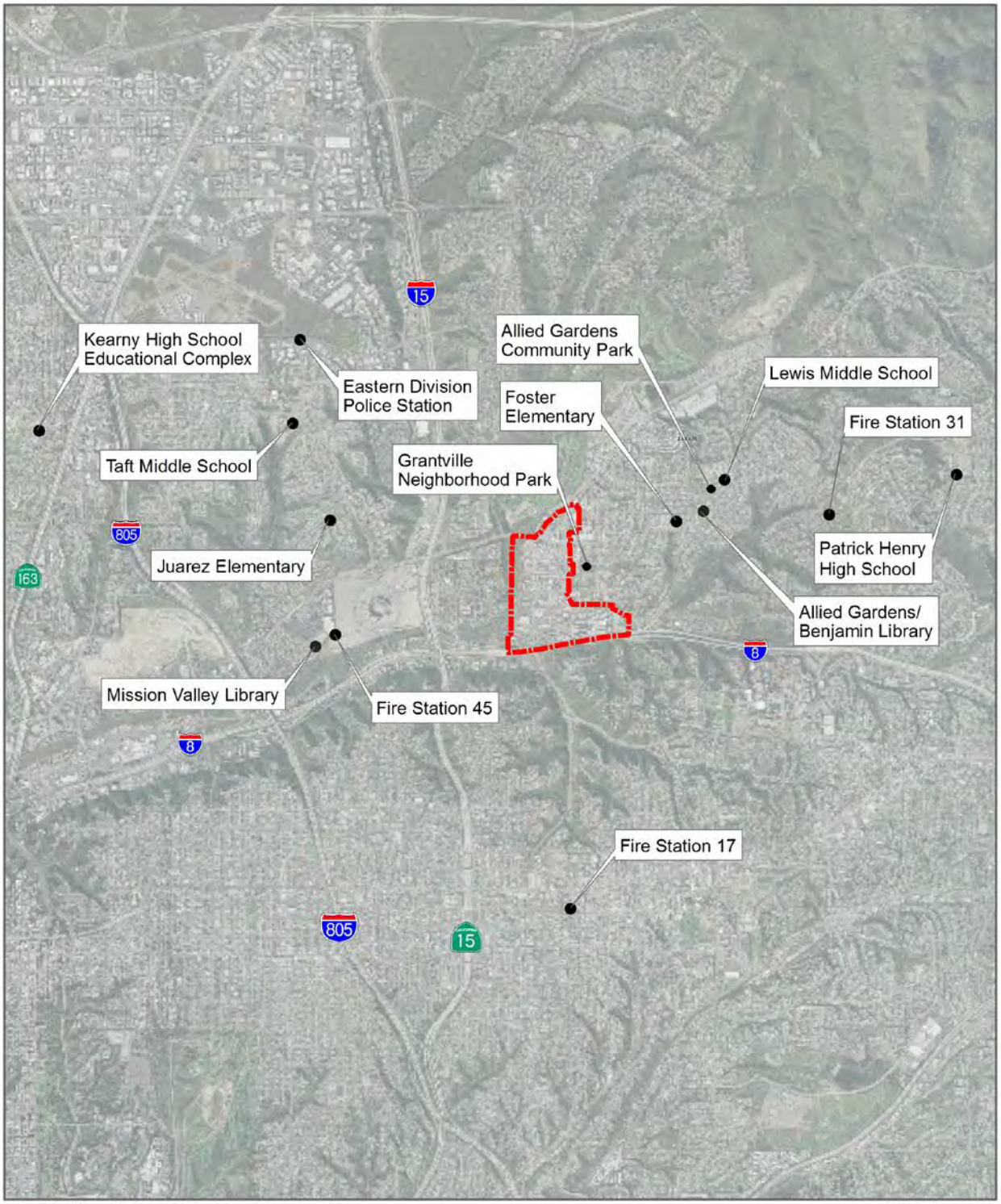
5.14.1.2 Fire/Life Protection

The proposed FPA area is located within the service area of the City of San Diego Fire-Rescue Department (SDFD). The SDFD serves a total area of approximately 331 square miles, including 17 miles of coastline extending three miles offshore, and a population of approximately 1,337,000 people. The SDFD has a current total of 47 fire stations and 9 permanent lifeguard stations, and employs 1,339 uniformed personnel and 161 civilian personnel for a total of 1,300 personnel. In addition to fire protection services, the SDFD also provides Emergency Medical Services (EMS). 911 calls are first screened by dispatchers who are trained in Emergency Medical Dispatch (EMD) protocols. Most fire stations send a fire engine (first responder) to all 911 medical calls. San Diego County EMS Policy requires two paramedics to respond to all 911 life-threatening calls. Ambulances are staffed with one emergency medical technician (EMT) and one paramedic, and first responders have a minimum of one firefighter/paramedic on board (City of San Diego, 2014c).

In 2011, the City of San Diego retained Citygate Associates, LLC to conduct a Fire Services deployment planning study to:

- Further refine the findings of the Regional Fire Service Deployment Study that Citygate conducted for the County of San Diego that pertained to Fire-Rescue deployment within the City of San Diego;
- Analyze whether the San Diego Fire-Rescue Department's performance measures are appropriate and achievable given the risks, topography and special hazards to be protected in the City of San Diego; and,
- Review existing Fire-Rescue Department deployment and staffing models for efficiency and effectiveness and determine how and where alternative deployment and staffing models could be beneficial to address current and projected needs (Citygate, 2011).

Prior to this study, the SDFD used the National Fire Protection Association (NFPA) Standard 1710 for the Organization and Deployment of Fire Suppression Operations to determine adequate response times. According to the standards, initial fire suppression resources shall be deployed to provide for the arrival of an engine company within a 4-minute travel time to 90% of incidents (NFPA, 2010). However, the study concluded that additional fire-rescue resources were needed to meet these service delivery goals. In response, the SDFD adopted the recommendations of the study and set new deployment standards, which differ from those provided in the City's General Plan. The updated deployment standards and fire station planning measures are described below.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Public Facilities

FIGURE 5.14-1

Distribution of Fire Stations

To treat medical patients and control small fires, the first-due unit should arrive within 7:30 minutes. This should occur at least 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1:30 minutes/seconds company turnout time and 5 minutes drive time in the most populated areas.

Multiple-Unit Effective Response Force for Serious Emergencies

To confine fires near the room of origin, to limit wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once, a multiple-unit response of at least 17 personnel should arrive within 10:30 minutes/seconds from the time of 911-call receipt in fire dispatch, 90 percent of the time. This equates to 1-minute dispatch time, 1:30 minutes/seconds company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas.

Adopted Fire Station Location Measures

To direct fire station location timing and crew size planning as the community grows, the adopted fire unit deployment performance measures based on population density zones are listed in the Table 5.14-2 below:

Table 5.14-2: Deployment Measures for San Diego City 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

Source: SDFD, 2014.

Aggregate Population Definitions

Where more than one square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregate into a population "cluster," these standards guide the determination of response time measures and the need for fire stations:

Table 5.14-3: Aggregate Population Standards

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: SDFD, 2014.

Three SDFD fire stations are located within the vicinity of the proposed FPA and would provide fire and emergency services to the proposed FPA area:

- Station 31 located at 6002 Camino Rico
- Station 45 located at 9449 Friars Road
- Station 17 located at 4206 Chamoune Avenue

Fire Station 31 is the primary responding unit for the proposed FPA area and serves Grantville/Del Cerro and its surrounding areas. Station 31 is located approximately 1.14 miles east of the proposed FPA area. In addition, Engine 31's district is 6.30 square miles. This station includes a fire engine, a paramedic unit, and a medic rescue rig (City of San Diego, 2014c). Table 5.14-2 shows the number of incident runs for Engines 31, 45 and 17 for Fiscal Year (FY) 2013.

Table 5.14-4: Fire Stations 45, 31, and 17 Incident Runs for FY 2013

	Engine 31	Engine 45	Engine 17
Total Incident Runs	1,877	2,110	5,901
Fire	136	209	345
Medical/Rescue	1,566	1,641	5,236
Other	172	260	320

Sources: City of San Diego Fire-Rescue, 2014c;

5.14.1.3 Libraries

The proposed FPA is located within the service area of the City of San Diego Public Library system. The City of San Diego General Plan states that the library system is a vital learning presence in the community, providing information objectively and offering lifelong learning opportunities through the system's Central Library and 35 branches. The library system conducts regular evaluations of services to adapt to service demands, to take advantage of constantly evolving technology, and to provide for facility construction and maintenance costs. Such assessments contribute to the provision of adequate collections that are responsive to community needs.

The facility requirements for branch libraries establish a minimum of 15,000 square feet of dedicated library space and should include features and services that address community specific needs (City of San Diego, 2008). In addition, branch libraries should ideally serve a resident population of 30,000 and may be established when a service area, which is expected to grow to 30,000 residents within 20 years of library construction, has a minimum population of 18,000 to 20,000. Branches should also be located in areas of intense human activity, with a two-mile maximum service area, where trips can be combined with other daily trips (City of San Diego, 2011). The proposed FPA area is currently served by two City of San Diego Public Libraries, each within the two-mile service area. The Allied Gardens/Benjamin Library is a 3,875 square foot facility located at 5188 Zion Avenue, approximately 0.73 miles east of the proposed FPA. Based on the 15,000 square foot requirement of the General Plan, the Allied Gardens/Benjamin Library is severely deficient in dedicated library space. Also, the Mission Valley Library is 20,000 square foot facility constructed in 2002, located at 2123 Fenton Parkway approximately, 1.30 miles west of the proposed FPA. The Mission Valley Library exceeds the General Plan requirements for dedicated library space.

5.14.1.4 Parks/Recreational Facilities

The City of San Diego has over 38,930 acres of park and open space lands that offer a diverse range of recreational opportunities. Parks can improve the quality of life by assisting in maintaining physical well-being. Parks can also provide other benefits, including visual relief from urban development, passive recreational opportunities, and healthy activities for youth (City of San Diego, 2008). The City operates three different types of parks for residents and visitors, including population-based parks (neighborhood and community), resource-based parks that include natural or man-made resources intended to serve the citywide population, and open space lands ~~parks~~ that allow public access to city canyons, mesas and other natural land forms.~~undeveloped natural landforms.~~

~~The proposed FPA area is located within the Navajo Planning Area of the Eastern Region designated in the City of San Diego's General Plan. The Eastern Region contains a total of 8,018.4 acres of parks and open space. A breakdown of Eastern Region parks and open space can be seen in Table 5.14-3.~~

~~Table 5.14-5~~
~~Eastern Region Parks and Open Space~~

~~Population~~	~~Population Based Parks (acres)~~	~~Resource Based Parks (acres)~~	~~Open Space Lands (acres)~~	~~Other Park Lands (acres)~~	~~Total Parks and Open Space (acres)~~
~~253,843~~	~~899.6~~	~~0.0~~	~~7,118.8~~	~~0.0~~	~~8,018.4~~

~~Source: City of San Diego, 2008b.~~

The City's General Plan establishes a minimum standard of 2.8 useable acres per 1,000 residents for population-based parks (City of San Diego, 2008). This standard can be met through neighborhood and community park acreage, as well as park equivalencies. ~~Currently, there are approximately 3.54 acres of population based park space per 1,000 people in the entire Eastern Region, which greatly exceeds the population based standards set forth in the City's General Plan.~~ There is no standard for resource-based parks or open space lands ~~parks~~ in the City's General Plan.

The ~~entire~~ Navajo Community is currently served by three community parks, six neighborhood parks, and five joint-use areas. The current Navajo community population warrants approximately 136~~8.9~~ acres of population-based park space, and a total of approximately 204~~151.42~~ acres of population-based park space is recommended at full community build-out (City of San Diego, 2007).

Neighborhood parks are typically ~~should have a size of~~ three to 13 acres and serve a population of ~~3,500 to~~ 5,000 residents living within approximately one ~~half~~-mile distance. The existing ~~One neighborhood park is located within the half-mile service area. The~~ Grantville Neighborhood Park, located on Vandever Avenue, is approximately 2.66 acres and includes an open play lawn, a tiny-tots play area, and picnic facilities and serves the Grantville area.~~.~~

Community parks are typically ~~should have a minimum size of~~ 13 acres and serve a populations of ~~between 18,000 to~~ 25,000 residents and typically serve one community plan area but depending on location, can sever multiple community planning areas. ~~living up to one and a half miles from the park.~~ A

typical component of a community park includes a recreation center, which should be a minimum 17,000 square feet (sf) per 25,000 residents. In addition, a community swimming pool with a minimum standard size of 25 meters by 25 yards is recommended within a six ~~one and a half to two~~ mile service radius for every 50,000 residents. Allied Gardens Community Park and Recreation Center, located adjacent to Lewis Middle School, is the only community park located adjacent to Grantville. ~~within the service area.~~ This facility is approximately 13.84 acres, which includes the 9,186 sf recreation center and a swimming pool. The Allied Gardens Community Park and Recreation Center is adjacent to Lewis Middle School which provides ~~also includes an additional~~ 9.584.8 acres of turf athletic fields for public use through ~~located on the Lewis Middle School campus that are usable by the community through~~ a joint use agreement with the San Diego Unified School District. ~~school/City lease arrangement.~~

~~Resource based parks should provide approximately 15 to 17 acres per 1,000 residents citywide. Resource-based parks are identified as areas of outstanding scenic, natural, or cultural interest; however, portions of these parks may serve as a community park (City of San Diego, 2011). Resource based parks in the Navajo Community include Mission Trails Regional Park and the San Diego River Park~~

5.14.1.5 Schools

The proposed FPA area is located within two separate attendance boundaries of the San Diego Unified School District (SDUSD). Portions of the proposed FPA west of Mission Gorge Road are located within an Optional Area attendance boundary, while portions of the proposed FPA east of Mission Gorge Road are located within a typical single school attendance boundary. Certain areas of the SDUSD have been designated Optional Areas and allow for students who reside in an Optional Area to select one of the multiple schools servicing that area.

Six SDUSD schools serve the proposed FPA area, including two elementary schools, two middle schools, and two high schools.

- Juarez Elementary School is located at 2633 Melbourne Drive, approximately 1.24 miles to the west of the proposed FPA area;
- Foster Elementary School is located at 6550 51st Street, approximately 0.56 miles to the east of the proposed FPA Area;
- Lewis Middle School is located at 5170 Greenbrier Avenue, approximately 0.90 miles east of the proposed FPA area;
- Taft Middle School is located at 9191 Gramercy Drive, approximately 1.68 miles to the northwest of the proposed FPA area;
- Patrick Henry High School is located at 6702 Wandermere Drive, approximately 2.11 miles to the northeast of the proposed FPA area; and,
- Kearny High School Educational Complex is located at 7651 Wellington Way, approximately 3.31 miles to the northwest of the proposed FPA area.

Students located in the proposed FPA area west of Mission Gorge Road may choose any of the listed schools (the preference among existing students is for Foster, Lewis, and Henry). Students located in the proposed FPA area east of Mission Gorge Road are assigned only to Foster, Lewis, and Henry (pers. comm. Hudson, 2014). Table 5.14-4 below shows the existing and projected (2014-2015) enrollment and capacity for each of the schools serving the proposed FPA area. As indicated below, the enrollments at all schools are currently well below the available capacity.

Table 5.14-~~6~~5: School Enrollment and Capacity

School	Estimated Capacity	2013-14 Enrollment	2014-2015 Enrollment Projection	Current Available Capacity
Foster Elementary (K-5)	572	373	355	199
Juarez Elementary (K-5)	380	240	244	140
Lewis Middle School (6-8)	1,151	1,031	1,022	120
Taft Middle School (6-8)	813	516	523	297
Henry High School (9-12)	2,474	2,056	2,418	418
Kearny High Complex (9-12)	1,825	1,550	1,510	275

Notes: Capacities are approximate and are calculated using current class size ratios; if class size ratios change, additional or less capacity may be available. Attendance boundaries are reviews annually and may change. Inclusion in the above table does not guarantee that these schools will serve any future residential development in the proposed FPA area.
Current available capacity is based on the estimated capacity and 2013-2014 enrollment.
Source: SDUSD, 2014; Hudson, pers. comm. 2014.

5.14.1.6 Roadway Maintenance

Maintenance of the City of San Diego's circulation system is a critical City function that enhances safety, efficiency, and capacity of the circulation system thus enhancing mobility. Established industry metrics and benchmarking with similar municipalities, as well as regular assessment of system conditions, form the basis for determining the level of City resources that are allocated to maintain baseline standards (City of San Diego, 2008).

The City of San Diego Public Works Department (PWD) provides engineering services including technical and operational support, design, and construction for the Capital Improvements Program (CIP), and oversight of the development of public infrastructure and facilities. The PWD is comprised of three branches, which consists of 10 divisions. Within the Engineering Branch, the Right-of-Way Division manages the implementation of right-of-way and related horizontal capital improvement projects, including the design and management of transportation and street-related projects (City of San Diego, 2014d).

Daily operation and maintenance of the City's roadways is provided by the Street Division of the City's Transportation and Storm Water Department. The mission of the Street Division is, "to provide a safe city street system through effective and efficient maintenance, with an emphasis on exceptional customer service". The Street Division's Roadways Services is responsible for alleys, bridges, curbs, gutters, dirt roads, potholes, sidewalks, street resurfacing and slurry sealing. Contractors perform resurfacing on City streets, and City crews perform other repairs as necessary. The Street Division inspects and evaluates contractors' work to assure it meets with City codes and standards (City of San Diego, 2014d).

5.14.1.7 City of San Diego General Plan Policies

The Public Facilities, Services and Safety (Public Facilities) Element, Recreation Element, and Mobility Element of the City of San Diego's General Plan include a number of policies addressing the public services

and facilities discussed in this section. In addition to essential public facilities and services such as Fire-Rescue, Police, Libraries, and Schools, the Public Facilities Element also includes policies that apply to transportation improvements and park and recreation facilities and services, with additional guidance from the Mobility Element and the Recreation Element. The Public Facilities Element also includes a public facilities financing strategy, prioritization guidelines, and policies for new growth to pay its fair-share contribution towards public facility improvements.

5.14.1.8 Navajo Public Facilities Financing Plan

The City maintains a Public Facilities Financing Plan (PFFP) for the Navajo Community Planning Area, which will be updated concurrently with the proposed amendment to the Navajo Community Plan. The PFFP includes the community's boundary, a summary of the community's existing public facilities and future needs, a financing strategy, a Development Impact Fee (DIF) determination, and an impact fee schedule. The DIF incorporates community build-out assumptions and cost assumptions for the proposed community-serving facilities. DIFs are collected through new development permits ~~to maintain existing levels of service for the community and~~ to mitigate the impact of new development through provision of a portion of the financing needed for these identified public facilities. The PFFP sets forth the major public facilities needs specific to the Navajo community with respect to transportation (streets, storm drains, traffic signals, etc.), libraries, park and recreation facilities, and fire stations.

5.14.2 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a potential significant impact to public services and facilities would occur if implementation of the proposed FPA would have:

- *An effect upon, or result in a need for new or altered government facilities in any of the following areas: police protection, fire/life safety protection, libraries, parks or other recreational facilities, maintenance of public facilities, including roads, and schools.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.14.3 Issue 1: Public Facilities

Issue 1: Would the proposed FPA have an effect upon, or result in a need for new or altered governmental services in any of the following areas:

- **Police protection**
- **Fire/life protection**
- **Libraries**
- **Parks/recreational facilities**
- **Schools**
- **Roads**

5.14.3.1 Impact Analysis

A. Police Protection

The proposed FPA area is currently served by Beat 321 in the Grantville neighborhood in the Eastern Division of the SDPD. The Eastern Division police station is 1.86 miles to the northwest of the proposed FPA area, located at 9225 Aero Drive. Police protection for the proposed FPA area would continue to be provided by the Eastern Division of the SDPD. Table 5.14-1 identifies that the response times for the Priority E and Priority 1 calls in the Eastern Division exceed the General Plan response time guidelines, while Priority 2, 3, and 4 calls are below or meet the General Plan response time guidelines. Additionally, as noted above, the 2013 citywide staffing ratio for police officer to population is 1.48 sworn officers per 1,000 residents.

The proposed FPA would result in a net increase of 8,275 residential dwelling units, and would thus increase residential population requiring additional police services in the area at build-out. According to the Air Quality Study prepared for the proposed FPA (Appendix C of this PEIR), this increase in dwelling units would generate approximately 15,888 new residents.

SDPD has indicated that the net increase of 8,275 residential dwelling units and approximately 15,888 new residents at build-out of the proposed FPA would likely increase the number of calls for service, which in turn would potentially increase the response times to those calls. Typically, multi-family and low-income housing units have a greater number of service calls than single-family residences, primarily because of the increased population density. Since the proposed land uses consist primarily of residential and commercial mixed-use, and multi-family residential, there would likely be a significant increase in the number of service calls requiring responses from Beat 321 and the Eastern Division. In addition, the SDPD has indicated that no new officers would be added to the area with implementation of the proposed FPA, as the Eastern Division is not currently allocated additional police officers due to budget considerations and constraints (pers. comm. McElroy, 2014).

No facilities are required or anticipated because no new police officers are being added to the area. The construction of any new police facilities or expansion of existing facilities that may be required as a result of future actions not associated with this proposed FPA would be subject to environmental review pursuant to CEQA at the time of plan design for such facilities. Therefore, ~~it is anticipated that impacts associated~~at this program-level of analysis, environmental impacts associated with the construction or expansion of police ~~protection~~ facilities would be less than significant with the implementation of the proposed FPA.

B. Fire/Life Protection

The PFFP amendment included in the proposed FPA contains line items to address Fire and Safety Protection. ~~One of these projects, t~~ The expansion of Fire Station 31 located at 6002 Camino Rico, was completed in 2006. The PFFP includes expansion of Fire Station 34, however, Fire Station 31 serves the Grantville FPA. Fire Station 31 is the primary responding unit for the proposed FPA area and serves Grantville/Del Cerro and its surrounding areas.

To direct fire station location timing and crew size planning as the community grows, the adopted fire unit deployment performance measures based on population density zones are listed in the Table 5.14-2. Any expansion construction of this facility or the development of a new facility would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level of analysis, impacts related to the expansion construction would be less than significant.

C. Libraries

The proposed FPA would rezone portions of the proposed FPA from predominately single-use commercial and industrial zones to residential and mixed-use zones, allowing for a net increase of 8,275 dwelling units and approximately 15,888 new residents at build-out. The increase in population in the proposed FPA area would likely increase the number of people utilizing local branch libraries serving the Proposed FPA area. The Allied Gardens/Benjamin Library and Mission Valley Library are both within the 2.0-mile maximum service area identified in the City's CEQA Significance Determination Thresholds. As such, both could potentially serve as local branch libraries to future residents of the proposed FPA area.

The City's General Plan establishes a minimum of 15,000 square feet of dedicated library space for branch libraries. In addition, branch libraries should ideally serve a resident population of 30,000 and may be established when a service area, which is expected to grow to 30,000 residents within 20 years of library construction, has a minimum population of 18,000 to 20,000. Currently, the 3,875 square foot Allied Gardens/Benjamin Library is severely deficient in dedicated library space. However, the Navajo PFFP provides for the expansion/replacement of the existing Allied Gardens/Benjamin Library to 15,000 square feet to be consistent with the City's General Plan requirements for libraries, although funding sources are currently unidentified. In addition, the new 20,000 square foot Mission Valley Library greatly exceeds the City's General Plan requirements for libraries, and should be able to provide adequate library services to the proposed FPA area as it will be accessible to the proposed FPA area by transit. Furthermore, as required in the City's General Plan, any future residential developments in the proposed FPA area would make a fair share contribution to library facilities through DIF payments, which will be detailed within the updated Navajo PFFP. Therefore, these two libraries could adequately service the increase in residents as a result of the proposed land use amendments, and it is anticipated that impacts to these branches would be less than significant with the implementation of the proposed FPA and associated updated PFFP.

D. Parks/Recreational Facilities

Implementation of the proposed FPA would allow for a net increase of 8,275 residential dwelling units at build-out. As previously mentioned, this increase in dwelling units would generate an estimated 15,888 new residents. As such, the increase in population in the proposed FPA area would likely increase the use of City park and recreational facilities by future residents. Population-based park requirements for the proposed FPA are based on full build-out. Table 5.14-~~6~~5 identifies the current and proposed population-based park acreage and recreation facility needs of the Navajo Community and the proposed FPA area at build-out.

Table 5.14-67: Existing and Proposed Population-Based Parks and Recreational Facilities Needs in the FPA

	Existing	Build-out Requirements	Build-out Deficit
Population-Based Parks (acres)	25.210.86	44.49*	19.2823.63
Recreational Centers (sq. ft)	9,186	10,804**	1,618
Aquatic Complex (m x yd)	125 x 25	0.310	0

Notes: *General Plan Guideline: 15,888 people ÷ 1,000 = 15.888 x 2.8 acres = 44.49 acres
**General Plan Guideline: 15,888 people ÷ 25,000 = 0.636 x 17,000 sf = 10,804 sf
***General Plan Guidelines: 15,888 ÷ 50,000 = 0.31
Source: City of San Diego, 2008 and BRG Consulting, Inc., 2014.

As shown in Table 5.14-65, implementation of the proposed FPA would result in a population-based park deficit of 19.2823.63 acres and a recreational center deficit of 1,618 square feet. surplus of approximately 3 acres and a deficit of approximately 12,000 square feet of recreational center space. The existing community pool at the Allied Gardens Recreation Center currently meets General Plan standards for aquatic complexes. Based on the information provided in Table 5.14-55.14-6, implementation of the proposed FPA would promote population growth resulting in a need for new or altered park and recreational facilities to meet the General Plan requirement of 2.8 usable acres of population-based park per 1,000 residents. As such, impacts to parks and recreational facilities would be considered significant.

The entire Navajo Community is currently served by three community parks, six neighborhood parks, and five joint-use areas. The current Navajo community population warrants approximately 1368.9 acres of population-based park space. At community build out the Navajo Community population will require approximately 204 acres of population-based parks. Through the community update process an additional 72.46 acres of park land was identified for future acquisition and development, resulting in a 7.76 acre surplus in the Navajo Community. In addition, a total of approximately 151.4 acres of population based park space is recommended at full community build out.

The futurerecommended park acreage identified at full community build-out is calculated in the Navajo PFFP. By law, DIFs cannot be collected to satisfy existing infrastructure deficiencies. As such, the fees collected from future new development within the proposed FPA area will generate only that portion of the amount needed for new development. The entire park acreage and projected population is used in determining the park component of the DIF for Navajo. The Navajo PFFP currently identifies a number of proposed park and recreation facilities projects that would be scheduled once funding sources are identified, several of which would serve the proposed FPA area. A few of the proposed park and recreation faclilities projects include the expansion and upgrade of the Allied Gardens Community Park swimming pool facilities, as well as an expansionreplacement of the existing 9,186 sf Allied Gardens Recreation Center with a new to a 17,000 sf recreation center in order to conform to the General Plan guidelines for recreation centers. Additional proposed park and recreation projects are further detailed in the Navajo PFFP.

As previously discussed, an update to the Navajo PFFP is a component of the proposed FPA, which would require future developments in the proposed FPA area to contribute to the construction of new park and recreational facilities, as needed, through the mandatory payment of DIFs. The proposed update to the

Navajo PFFP ~~would ensure~~ create a financing plan for public facility demands and adjust~~ed~~ the plan to account for changes in future land use that would result from the proposed increase in residential density in the Grantville neighborhood. The DIFs would be assessed on a project-specific basis and required as conditions of project approvals to address proportionate fair-share of capital costs of constructing new park and recreational facilities to serve the needs of future residents. The construction of any new park and recreational facilities ~~that may be required~~ would be subject to environmental review pursuant to CEQA at the time of design and approval of such facilities. Therefore, it is anticipated that impacts associated with parks and recreation facilities would be less than significant with the implementation of the proposed FPA.

E. Schools

The proposed FPA would rezone portions of the area from predominately single-use commercial and industrial zones to residential and mixed-use zones, allowing for a net increase of 8,275 dwelling units and approximately 15,888 new residents at build-out. The increase in population in the proposed FPA area would potentially result in increased enrollment by future students in each of the six SDUSD schools serving the proposed FPA area. Table 5.14-4 shows the existing and projected (2014-2015) enrollment and capacity for each of the schools serving the proposed FPA area. Between these six schools, there is inadequate capacity available to serve the increase in student population likely generated by the proposed FPA. Development of new schools within the proposed FPA area would likely be required (Hudson pers. comm., 2014). Typically, student generation rates can be used to determine the projected number of students that would be generated by the proposed FPA. Student generation rates vary based on the type of project, the number of units, the bedroom mix, whether there are affordable or senior housing components, the proximity to schools, the amenities, the neighborhood, and other factors. According to the SDUSD, the information currently available about the proposed FPA lacks a level of detail necessary to produce reliable student generation estimates. However, the SDUSD has indicated that the cumulative potential increase in students from the proposed FPA, nearby proposed developments, and enrollment from existing nearby single-family residential neighborhoods would likely impact district schools to the point of reaching or exceeding capacity. Therefore, new or expanded school facilities would likely be needed (Hudson pers. comm., 2014). As such, implementation of the proposed FPA and subsequent future development would result in a significant impact to schools. The construction of any new school facilities that may be required would be subject to environmental review by SDUSD pursuant to CEQA at the time of design and approval of such facilities.

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. Therefore, impacts to schools resulting from future development would be less than significant through implementation of SB 50 (City of San Diego, 2011).

F. Roadway Maintenance

The proposed FPA would rezone the area from predominately single-use commercial and industrial zones to residential and mixed use zones, which would likely increase the overall volume of traffic accessing the proposed FPA area on any given day. The potential increase in vehicles travelling on the road segments in the study area would potentially affect roadway conditions for those segments. The impacts relating to traffic and roadways as a result of the proposed FPA are discussed in detail in Section 5.2 Traffic/Circulation of this PEIR, as well as the Traffic Impact Analysis provided as Appendix B of this PEIR.

The proposed FPA includes the Grantville Community Plan Implementation Overlay Zone (CPIOZ) Type A designation within the proposed FPA area. The CPIOZ provides supplemental development regulations and guidelines to implement Transit-Oriented Development (TOD) within the Navajo Community Plan area, which would reduce reliance on the use of automobiles as the primary means of transportation. ~~In addition, the Navajo PFFP identifies a number of transportation related projects that are needed in the Navajo Community. An update to the Navajo PFFP is a component of the proposed FPA, which would identify funding sources for any necessary roadway improvements. Future developments in the proposed FPA area would be required to contribute to the roadway improvements, as needed, through the mandatory payment of DIFs. The proposed update to the Navajo PFFP is to assure that public facility demands are adjusted to account for changes in future land use that will result from the proposed increase in residential density in the Grantville neighborhood. The DIFs would be assessed on a project specific basis and required as conditions of project approvals to address proportionate fair share of capital costs of roadway improvements. The construction of any new roadways that may be required would be subject to environmental review pursuant to CEQA at the time of plan design for such facilities.~~ Therefore, it is anticipated that impacts associated with roadway maintenance would be less than significant with the implementation of the proposed FPA.

5.14.3.2 Significance of Impact

A. Police Protection

The population increase that would result from implementation of the proposed FPA would not result in the need to construct a new substation. Therefore, no DIF payments for police facilities will be required for future development within the proposed FPA. Typically, to address increases in population, staffing ratios are evaluated and officers are appropriately allocated, rather than constructing additional substations. However, if a new substation would be required, the construction of any new police facilities would be subject to environmental review pursuant to CEQA at the time of plan design for such facilities. Therefore, it is anticipated that impacts associated with police protection would be less than significant with the implementation of the proposed FPA.

B. Fire/Life Protection

Three SDFD fire stations are located within the vicinity of the proposed FPA and would provide fire and emergency services to the proposed FPA area. Fire Station 31 is the primary responding unit for the proposed FPA area and serves Grantville/Del Cerro and its surrounding areas. It is not anticipated at this time that additional fire stations would be necessary.

To direct fire station location timing and crew size planning as the community grows, the adopted fire unit deployment performance measures based on population density zones are listed in the Table 5.14-2. The implementation of the proposed FPA would lead to higher densities in Grantville and could require additional fire and life protection services. 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 this program-level of analysis, impacts related to the expansion construction would be less than significant.

C. Libraries

The proposed FPA could result in a net increase of 8,275 residential dwelling units and approximately 15,888 new residents at build-out, thus increasing the population utilizing the two San Diego Public library branches servicing the proposed FPA area. However, the existing Allied Gardens/Benjamin Library is scheduled to be upgraded once funding is identified. In addition, the Mission Valley Library that also services the proposed FPA area exceeds the General Plan requirement for dedicated library space, providing adequate services for future area residents. Furthermore, as required in the City's General Plan, any future residential developments in the proposed FPA area would make a fair share contribution to library facilities. Therefore, these two libraries would adequately service the increase in residents associated with the implementation of the FPA, and it is anticipated that impacts to libraries would be less than significant. As such no new library facilities would be required with implementation of the proposed FPA.

D. Parks/Recreational Facilities

Implementation of the proposed FPA could result in a net increase of 8,275 residential dwelling units and approximately 15,888 new residents at build-out. As such, the increase in population in the proposed FPA area would potentially increase the use of City park and recreational facilities by future residents. As shown in Table ~~5.14-5~~5.14-6, implementation of the proposed FPA would result in a population-based park surplus of approximately 3 acres and a deficit of approximately 12,000 square feet of recreational center space. ~~deficit of 19.2823.63 acres and a recreational center deficit of 1,618 square feet.~~ Based on the information provided in Table ~~5.14-5~~5.14-6, implementation of the proposed FPA would result in a need for new or altered park and recreational facilities to meet the General Plan requirement of 2.8 usable acres of population-based park per 1,000 residents. As such, impacts to parks and recreational facilities would be considered significant. However, any future development in the proposed FPA area would be required to contribute a proportionate fair-share to the construction of park and recreational facilities, as identified in the community plan~~needed~~, through the mandatory payment of DIFs. The Navajo PFFP identifies a number of proposed park and recreation projects needed in the Navajo Community to serve future residents and would be implemented as funding sources are identified. The construction of any new park and recreational facilities ~~that may be required~~ would be subject to environmental review pursuant to

CEQA at the time of plan design. Therefore, it is anticipated that impacts to parks and recreation would be less than significant with the implementation of the proposed FPA.

E. Schools

The cumulative potential increase in students from the proposed FPA, nearby proposed developments, and enrollment from existing nearby single-family residential neighborhoods would likely impact district schools to the point of reaching or exceeding capacity, requiring new or expanded school facilities. As such, potential impacts to schools would be considered significant. However, potential impacts to schools would be mitigated through payment of school impact fees by future developers on a project-specific basis, as required by Government Code Section 65996 and SB 50. The construction of any new school facilities would be subject to environmental review by SDUSD pursuant to CEQA at the time of design and approval of such facilities. Therefore, it is anticipated that impacts to schools would be reduced to a less than significant level with the implementation of the proposed FPA.

F. Roadway Maintenance

The increase in population that would result from implementation of the proposed FPA would likely increase the number of vehicles using roadway segments in the proposed FPA area on any given day, and impacts to roadways would be considered significant. However, implementation of the proposed FPA would include the adoption of the CPIOZ Type A designation, which would promote TOD within the proposed FPA area. ~~In addition, future development in the proposed FPA area would be required to contribute a proportionate fair share to the roadway improvements, as needed, through the mandatory payment of DIFs. The construction of any new roads that may be required would be subject to environmental review pursuant to CEQA at the time of design and approval.~~ Therefore, it is anticipated that impacts to roadways would be less than significant with the implementation of the proposed FPA.

5.14.2.3 Mitigation Framework

Developer fees, such as school impact fees and DIFs would serve as proportionate fair-share mitigation for any impacts to fire/life protection, libraries, parks and recreational facilities, schools, and roadways. The construction of any new or altered public facilities that may be needed would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Therefore, it is anticipated that impacts would be less than significant, and no mitigation measures are required.

5.14.3.4 Significance after Mitigation

No mitigation is required; therefore, there would be no impacts after mitigation.

5.14.4 Conclusions

The increase in population that would result with implementation of the proposed FPA would likely increase the need for public services and facilities, potentially to the extent that would require the construction of new or altered government facilities. However, the proposed FPA includes an update to the Navajo PFFP, with provisions for funding that would address financing opportunities for future developments, such as expansion of library facilities and roadway improvements in the proposed FPA area. In addition, any impacts related to fire/life protection, libraries, schools, parks and recreational facilities, and roadways

would be partially mitigated by state mandated developer fees and fair share contributions. While no new fire/life protection facilities were identified as being needed, the construction of any new public facilities that may be required would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Therefore, it is anticipated that impacts to public services and facilities would be less than significant with the implementation of the proposed FPA.

~~The increase in population that would result with implementation of the proposed FPA would likely increase the need for public services and facilities, potentially to the extent that would require the construction of new or altered government facilities. However, the proposed FPA includes an update to the Navajo PFFP, which would partially address financing opportunities that may be provided by future developments in the proposed FPA area. In addition, the proposed FPA includes a CPIOZ Type A designation, which would promote TOD within the Navajo Community Plan area, which has been demonstrated to reduce vehicle miles travelled (VMTs). Furthermore, any impacts related to fire/life protection, libraries, schools, parks and recreational facilities, and roadways would be partially mitigated by state mandated developer fees and fair share contributions. The construction of any new public facilities that may be required would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Therefore, it is anticipated that impacts to public services and facilities would be less than significant with the implementation of the proposed FPA.~~

5.15 Public Utilities

This section of the PEIR discusses the potential environmental impacts of the proposed FPA associated with public utilities.

5.15.1 Existing Conditions

5.15.1.1 Water

The City of San Diego Public Utilities Department (PUD) Water Branch provides potable water service to the proposed FPA area and the rest of the 1.3 million residents of the City. The PUD oversees a municipal water system that includes more than 3,300 miles of distribution pipeline, nine reservoirs with a total capacity of 415,000 acre-feet (AF), and an average of 200 million gallons of water delivered daily to customers. The City's PUD purchases up to 90 percent of its water from the San Diego County Water Authority (Water Authority), which itself purchases most of its water from the Metropolitan Water District (MWD). While the PUD imports the majority of its water, it also relies on local surface water, recycled water, and water conservation.

The City's water system consists of primarily nine raw water storage facilities with over 408,000 AF of storage capacity, three water treatment plants, 28 treated water storage facilities, and more than 3,294 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 water treatment plants have a total combined rated capacity of 294.4 million gallons per day (MGD).

For projects potentially affecting water and/or sewer lines, the California Department of Health Services Drinking Water Field Operations Branch requires notification if the separation between potable water and sewer or recycled water at any point is less than ten feet horizontal or one foot vertical. A minimum six-inch vertical separation is required to be maintained between the two utilities.

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 34,000 AF 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 Chapter 14 Article 7 Division 4~~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 Urban Water Management Plan (UWMP) which 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 supplies 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).

5.15.1.2 Sewer/Wastewater

The City of San Diego PUD provides wastewater collection, treatment, and disposal services to San Diego through its Metropolitan Sewerage System, serving a population of approximately 2.2 million residents in a 450 square mile service area (City of San Diego, 2014a). An average of 180 million gallons of wastewater is treated every day. The City of San Diego also operates and maintains the approximately 3,000-mile Municipal Sewerage Collection System for the collection and conveyance of wastewater from residences and businesses in the City treatment facilities. Wastewater is conveyed to the North City Reclamation Plant, the Point Loma Wastewater Treatment Plant, and the South Bay Water Reclamation Plant. The Point Loma facility processes approximately 160 million gallons per day of wastewater and has a treatment capacity of 240 million gallons per day. Treated effluent is discharged into the Pacific Ocean through two ocean outfalls, one at Point Loma and the other north of the International Border with Mexico. The two reclamation plants produce reclaimed water for appropriate uses (including plant operation and irrigation) and support the City's water service strategy of diversifying water supply sources to reduce future reliance on imported water (City of San Diego, 2008a). Reclaimed water is sold and distributed by the City. Solids from the wastewater treatment plants are processed at the Metro Biosolids Center located at Marine Corps Air Station Miramar.

There are nine major pump stations in the Metropolitan Sewerage System and 75 smaller pump stations throughout the Municipal Sewerage System. The largest pump stations 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 Point Loma Wastewater Treatment Plant through two 87-inch force mains.

The Navajo community is bounded by two major trunk sewers, which serve the communities in the El Cajon Valley and the City of La Mesa, as well as the Navajo community and adjacent communities. One large trunk sewer is located in Mission Gorge and the other is located in Alvarado Canyon. These two major trunk sewers are capable of serving a combined population of 300,000 people and related services (City of San Diego, 2008b).

5.15.1.3 Stormwater

Municipalities in San Diego County collect and discharge stormwater and urban runoff containing pollutants through their storm water conveyance systems. The San Diego Regional Water Quality Control Board (RWQCB) issues the required National Pollutant Discharge Elimination System (NPDES) permit to local jurisdictions, including the City of San Diego, which requires the implementation of programs to reduce pollutants in stormwater and urban runoff. The City of San Diego regulates stormwater discharge through the Storm Water Division of the Transportation and Storm Water Department.

The central and northerly portions of the proposed FPA area generally slope to the west toward the San Diego River, while the southerly portion of the proposed FPA area slopes towards Alvarado Creek, which runs through this portion of the proposed FPA area. The existing network of streets and storm drain systems discharge runoff from the proposed FPA area to these watercourses at several outlet points. Existing land uses in the analyzed watersheds include open space, single-family residential, multi-family residential, hospital/office, but mainly consist of office and industrial uses.

The proposed FPA area is divided into two major hydrologic basins, one draining to Alvarado Creek, and the other draining directly to the San Diego River. Alvarado Creek runs from east to west through the southerly portion of proposed FPA area, joining with the San Diego River near the southwesterly corner of proposed FPA area. Alvarado Creek extends approximately four miles east of the proposed FPA area, and its watershed includes portions of the Cities of San Diego and La Mesa, as well as Lake Murray. The watershed is predominantly developed, with the exception of portions of Mission Trails Regional Park. The onsite portions of the watershed drain to Alvarado Creek through a combination of storm drain systems and surface flow. Alvarado Creek also accepts offsite flow through the proposed FPA area from areas to the north and south of the proposed FPA area. As it flows through the proposed FPA area, portions of Alvarado Creek are conveyed in a lined channel, an underground culvert, and a semi-natural channel. The San Diego River forms the northwesterly and westerly boundaries of the proposed FPA area. The northerly and westerly portions of the proposed FPA area drain to the San Diego River through surface flow and storm drain systems. These storm drain systems also convey runoff from the adjacent residential area to the east through the proposed FPA area to the San Diego River. Runoff flows continue west for approximately nine miles in the San Diego River. Flows pass through developed portions of Mission Valley in a semi-natural channel before reaching areas of hardened channel slopes and discharging into the Pacific Ocean at the Dog Beach outlet in Ocean Beach.

5.15.1.3 Solid Waste

Solid waste disposal in the proposed FPA area is provided by the combined services of the City of San Diego's Environmental Services Department (ESD) and private contractors. 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). In accordance with the People's Ordinance, the City provides free solid waste collection services to primarily single-family homes, and some multi-family and commercial/business customers through General Fund monies. Most multi-family residences are required to fund and contract directly with private haulers for trash and recycling collection.

Solid waste generated in the City is primarily taken to three landfills. The majority of waste (that is not diverted) is disposed of at the Miramar Landfill, which is expected to be in operation through 2022 at current waste disposal rates. The Miramar Landfill is located at 5180 Convoy Street and is operated by the ESD's Refuse Disposal Division. The remaining waste goes to other landfills, including the Otay Landfill or Sycamore Landfill. These two landfills are currently owned and operated by Allied Waste Industries, a private waste management company that purchased the County of San Diego's solid waste system in 1997. Depending on how much waste is accepted, the Otay Landfill is projected to accept refuse through 2025, and the Sycamore Landfill through 2033 (City of San Diego, 2008a).

The Integrated Waste Management Act (IWMA) (AB 939) of 1989 was enacted by the California Legislature to address landfill capacity and solid waste disposal concerns. The IWMA established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance of solid waste facilities (CalRecycle, 1997). In addition, the IWMA requires each city or county to divert 50 percent of all solid waste through source reduction, recycling, and composting activities. In 2006, the City met this requirement with a 55 percent diversion rate. Today, the City is currently at a 67 percent diversion rate (City of San Diego, 2014b). To ensure continued compliance with the IWMA, the City adopted the Recycling Ordinance on November 13, 2007, and began phased implementation on January 1, 2008. The Recycling Ordinance established requirements for "recycling of recyclable materials generated from residential facilities (both single-family and multi-family), commercial facilities (including City buildings), and special events. These requirements are intended to increase the diversion of recyclable materials from landfill disposal, conserve the capacity and extend the useful life of the Miramar Landfill, reduce greenhouse gas emissions, and avoid the potential financial and other consequences to the City of failing to meet AB 939 requirements" (City of San Diego, 2007).

In 2011, the California Legislature enacted AB 341, which established a state policy goal to divert 75 percent of the solid waste generated in the state from disposal through source reduction, recycling, and composting activities by 2020 (CalRecycle, 2013). To ensure compliance with AB 341, the City amended the Recycling Ordinance in July 2012, lowering the exemption threshold from six cubic yards per week to four cubic yards per week. Thus, privately serviced businesses, commercial/institutional facilities, apartments, and condominiums generating four or more cubic yards of trash per week are required to recycle. The State's mandatory recycling program is also applicable to multi-family properties with five or more units.

5.15.1.4 Electricity and Natural Gas

Electrical power and natural gas service for the proposed FPA area is provided by the San Diego Gas and Electric Company (SDG&E), and is the primary provider throughout the San Diego metropolitan area.

Energy that is provided throughout California, including the proposed FPA area, is generated by numerous power plants that are located within and outside the State. Electricity and natural gas is supplied via the electric grid and transmission lines. The California Public Utilities Commission (CPUC) regulates SDG&E, as well as all other privately owned electric and natural gas companies. In addition to setting gas and electricity rates, the CPUC is responsible for ensuring that California utilities customers are provided with safe and reliable utility service and infrastructure at reasonable rates, protecting utilities customers from fraud, and promoting environmental enhancement and a healthy California economy (CPUC, 2007).

SDG&E's transmission system (69kV and above) is under the operational control of the California Independent System Operator (CAISO). Interconnection of generation facilities to the SDG&E transmission system is subject to the CAISO Federal Energy Regulatory Commission (FERC) approved Generation Interconnection Procedures (GIP) tariff. Projects proposing to interconnect to the SDG&E transmission system (transmission lines and substations) are studied in a cluster. In order to evaluate the feasibility of an individual project as it pertains to transmission capacity, all projects in that cluster need to be considered to identify the available capacity (SDG&E, 2014).

There are two electric transmission lines and one gas transmission line within the limits of the Navajo Community. At present, no additional electric transmission lines or electric substations are planned for the area. If additional transmission capacity is required, the existing lines would be reconducted within the existing easements. Additional electric distribution facilities would be added to serve additional load in the area as the need occurs (City of San Diego, 2008b).

The CalEEMod outputs from the Greenhouse Gas Analysis prepared for the proposed FPA were used to estimate energy usage for the existing land uses in the proposed FPA area (Section 5.3 of this PEIR). Using the CalEEMod outputs, the baseline condition of the proposed FPA area consisting of strip mall, general office building, and industrial park land uses results in an estimated annual electricity usage of approximately 19,007,770 kilowatt-hours (KWh) of electricity per year, and an estimated annual natural gas usage of approximately 24,092 million British thermal units (mmBTU) per year.

5.15.2 Significance Determination Thresholds

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact to public utilities would occur if the proposed FPA would result in:

- *A need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (e.g. natural gas, water, sewer, communication systems, solid waste disposal);*
- *The use of excessive amounts of fuel or energy (e.g. natural gas);*
- *The use of excessive amounts of power;*
- *The use of excessive amounts of water; and/or,*
- *Landscaping which is predominantly non-drought resistant.*

Addressed below are the key environmental issue areas that have been identified for the proposed FPA by the City as a result of the initial project review and consideration of comments received in response to the Notice of Preparation (NOP) (Appendix A).

5.15.3 Issue 1: Utilities Systems

Issue 1: Would the proposed FPA result in the need for new systems or require substantial alterations to existing utilities, the construction of which would create physical impacts (e.g. natural gas, water, sewer, communication systems, solid waste disposal)?

5.15.3.1 Impact Analysis

A. Water

Water is provided to the City of San Diego by the Metropolitan Water District in Los Angeles via the San Diego County Water Authority (Water Authority). Due to increased demand in the western states and increased environmental protections involving water sources, the City's supply of water is dependent on allocations of outside decision makers. Therefore, to meet the needs of the existing and future population, measures have been taken to protect and use the water allocation as efficiently as possible. In addition, state planning law requires water supply planning to be integrated into large-scale planning efforts, including community plans.

The proposed FPA would result in approximately 8,275 residential dwelling units. Under SB 610 (codified in the Water Code beginning at Section 10910), a water supply assessment (WSA) must be furnished to cities and counties for inclusion in any environmental documentation of projects (defined in the Water Code) that propose to construct 500 or more residential units, or that will use an amount of water equivalent to what would be used by 500 residential units, and are subject to the California Environmental Quality Act (CEQA). The City of San Diego Public Utilities Department prepared a WSA for the proposed FPA (see Appendix K).

Using the City's and Water Authority's 2010 Urban Water Management Plan (UWMP), the WSA concluded that there is sufficient water planned to supply the proposed FPA's estimated annual average usage. The projected water demands of the Project are 1,881,591 gallons per day (gpd) or 2,107 acre feet per year (AFY). In the City's 2010 UWMP, the planned water demands of this project site are 1,968,612 gpd or 2,205 AFY. The WSA concluded that there is sufficient water supply planned to serve the proposed FPA's future water demands within the Department service area in normal, single-dry year, and multiple-dry water year forecasts.

Future development within the proposed FPA area likely would increase demand for water services, which may result in the need to increase the size and capacity of existing pipelines and water mains. Water requirements for incoming development projects are administered by the City PUD. Additionally, water

demand is handled on a project-specific basis, where developers are required to submit a water study based upon Water Design Guidelines.

The FPA area is an urban, built environment; water infrastructure already exists in the area. Future development under the proposed FPA would have the potential to require the alteration of water facilities; however, the foreseeable alterations would not be substantial in nature. The adoption of the FPA would not require new facilities to be constructed. Existing facilities would be able to meet the demand from the development of the proposed FPA. The proposed FPA would not create the need for new water facilities or the need to substantially alter the existing water infrastructure, and thus, impacts would be less than significant.~~Due to the programmatic nature of the proposed FPA, the size, location, and type of specific development are not known at this time. Any future development allowed under the proposed FPA would need to be evaluated on a project specific basis for potential impacts to water facilities, and mitigation measures would be implemented accordingly. If future development in the proposed FPA area results in the need for new or substantial alterations to existing water systems, separate environmental review would be required at the time of facility design. All proposed public water facilities would be required to comply with the construction and design criteria outlined in the City's Water Design Guidelines, as well as any other applicable City regulations. Therefore, it is anticipated that impacts to water systems would be less than significant.~~

B. Sewer/Wastewater

Future development within the proposed FPA area likely would increase demand for sewer services, which may result in the need to increase the size and capacity of existing pipelines and sewer mains. Sewer requirements for incoming development projects are administered by the City Metropolitan Wastewater Department. Additionally, sewer demand is handled on a project-specific basis, where developers are required to submit a sewer study using the measurement of equivalent dwelling units (EDUs). Sewer trunk lines are continually monitored in the field by the City to determine the remaining levels of capacity. The Engineering Division plans its capital improvement projects several years prior to pipelines actually reaching capacity. According to the City's CEQA Significance Determination Thresholds, the Engineering Division has indicated that the City's existing sewer system will overall be able to accommodate future growth.

The FPA area is an urban, built environment; sewer/wastewater infrastructure already exists in the area. Future development under the proposed FPA would have the potential to require the alteration of sewer/wastewater facilities; however, the foreseeable alterations would not be substantial in nature. The adoption of the FPA would not require new facilities to be constructed. Existing facilities would be able to meet the demand from the development of the proposed FPA. The proposed FPA would not create the need for new sewer/wastewater facilities or the need to substantially alter the existing sewer/wastewater infrastructure, and thus, impacts would be less than significant. ~~Due to the programmatic nature of the proposed FPA, the size, location, and type of specific development are not known at this time. Any future development allowed under the proposed FPA would need to be evaluated on a project specific basis for potential impacts to wastewater facilities, and mitigation measures would be implemented accordingly. In addition, future developments would have to comply with the requirements described above, including the submittal of a sewer study. If future development in the proposed FPA area results in the need for new~~

~~or substantial alterations to existing sewer systems, separate environmental review would be required at the time of facility design. All proposed public sewer facilities would be required to comply with the construction and design criteria outlined in the City's Sewer Design Guidelines, as well as any other applicable City regulations. Therefore, it is anticipated that impacts to sewer systems would be less than significant.~~

C. Stormwater

As described in Section 5.7, Hydrology, of this PEIR, the proposed FPA area is currently developed and includes a variety of land uses, including open space, single-family residential, multi-family residential, commercial, hospital, office, and industrial. Total site discharge from future development projects within the proposed FPA would be reduced due to the expected decrease in impervious surfaces from that of the existing condition. Additionally, in compliance with current stormwater regulations, existing and proposed flows would be routed to on-site detention basins or bioretention facilities, which increase the time of concentration providing smaller intensities of flow. The City of San Diego would review grading plans and hydrology studies for each individual future project, and would maintain the authority to ensure that drainage patterns are not altered by future development projects within the proposed FPA. With the implementation of Mitigation Measure HYD-1, all future project-specific developments within the proposed FPA would be required to be reviewed by City staff, and potentially be required to prepare a project-specific hydrology study and WQTR for approval by the City of San Diego prior to project approval. In addition, all future development projects would be required to implement recommended BMPs and comply with the California BMP Handbook. Therefore, with implementation of Mitigation Measure HYD-1 and adherence to the SDMC and California BMP Handbook, all potential impacts to stormwater runoff associated with implementation of the proposed FPA would be reduced to a level less than significant.

D. Solid Waste

As previously discussed, the City of San Diego has adopted a number of ordinances and regulations to comply with the 50 percent diversion rate of solid waste from landfill disposal pursuant to AB 939. To ensure compliance with AB 341, which requires diversion of 75 percent of solid waste from landfill disposal, the City amended the Recycling Ordinance in July 2012, lowering the exemption threshold from six cubic yards per week to four cubic yards per week. Any future development projects that would result from implementation of the proposed FPA would have to comply with the City's Refuse and Recyclable Materials Storage Regulations, the Recycling Ordinance, and the Construction and Demolition (C&D) Debris Deposit Ordinance, among others. However, projections indicate diversion rates achieved through compliance with these regulations and ordinances alone would not be sufficient to achieve the 50 percent diversion rate (City of San Diego, 2011). To address this, the City's CEQA Significance Determination Thresholds requires that discretionary projects which have the potential to generate 60 tons of solid waste or more, are considered to have cumulative impacts on solid waste facilities and the project applicant would be required to prepare a Waste Management Plan (WMP). Projects that would typically exceed this threshold include the construction, demolition, and/or renovation of 40,000 square feet (sf) or more of building space.

It is anticipated that the solid waste disposal needs of future residents and businesses would increase as a result of implementation of the proposed FPA. Due to the programmatic nature of the proposed FPA, the size, location, and type of specific developments are not known at this time. Any future developments allowed under the proposed FPA would need to be evaluated on a project-specific basis for potential impacts to solid waste facilities.

5.15.3.2 Significance of Impact

A. Water

The WSA concluded that there is sufficient water supply planned to serve the proposed FPA's future water demands within the PUD's service area in normal, single-dry year, and multiple-dry water year forecasts.

The FPA area is an urban, built environment; water infrastructure already exists in the area. Future development under the proposed FPA would have the potential to require the alteration of water facilities; however, the foreseeable alterations would not be substantial in nature. The adoption of the FPA would not require new facilities to be constructed. Existing facilities would be able to meet the demand from the development of the proposed FPA. The proposed FPA would not create the need for new water facilities or the need to substantially alter the existing water infrastructure, and thus, impacts would be less than significant. ~~Future development within the proposed FPA area likely would increase demand for water services. Any future developments allowed under the proposed FPA would need to be evaluated on a project specific basis for potential impacts to water facilities, and mitigation measures would be implemented accordingly. In addition, future development in the proposed FPA area would have to comply with these City regulations, standards, and guidelines. With future project specific development in accordance with regulations, standards, and guidelines, it is anticipated that impacts to water systems would be less than significant.~~

B. Sewer/Wastewater

The FPA area is an urban, built environment; sewer/waste infrastructure already exists in the area. Future development under the proposed FPA would have the potential to require the alteration of sewer/waste facilities; however, the foreseeable alterations would not be substantial in nature. The adoption of the FPA would not require new facilities to be constructed. Existing facilities would be able to meet the demand from the development of the proposed FPA. The proposed FPA would not create the need for new sewer/waste facilities or the need to substantially alter the existing sewer/waste infrastructure, and thus, impacts would be less than significant.~~Future development within the proposed FPA area likely would increase demand for wastewater services. Any future developments allowed under the proposed FPA would need to be evaluated on a project specific basis for potential impacts to wastewater facilities, and mitigation measures would be implemented accordingly. In addition, future developments in the proposed FPA area would have to comply with all applicable City regulations, standards, and guidelines. With future project specific development in accordance with these regulations, standards, and guidelines, it is anticipated that impacts resulting from additional wastewater would be less than significant.~~

C. Stormwater

The City of San Diego would review grading plans and hydrology studies for each individual future project, and would maintain the authority to ensure that drainage patterns are not altered by future development projects within the proposed FPA. With the implementation of Mitigation Measure HYD-1, all future project-specific developments within the proposed FPA would be required to be reviewed by City staff, and potentially be required to prepare a project-specific hydrology study and WQTR for approval by the City of San Diego prior to project construction. In addition, all future development projects would be required to implement recommended BMPs and comply with the California BMP Handbook. Therefore, with implementation of Mitigation Measure HYD-1 and adherence to the SDMC and California BMP Handbook, all potential impacts from stormwater runoff, associated with implementation of the proposed FPA, would be reduced to a level less than significant. Therefore, it is anticipated that impacts resulting from stormwater would be less than significant.

D. Solid Waste

It is anticipated that implementation of the proposed FPA would increase the solid waste disposal needs of future residents and businesses. However, due to the programmatic nature of the proposed FPA, the size, location, and type of specific developments are not known at this time. Any future development projects that would result from implementation of the proposed FPA would have to comply with the City's Refuse and Recyclable Materials Storage Regulations, the Recycling Ordinance, and the Construction and Demolition (C&D) Debris Deposit Ordinance, among others. In addition, any future development in the proposed FPA area would need to be evaluated on a project-specific basis for potential impacts to solid waste facilities. With implementation of the Mitigation Framework as detailed in Mitigation Measure PU-1, impacts would be reduced to a level less than significant.

5.15.3.3 Mitigation Framework

Implementation of the proposed FPA has the potential to have a cumulatively significant solid waste impact. Implementation of the Mitigation Framework as detailed in Mitigation Measure PU-1 would reduce that impact to a level less than significant.

PU-1 Pursuant to the City's Significance Determination Thresholds, future subsequent development projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the Environmental Services Department and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following:

a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy).
b. Tons of waste anticipated to be generated (demolition, construction, and occupancy).
c. Type of waste to be generated (demolition, construction, and occupancy).
d. Describe how the project will reduce the generation of C&D debris.
e. Describe how the C&D materials will be reused on-site.

f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site.
g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling.
h. Describe how the waste reduction and recycling goals will be communicated to subcontractors.
i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project.
j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area.
k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase.
l. Describe any International Standards of Operation 1, or other certification, if any.

5.15.3.4 Significance after Mitigation

With implementation of the Mitigation Framework as detailed in Mitigation Measure PU-1, impacts would be reduced to a level less than significant.

5.15.4 Issue 2: Energy and Water Usage

Issue 2: Would the proposed FPA result in the use of excessive amounts of fuel or energy (e.g. natural gas), power or water?

5.15.4.1 Impact Analysis

A. Water

The Water Supply Assessment (WSA, Appendix G2) is a determination by the PUD as to whether sufficient water supplies will be available to meet the demand of the project. The WSA includes a discussion of the PUD's potable water system facilities, recycled water facilities, and its existing and projected water supplies. The WSA concluded there is sufficient water supply to serve the proposed FPA's future demand.

On December 10, 2013, the San Diego City Council approved the 2012 Long-Range Water Resources Plan (2012 LRWRP). The 2012 LRWRP is a long-range strategy document that evaluates water supply and demand-side objectives against multiple planning objectives. The 2012 LRWRP evaluated over 20 water supply options such as water conservation, recycled water, groundwater storage, brackish groundwater desalination, rainwater harvesting, graywater and potable reuse. The plan addresses the risk and uncertainty of future water supply conditions through the year 2035. It is intended to set the direction of where the City places its efforts in developing local water supplies. Conservation and water recycling programs have been implemented and are under investigation for ways to be expanded or increased. The City is also investigating the development of groundwater and potable reuse.

Additionally, the Conservation Element of the City's General Plan (Policy CE-A.11) sets goals and policies that development projects should 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 use "recycled water to meet the needs of development projects to the maximum extent feasible" to aid in water conservation. Municipal Code Chapter 14 Article 2 Division 4 requires projects to be comply with Landscape Regulations. Since future projects within the proposed FPA would have an adequate water supply, ~~and~~ will be consistent goals and policies identified in ~~comply with~~ the City's General Plan, and will comply with the Municipal Code, it is not anticipated that the proposed FPA would result in the use of excessive amounts of water.

Future development within the proposed FPA area likely would increase demand for water services, which may result in the need to increase the size and capacity of existing pipelines and water mains. Water requirements for incoming development projects are administered by the City PUD. Additionally, water demand is handled on a project-specific basis, where developers are required to submit a water study based upon Water Design Guidelines.

Due to the programmatic nature of the proposed FPA, the size, location, and type of specific developments are not known at this time. Any future development allowed under the proposed FPA would need to be evaluated on a project-specific basis for potential impacts to water facilities, and mitigation measures would be implemented accordingly. If future development in the proposed FPA area results in the need for new or substantial alterations to existing water systems, separate environmental review would be required at the time of facility design. All proposed public water facilities would be required to comply with the construction and design criteria outlined in the City's Water Design Guidelines, as well as any other applicable City regulations. Therefore, it is anticipated that impacts to water systems would be less than significant.

B. Fuel, Energy and Power

SDG&E provides electricity and natural gas services to residents and businesses within the proposed FPA area. According to the City of San Diego's CEQA Significance Determination Thresholds, power and gas requirements for upcoming development projects are addressed on a project-specific basis, and SDG&E consults with developers to incorporate energy saving devices into project design, where feasible.

Forecasting future electric power and natural gas consumption demand is performed on a continual basis by SDG&E. In situations where projects with large power loads are planned, these new large power loads are considered cumulatively with other existing or anticipated future loads in the project vicinity. Electrical substations are upgraded or new substations are built if capacities of existing substations are exceeded. Direct impacts to electrical and natural gas facilities are addressed and mitigated by SDG&E at the time incoming development projects occur. The proposed FPA is programmatic in nature, and thus does not include details regarding any specific development projects at this time. Therefore, impacts to energy resources can only be addressed with respect to the potential population increase in the proposed FPA area at buildout. CalEEMod was used to estimate energy usage for the proposed land uses, and the estimated output for electricity and natural gas is provided in Table 5.15-1 below.

Table 5.15-1: Estimated Annual Energy Consumption

Land Use	Natural Gas (mmBTU)	Electricity (kWh)
General Office Building	8,098.65	27,551,800
Office Park	5,594.25	1,047,190
Apartments High Rise	43,706.30	5,772,650
Apartments Mid Rise	1,661.19	2,923,360
Total Proposed	**59,060.39**	**37,295,000**
Total Existing	**24,092**	**19,00,770**

Notes: CalEEMod Model assumes compliance with Title 24 energy conservation requirements. Source: Rincon Consultants, Inc., 2014; BRG Consulting, Inc., 2014.

As shown in Table 5.15-1, the estimated energy consumption for the proposed land uses in terms of both natural gas and electricity usage greatly exceeds the energy that is currently consumed by the existing land uses. It is estimated that the buildout of the proposed FPA would result in approximately twice the consumption of electricity and approximately two and a half times the consumption of natural gas than the existing conditions. Depending on the size, type, and location of future individual development projects in the proposed FPA area, impacts resulting from increased natural gas and electricity usage would need to be addressed on a project-specific basis. Future discretionary projects in the proposed FPA area would be subject to environmental review pursuant to CEQA, and potential impacts associated with uses of power and energy would be addressed at that time. In addition, future developments would be required to comply with the mandatory energy standards of the California energy code (Title 24 Building Energy Standards of the California Public Resources Code), which include energy saving efficiencies that must be incorporated into all new developments. Title 24 contains requirements for structural, mechanical, electrical, and plumbing systems, and requires measures for energy conservation, green design, construction and maintenance (CBSC, 2010). Although implementation of the proposed FPA has the potential to drastically increase electricity and natural gas usage, it is anticipated that compliance with mandatory state, regional and local regulations requiring the utilization of energy conservation measures on a project-specific basis would reduce impacts associated with excessive energy and power consumption to a less than significant level.

~~With regard to fuel, the proposed FPA includes the Grantville Community Plan Implementation Overlay Zone (CPIOZ) Type A designation within the proposed FPA area. The CPIOZ provides supplemental development regulations and guidelines to implement Transit Oriented Development (TOD) within the Navajo Community Plan area, which would reduce reliance on the use of automobiles as the primary means of transportation. Implementation of TOD would reduce total vehicle miles traveled (VMT) and associated fuel consumption. The proposed FPA area, which is within an existing urbanized area adjacent to existing public transit, provides opportunities for increased transit ridership by future residents and visitors, which corresponds to reduced VMT. Therefore, no impacts associated with the use of excessive amounts of fuel are identified.~~

5.15.4.2 Significance of Impact

A. Water

Future development within the proposed FPA area likely would increase demand for water services. Any future development allowed under the proposed FPA would need to be evaluated on a project-specific basis for potential impacts associated with excessive water usage, and mitigation measures would be implemented accordingly. In addition, future development in the proposed FPA area would have to comply with all applicable City regulations, standards, and guidelines. With future project-specific development in accordance with regulations, standards, and guidelines, it is anticipated that impacts associated with excessive water usage would be less than significant.

B. Fuel, Energy, and Power

The proposed FPA has the potential to result in approximately twice the electricity consumption and approximately two and a half times the natural gas consumption at buildout when compared to the existing conditions. However, any future discretionary projects in the proposed FPA area would be subject to environmental review pursuant to CEQA, and potential impacts associated with uses of power and energy would be addressed on future project-specific basis. In addition, future development would be required to comply with mandatory state, regional and local regulations requiring the utilization of energy conservation measures on a project-specific basis. As such, it is anticipated that compliance with these regulations would reduce impacts associated with excessive use of power and energy to a less than significant level.

Implementation of the proposed FPA would include the adoption of CPIOZ Type A designation, which includes development guidelines and regulations to implement TOD. TOD would reduce reliance on the use of automobiles as the primary means of transportation, which would reduce total VMTs and associated fuel consumption. Therefore, it is anticipated that there would be no impacts associated with the use of excessive amounts of fuel.

5.15.4.3 Mitigation Framework

Although implementation of the proposed FPA has the potential to significantly increase electricity and natural gas usage, it is anticipated that compliance with mandatory state, regional and local regulations requiring the utilization of energy conservation measures on a project-specific basis would reduce impacts associated with excessive energy and power consumption to a less than significant level. In addition, the TOD component of the proposed FPA would reduce total VMTs and associated fuel consumption. Therefore, no mitigation measures are required at this time.

5.15.4.4 Significance after Mitigation

No mitigation is required; therefore, there would be no impacts after mitigation.

5.15.5 Issue 3: Landscape Elements

Issue 3: Would the proposed FPA utilize landscape elements which are predominantly non-drought resistant vegetation?

5.15.5.1 Impact Analysis

The proposed FPA is a land use amendment, and does not include any physical project-specific development. In addition, approval of the proposed FPA would not permit the construction of any individual project. Due to the programmatic nature of the proposed FPA, the size, location, and type of specific developments are not known at this time. The landscape elements of any future development allowed under the proposed FPA would need to be evaluated on a project-specific basis. However, future development would be required to conform to the applicable policies of the General Plan and the City's Landscape Standards requiring the use of drought-resistant vegetation as a landscape element. Therefore, it is anticipated that there would be no impacts associated with the use of non-drought resistant vegetation as a landscape element.

5.15.5.2 Significance of Impact

The proposed FPA is programmatic in nature, and thus does not include plans for any project-specific developments which may utilize non-drought resistant vegetation as a landscape element. However, any future developments in the proposed FPA area would be required to conform to the applicable policies of the General Plan and the City's Landscape Standards requiring the use of drought-resistant vegetation as a landscape element. Therefore, it is anticipated that there would be no impacts associated with the use of non-drought resistant vegetation as a landscape element.

5.15.5.3 Mitigation Framework

It is anticipated that there would be no impacts associated with the use of non-drought resistant vegetation as a landscape element; therefore no mitigation measures are required.

5.15.5.4 Significance after Mitigation

No mitigation is required; therefore, there would be no impacts after mitigation.

5.15.6 Conclusions

The proposed FPA would not result in any significant impacts water supply, wastewater, storm drainage, electricity and natural gas, and landscaping elements. The proposed FPA has the potential to have a cumulative solid waste impact. Implementation of the Mitigation Framework as detailed in Mitigation Measure PU-1 would reduce that impact to a level less than significant. The proposed FPA would not result in the need for new systems or require substantial alterations to existing utilities or infrastructure. Any future developments in the proposed FPA area would be required to comply with all applicable state, regional, and local regulations and policies. Therefore, there would be a less than significant impact to public utilities.

6.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

As required by Section 1516.2(c) of the CEQA Guidelines, the significant irreversible environmental changes of a project must be identified. Irreversible commitments of resources are evaluated to assure that their use is justified. Irreversible environmental changes typically fall into three categories: primary impacts, such as the use of nonrenewable resources; secondary impacts, such as highway improvements which provide access to previously inaccessible areas; and environmental accidents associated with a project.

Nonrenewable resources generally include biological habitat, agricultural land, mineral deposits, water bodies, and some energy sources. As evaluated in Section 5.6 – Biological Resources and Chapter 9.0 – Effects Not Found to be Significant, of this PEIR, adoption and subsequent implementation of the proposed FPA would not result in significant irreversible impacts to agricultural, biological, or mineral resources. Future development that could occur as a result of the implementation of the proposed FPA would entail the commitment of energy and natural resources. The primary energy source for operational lighting, heating, and cooling would be fossil fuels, representing an irreversible commitment of this non-renewable resource. Construction of future projects would also require the use of natural resources and construction materials, including cement, concrete, lumber, water, steel, other metals, etc., and labor. Although the City of San Diego Construction & Demolition (C&D) Debris Diversion Deposit Ordinance requires the diversion of at least 50% of construction materials to be recycled, the remainder of these resources would be irreversibly committed.

The application of the five new Community Commercial zones, along with the adoption of the new CPIOZ Type A designation, would promote mixed-use, transit-oriented development with pedestrian and bicycle orientation. These new zones may serve to reduce the irreversible commitment of fossil fuels associated with the transportation needs of future residents and visitors to the proposed FPA area.

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7.0 GROWTH INDUCEMENT

This section of the PEIR considers the ways implementation of the proposed FPA could directly or indirectly encourage economic or population growth in the surrounding environment. Induced growth is any growth which exceeds planned growth and results from new development (i.e., extension of infrastructure) which would not have taken place in the absence of the proposed project.

CEQA Guidelines Section 15126.2(d) requires that an EIR:

> *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 CEQA 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 and 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, "the analysis must avoid speculation and focus on probable growth patterns or projects."

The proposed rezoning from Industrial and low-density Community Commercial zones to higher-density Multiple-Unit Residential and Community Commercial zones would increase the allowable population densities up to 8,275 additional dwelling units and 388,300 square feet of additional commercial development which may eventually be developed within the proposed FPA area. Three of the proposed new Community Commercial zones (CC-3-6, CC-3-8, and CC-3-9) are considered to be high-density and would allow residential density ranges of up to 109 dwelling units per acre around the Grantville Transit Station. This would concentrate future population growth in an area where residential uses do not currently exist because they are prohibited by the existing Industrial-Light zoning.

As further detailed in Appendix C of this PEIR, San Diego's current population is 1,326,238. The proposed FPA could facilitate up to 8,275 dwelling units, generating an estimated 15,888 new residents over the 30-year life of the plan (based on an average household size of 1.92 persons). This would increase the City's estimated current population by 1.2% to 1,342,126 (see Table 5.3-5 of the Section 5.3 of this PEIR). By comparison, the population forecasts in the City's General Plan, upon which the RAQS is based, estimate the City's 2020 population at 1,514,336 (an increase of 188,098 people from the current population) and the 2030 population at 1,656,257 (an increase of 330,019 from the current population). According to these

forecasts, the increased population in the FPA would comprise 8.4% of the City's total estimated 2020 population increase and 4.8% of the City's total estimated 2030 population increase. See Table 5.3-6 of Section 5.3 of this PEIR for this comparison.

As a consequence of this induced growth in the FPA area, infrastructure in the proposed FPA area would likely require upgrades and expansion in order to accommodate the anticipated increase in demand on public services, facilities, and utilities. As discussed in Sections 5.14 and 5.15 of this PEIR, the update to the Navajo Public Facilities Financing Plan (PFFP), included as a component of this proposed FPA, would assure that public facility demands are adjusted to account for changes in future land use that will result from the proposed increase in residential density in the Grantville neighborhood. This includes facilities for governmental services such as police protection, fire/life safety protection, libraries, parks or other recreational facilities, and maintenance of roads and schools. As discussed in Section 5.15 of this PEIR, implementation of the proposed FPA is anticipated to indirectly result in increased demand for public utilities, including water, sewer, natural gas, ~~communication systems,~~ and solid waste disposal in the FPA area. This includes the construction of new water and sewer lines where none previously exist, which would be expected to occur if a multiple-unit residential building were to be constructed on property currently used as low-density industrial. Although the project may indirectly result in the extension of existing infrastructure, due to the concentration of redevelopment within an existing developed area, no new areas would open up for development as a result of the extension and no new systems would be required as a result of the proposed FPA. Therefore, although the proposed FPA does not propose any specific development, implementation of the FPA is expected to induce population growth as an indirect result of the potential future development that may occur within the proposed FPA area. However, the population growth would be concentrated and transit-oriented, which is more sustainable than the existing planned industrial uses. Implementation of the proposed FPA would make the Grantville area a vibrant pedestrian neighborhood, which would support a healthy local commercial economy with enhanced connectivity.

The City of San Diego population will grow over time regardless of whether the proposed FPA is adopted. The proposed FPA will provide for more sustainable development opportunities in the Grantville neighborhood areas to support the population growth. The proposed FPA promotes infill development and encourages the use of public transit. The proposed FPA is also intended to provide guidance for orderly growth and redevelopment in accordance with smart growth principals. Through the placement of higher density residential development in areas in and around transit and commercial corridors, the proposed FPA would result in the creation of a mixed-use urban environment that supports transit and pedestrian activity. The proposed FPA is growth accommodating, rather than growth inducing, because it provides comprehensive planning for the management of population growth and necessary economic expansion to support the development efforts. Therefore, the growth-inducing impact of the project is considered to be less than significant.

8.0 CUMULATIVE IMPACTS

CEQA Guidelines Section 15355 defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The CEQA Guidelines further state that the individual effects may be changes resulting from a single project or a number of separate projects; or the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Section 15130(b)(1) of the CEQA Guidelines allows for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

> ***List Method*** – A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the agency (if necessary).
>
> ***Projection Method*** – A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. This analysis relies on regional planning documents, in accordance with Section 15130(b)(1)(B), to serve as a basis for the analysis of the cumulative impacts of the FPA.

Pursuant to Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans and may be incorporated by reference. Also, no further cumulative impact analysis is required when a project is consistent with such plans, where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have already been adequately addressed in a certified EIR for that plan.

In addition, Section 15130(e) states that an EIR "should not further analyze a cumulative impact if it was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan."

This cumulative impacts discussion is based on the adopted Final Program EIR for the City General Plan that evaluated region-wide conditions pertaining to cumulative impacts. In accordance with State CEQA Guidelines Section 15130(b)(1)(B), the General Plan Final Program EIR's analysis of the cumulative effects relied on the regional growth projections provided by SANDAG's 2030 Regional Growth Forecast Update (Regional Growth Forecast).

The Regional Growth Forecast provides estimates and forecasts of employment, population, and housing for the period between 2004 and 2030. The Regional Growth Forecast and Final Program EIR for the General Plan are available for review at the City Planning and Community Investment Department.

According to the 2030 forecast, the year projected for build-out of the proposed FPA, the population of the City is projected to increase by 361,110 persons or approximately 28 percent between 2004 and 2030 to approximately 1,656,257 persons. The population of San Diego County (i.e., the unincorporated areas of the County and all of the incorporated cities) is projected to increase by 971,739 persons or approximately 32 percent between 2004 and 2030 to 3,984,753 persons. The number of housing units is projected to

increase by approximately 24 percent within the City and 26 percent within the County during from 2004-2030.

This analysis of cumulative impacts primarily relies on the cumulative impact determinations in the General Plan PEIR, and focuses on issues identified as potentially significant based on the analysis contained in Section 5.0, *Environmental Impact Analysis*, of this PEIR. The issues analyzed in this PEIR include land use, transportation/circulation, air quality and odor, greenhouse gas emissions, noise, biological resources, hydrology, water quality, historical resources, visual effects and neighborhood character, geologic conditions, paleontological resources, health and safety, public services and facilities, and public utilities.

In addition, the General Plan PEIR identified significant cumulative impacts to air quality, biological resources, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, traffic, visual effects and neighborhood character, and water quality. Consistent with Section 15130(e), where significance of cumulative impacts was previously identified for the General Plan PEIR, and the proposed FPA is consistent, those impacts do not need to be analyzed further. However, where the proposed FPA would add incremental effects to the issues identified above, the effects associated with the proposed FPA are also considered cumulatively significant.

8.1 Cumulative Analysis Setting

This cumulative impact analysis utilizes the projection method and relies on previously approved regional planning documents. Cumulative impacts for the proposed FPA were weighed against the Significance Determination Thresholds presented in Section 5.1 through 5.15 of this PEIR and the significant cumulative impacts identified in the City of San Diego General Plan PEIR.

City of San Diego General Plan

The comprehensive update to the City of San Diego's General Plan provided a policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans. The General Plan provides a strategy, the City of Villages, for how the City can enhance its many communities and neighborhoods as growth occurs over time. It presents ten elements that overall provide a comprehensive "blueprint" for the City of San Diego's growth over the next twenty plus years.

The City of Villages strategy aims to focus growth into mixed-used activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. The strategy focuses on the long-term economic, environmental, and social health of the City and its many communities. Implementation of the City of Villages strategy is an important component of the City's strategy to reduce local contributions to greenhouse gas emissions through more transit-oriented communities.

A broad examination of cumulative impacts involves considering the proposed FPA and the associated land use plan, together with growth of the City. Development pursuant to the General Plan would occur in accordance with the land use designations and development intensities identified in the Land Use and

Community Planning Element of the General Plan. The land uses and the associated potential development designated in the General Plan correlates to regional growth estimates made by SANDAG.

The population growth projected to occur by 2030, as discussed above, would necessitate augmentation of the City's current housing stock, infrastructure, and public services. Cumulative impacts would occur as a result of multiple projects developed by 2030. The strategy of the General Plan is to anticipate the cumulative effects of growth and plan for it in a manner that is balanced in its approach. The focused growth strategy addresses future growth as a whole, and proposes policies to avoid impacts on a cumulative basis.

SANDAG Regional Comprehensive Plan

The Regional Comprehensive Plan (RCP), prepared by the San Diego Association of Governments (SANDAG), is the strategic planning framework for the San Diego region. The scope of the RCP extends beyond the borders of San Diego County and considers planning and growth underway in Imperial, Orange and Riverside Counties, as well as in Baja California, Mexico. The policy recommendations contained in the RCP were heavily influenced by principles of sustainability and smart growth. A major emphasis of the RCP is to improve connections between land use and transportation. As such, the RCP identifies "Smart Growth Opportunity Areas" where compact, mixed-use, pedestrian-oriented development either exists now, is currently planned, or has the potential of future incorporation into local land use plans. SANDAG and local agencies designated the "Smart Growth Opportunity Areas" on a "Smart Growth Concept Map," which is being used as a planning tool to communicate with local jurisdictions and infrastructure providers about where smart growth should happen (SANDAG, 2004).

San Diego River Park Master Plan

The San Diego River Park Master Plan (City of San Diego, 2013) is a policy document that provides recommendations and guidelines to be considered in concert with land use decisions along the San Diego River. The goal of the plan is to create a continuous river park linking all 17.5 miles of the river within the City, and ultimately from its headwaters near Julian to the Pacific Ocean.

The plan divides the San Diego River into six segments, or reaches, that are based on topographic characteristics and river conditions. The six reaches include the Estuary (Pacific Ocean to I-5), the Lower Valley (I-5 to I-15), the Confluence (I-15 to Friars Road Bridge), the Upper Valley (Friars Road Bridge to Mission Trails Regional Park), and the Plateau (east of Mission Trails to the City of Santee). The reaches of the San Diego River within the proposed FPA area are the Confluence and Upper Valley Reach.

Each of the six reaches has its own distinct set of policy recommendations for development within the River Corridor Area and the River Influence Area. The Master Plan defines the River Corridor Area as all areas within 35 feet of the 100-year floodway (as defined by the Federal Emergency Management Agency [FEMA], as shown on Figure 5.1-2), and defines the River Confluence Area as areas within 200 feet of the River Corridor Area. The Master Plan recommendations describe general and specific strategies for addressing the ecological health of the river, facilitating human recreational use, as an amenity for

economic development, and how development should be reoriented toward the river to create value and provide identity for the San Diego River Park.

The Confluence reach is the area between I-15 and Friars Road Bridge, and includes the point where Alvarado Creek joins the San Diego River at the southwest corner of the proposed FPA area. Closer to the northern portion of the proposed FPA area, the reach is partially enclosed by a steep canyon wall on the west side of the river and industrial uses to the east. Encroaching development on the east and I-8 to the south further emphasize the sense of enclosure. The river corridor is also constrained by a series of old gravel mine ponds below the Friars Road bridge that impede the normal hydrologic activities of the river system. In this area, extensive exotic vegetation infestation is present both in the ponds and in the river.

The Upper Valley reach extends from the Friars Road bridge north to the western boundary of Mission Trails Regional Park, and includes the area located north of the Friars Road bridge, including a small portion of Admiral Baker Golf Course along the west bank of the San Diego River.

The Upper Valley is characterized by three hydrologic conditions: 1) the gravel extraction mine bordering Mission Trails Regional Park has channelized the river and disrupted habitat continuity through and across the mine site; 2) the river corridor through the mine site is infested with exotic plant species; and, 3) the river channel is interrupted by a series of ponds that obstruct the natural sediment transport processes of the stream.

8.2 Cumulative Impacts Found To Be Significant

Based on the analyses contained in *Chapter 5.0, Environmental Impact Analysis* of this PEIR, the project's contribution to cumulative land use (related to noise), transportation/circulation, air quality and odor, and noise impacts would be cumulatively considerable, as analyzed below.

8.2.1 Land Use (Noise)

The General Plan PEIR concludes that the gradual development of this region would result in significant, unavoidable cumulative land use impacts, and includes the adoption of mitigation measures that provide strategies for future individual development projects to apply in an attempt to reduce these impacts from future projects.

As discussed in Section 5.1 of this PEIR, *Land Use*, implementation of the proposed FPA would conflict with one goal in the Noise Element of the General Plan. Otherwise, the proposed FPA does not conflict with the stated goals, objectives, and recommendations of the City of San Diego General Plan, Navajo Community Plan, Tierrasanta Community Plan, College Area Community Plan, MSCP Subarea Plan, San Diego River Park Master Plan, Montgomery Field ALUCP, or SANDAG RCP.

The City of San Diego requires new projects to meet exterior noise level standards as established in the Noise Element of the General Plan. Traffic-related noise impacts are considered significant if project-generated traffic would result in exterior noise levels exceeding 65 dBA or interior levels exceeding 45 dBA for single and multi-family residences. If a project is currently at or exceeds the significance thresholds for

traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is not considered significant. Because noise levels within the proposed FPA area currently exceed the 65 dBA exterior criteria for residential uses, and the increase in future exterior noise levels is expected to be as high as 3 dBA, the increase in noise levels is considered a substantial permanent increase and a cumulative significant impact, which is inconsistent with the goals of the Noise Element of the City of San Diego's General Plan. With implementation of the Mitigation Framework as detailed Mitigation Measures N-1 through N-6, the potential significant noise impacts associated with temporary construction noise and/or operational noise associated with future development projects within the proposed FPA would be reduced to the extent feasible; however, operational noise impacts would not be reduced to below a level of significance. Therefore, cumulative noise impacts to sensitive receptors would remain significant and unmitigable. As such, because the increase in noise would not be consistent with the goals of the Nose Element of the General Plan, a cumulatively significant and unmitigable land use (related to noise) impact is identified with the implementation of the proposed FPA.

The proposed FPA would contribute to an overall increase in urban density within the proposed FPA area. The General Plan has anticipated these cumulative effects associated with a more urban and dense redevelopment environment and created specific design and planning standards, which are mirrored in the proposed FPA, to ensure an effective use of land within the FPA area. Despite the fact that the General Plan PEIR addressed the increase in density within urban areas, including the proposed FPA area, the greater density proposed could result in greater cumulative environmental impacts (quantitatively) related to traffic, air quality, noise, and historical resources (buildings and structures), all of which are discussed below. However, with respect to land use, because these effects were anticipated and addressed in the General Plan PEIR and the proposed FPA is in conformance with the policies of the General Plan, cumulative land use and planning impacts associated with implementation of the proposed FPA would be less than significant.

8.2.2 Transportation/Circulation

The future traffic volumes (Year 2030) presented in Section 5.2 of this PEIR, *Transportation/Circulation*, are based on output from the SANDAG Regional Series 11 Traffic Model. The Series 11 Traffic Model is an approved SANDAG model that assumes additional area-wide traffic growth. The traffic model provided forecasted ADT volumes for the proposed FPA. Land use assumptions contained in the SANDAG Model within the study area were reviewed and updated as required prior to running the model for the proposed FPA. Land use and network assumptions outside of the proposed FPA area were consistent with the approved Series 11 land use and network assumptions.

Because the proposed FPA would not directly result in development of new or expanded uses, the analysis of potential impacts to transportation/circulation discussed in Section 5.2 of this PEIR was conducted at a plan level and is indicative of the potential cumulative impacts. The General Plan PEIR identified a cumulative impact to roadway LOS due to future Community Plan updates that could alter planned land uses and transportation. However, the General Plan PEIR analyzed the resulting increase in VMT on roadways within the City rather than specific roadways. Thus, the proposed FPA's contribution to the identified city-wide significant cumulative impact is determined to be cumulatively considerable,

specifically as it pertains to the intersections, roadway segments, freeway segments, and freeway ramps located within the proposed FPA area, as discussed within this PEIR.

As discussed in Section 5.2, the proposed FPA would result in cumulatively significant impacts at nine intersections, fifteen street segments, eight freeway segments, and one freeway ramp. With implementation of the Mitigation Measures T-1 through T-23 and T-27 through T-37, many of the cumulative impacts resulting from the proposed FPA would be reduced to a level less than significant, and in many cases, improve upon the existing traffic situation. However, a number of mitigation measures are not feasible, and cumulative impacts to the affected intersections and roadway segments would remain significant and unmitigable. Implementation of the proposed FPA would generate a significant number of new vehicular trips to the proposed FPA area. Implementation of the Mitigation Framework as detailed in Mitigation Measures T-24 through T-26, which require pedestrian, bicycle, and transit improvements, as well as a preparation of a TDM program to ensure compliance with the Navajo Community Plan Circulation Element, would reduce impacts to a less than significant level. As such, the proposed FPA would not increase traffic hazards to motor vehicles, bicyclists, or pedestrians. However, even with the implementation of Mitigation Measures T-1 through T-23 and T-27 through 37, which specifically addresses impacts to intersections, roadway segments, freeway segments, and freeway ramps, the proposed FPA's cumulative transportation/circulation impacts to several intersections and roadway segments would remain significant and unmitigable.

8.2.3 Air Quality and Odor

While air quality in the SDAB has generally improved over recent decades due to auto emissions and other emissions restrictions and improved technologies, the SDAB is currently in non-attainment for federal and state ozone standards and state PM_{10} and $PM_{2.5}$ standards, and is unclassifiable for the federal PM_{10} standard. Past development has contributed to this condition, and future development forecasted for the region would generate increased pollutant emission levels from transportation and stationary sources. Because the SDAB is in non-attainment for ozone, $PM_{2.5}$, and PM_{10}, any potential increase in emissions of these criteria pollutants resulting from development would potentially pose cumulatively considerable and significant air quality effects.

Cumulative assessment of air quality impacts to the SDAB relies on assessment of project consistency with the adopted RAQS and SIP. The RAQS and SIP are based on growth forecasts for the region, which are in turn based on maximum build-out of land uses as allowed in the adopted community and general plans. Potential cumulative air quality impacts would thus be reduced through achievement of emission levels and reduction strategies identified in the RAQS. The potential population increase associated with build-out of the proposed FPA would be within the RAQS population forecasts, and thus would conform to the RAQS and SIP.

As further discussed in Section 5.3 of this PEIR, *Air Quality and Odor*, implementation of the proposed FPA has the potential to result in cumulative significant and unmitigable long-term operational air quality impacts resulting from cumulatively considerable increases in criteria pollutants, some of which the SDAB is currently under federal and/or state non-attainment. While it is anticipated that emissions from

construction of individual development projects allowed under the proposed FPA would not result in significant air quality impacts, the potential exists for cumulatively considerable emissions to occur should multiple projects be constructed simultaneously. However, with implementation of the Mitigation Framework as detailed in Mitigation Measures AQ-1 and AQ-2, short-term cumulative impacts would be reduced to a less than significant level, but long-term cumulative operational air quality impacts would remain cumulatively significant and unmitigable.

8.2.4 Noise

The General Plan PEIR states that the goals, policies, and recommendations of the General Plan and compliance with federal, state, and local regulations would, in general, preclude impacts related to the incremental exposure of sensitive receptors to increased ambient noise levels along major transportation corridors and within the vicinity of new stationary sources. However, the potential for exposure of sensitive receptors to increased noise related to roadways and stationary sources exists, and would be considered a cumulatively significant impact.

As discussed in Section 5.5 of this PEIR, future development activities associated with the implementation of the proposed FPA have the potential to result in significant temporary construction noise impacts. However, compliance with the SDMC and implementation of Mitigation Measures N-1 through N-5 would reduce cumulative construction noise impacts to a level less than significant.

Future development activities that may result from implementation of the proposed FPA have the potential to result in the exposure of noise-sensitive land uses to future operational noise levels which exceed applicable standards; a substantial increase in existing ambient noise levels; or, increased land use incompatibilities associated with noise. Compliance with the federal, state, and local noise regulations, as well as the implementation of Mitigation Measures N-1 and N-6 would help to avoid, minimize, and reduce potential project-specific operational noise impacts; however, the reduction of impacts to below a level of significance cannot be achieved for the proposed residential uses along the northern portion of Fairmount Avenue. Therefore, implementation of the proposed FPA would result in cumulatively significant and unmitigable impacts related to operational noise.

8.3 Cumulative Impacts Found Not To Be Significant

Based on the analyses contained in ***Chapter 5.0, Environmental Analysis*** of this PEIR, the project's contribution to cumulative greenhouse gas emissions, biological resources, hydrology, water quality, historical resources, visual effects/neighborhood character, geologic conditions, paleontological resources, health and safety, public services and facilities, and public utilities impacts would not be cumulatively considerable, as analyzed below.

8.3.1 Greenhouse Gas Emissions

The General Plan PEIR concluded that the cumulatively considerable incremental contribution to worldwide GHG emissions resulting from citywide development would be considered cumulatively

significant. As such, the City's General Plan contains policies that would reduce GHG emissions from transportation and operational building uses (related to water and energy consumption, and solid waste generation, etc.). These policies are consistent with the goals and strategies of local and State plans, aimed at reducing GHG emissions from land use and development. These goals, policies, and recommendations provide a framework for developing project level GHG protection measures for future development.

As discussed in Section 5.4 of this PEIR, ***Greenhouse Gas Emissions***, the future development associated with the implementation of the proposed FPA would result in approximately 87,367 $MTCO_2E$ per year. However, with the implementation of emissions reduction measures, the operational emissions would be reduced by 44.2%, which meets and exceeds the 28.3% reduction goal of AB 32 and the City of San Diego. In addition, the proposed FPA would be consistent with applicable, policies, and regulations adopted for the purpose of reducing GHG emissions, and would not conflict with the City's sustainable community program, Climate Protection Action Plan, General Plan, or CAP. Therefore, the implementation of the proposed FPA would not contribute to a cumulatively significant greenhouse gas emissions impact.

8.3.2 Biological Resources

As discussed in Section 5.6 of this PEIR, ***Biological Resources***, future development activities located adjacent to sensitive resources or the MHPA that would be allowed per the proposed FPA have the potential to result in direct and indirect impacts to biological resources. However, when viewed together with the citywide loss of biological resources identified in the General Plan PEIR, the potential incremental contribution from projects allowed under the proposed FPA would be minimal since the proposed FPA area is mostly developed. As discussed in Section 5.1 of this PEIR, ***Land Use***, any future development located adjacent to the MHPA would need to incorporate the Mitigation Framework as detailed in Mitigation Measure~~s~~ LU-1 ~~through LU-3~~ and would be required to comply with the MHPA Land Use Adjacency Guidelines to address land use impacts related to the MHPA. In addition, compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations, the implementation of the Mitigation Framework as detailed in Mitigation Measures BR-1 through BR-~~6~~ 5 and the associated mitigation elements identified in Section 5.6.9 would reduce the proposed FPA's contribution to potential cumulative biological resources impacts to a level less than significant.

8.3.3 Hydrology

The General Plan PEIR concluded that incremental hydrological impacts related to absorption rates, drainage patterns, and/or rates of surface runoff, when viewed in connection with hydrological impacts elsewhere in the region, are considered to result in a cumulatively significant impact. However, as discussed in Section 5.7 of this PEIR, ***Hydrology***, future development projects associated with the implementation of the proposed FPA area would result in a cumulatively beneficial impact to hydrology and no significant adverse impacts have been identified. The total site discharge would be reduced by decreasing the amount of impervious surfaces from that of the existing condition. Additionally, existing and proposed flows would be routed to on-site detention basins or bioretention facilities, which increase the time of concentration providing smaller intensities. The City of San Diego would review grading plans and hydrology studies from each individual future project, and would maintain the authority to ensure that

drainage patterns are not altered by future development projects within the proposed FPA. With the implementation of the Mitigation Framework as detailed in Mitigation Measure H-1, all future project-specific development within the proposed FPA would be required to be reviewed by City staff, and potentially be required to prepare a project-specific hydrology study and WQTR for approval by the City of San Diego prior to project construction. In addition, all future development projects would be required to implement recommended BMPs and comply with the California BMP Handbook. Therefore, with implementation of the Mitigation Framework as detailed in Mitigation Measure H-1 and adherence to the SDMC and California BMP Handbook, potential cumulative hydrology impacts associated with implementation of the proposed FPA would be reduced to a level less than significant.

8.3.4 Water Quality

The General Plan PEIR concluded that incremental water quality impacts, when viewed in connection with water quality impacts elsewhere in the region, are considered to result in a cumulatively significant impact. However, as discussed in Section 5.8 of this PEIR, ***Water Quality***, implementation of the proposed FPA has the potential to have a significant impact on water quality. Implementation of the proposed FPA is expected to result in an increase in runoff volumes and peak flow rates for certain drainage basins which outlet into wetland vegetation communities located within the San Diego River and Alvarado Creek. Adherence to federal, state, and local regulations would serve to reduce significant impacts to a degree, but cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Implementation of the Mitigation Framework as detailed in Mitigation Measure H-1 would reduce the cumulative water quality impacts to a level less than significant.

8.3.5 Historical Resources

The General Plan PEIR states that the continued pressure to develop or redevelop areas would result in incremental impacts to historical resources in the San Diego region, and was identified as a cumulatively significant impact. Regardless of the efforts to avoid impacts to cultural resources, the more that land is converted to developed uses, the greater the potential for impacts to cultural resources. However, the proposed FPA would be implemented on land that is already developed.

While the proposed FPA could result in direct impacts to historical resources (buildings and structures), the goals, policies, and recommendations of the Historic Preservation Element of the General Plan, combined with the federal, state, and local regulations described in Section 5.9 of this EIR, ***Historical Resources***, provides a framework for developing project-level historical resources mitigation measures for future discretionary projects. All future discretionary project submittals under the proposed FPA shall be subject to site-specific review in accordance with the HRR and guidelines. 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.

As further discussed in Section 5.9 of this PEIR, ***Historical Resources***, future development projects associated with the implementation of the proposed FPA that are subject to a ministerial or discretionary permit will be reviewed for impacts to historic resources and will be required to incorporate feasible mitigation measures,

such as Mitigation Measure HR-1, adopted in conjunction with the certification of the project-specific CEQA review when a historic resource is present. With implementation of the Mitigation Framework as detailed in Mitigation Measure HR-1, impacts would be less than significant.

The General Plan PEIR stated that the continued pressure to develop or redevelop areas would result in incremental impacts to archaeological resources and prehistoric human remains in the San Diego region, and was identified as a cumulatively significant impact. Regardless of the efforts to avoid impacts to resources, the more that land is converted to developed uses, the greater the potential for impacts to archaeological resources and prehistoric human remains. While any individual project may avoid or mitigate the direct loss of a specific resource, the effect would be cumulatively considerable, and therefore would result in a cumulatively significant impact.

As discussed in Section 5.9 of this PEIR, *Historical Resources*, future development projects associated with the implementation of the proposed FPA that are subject to a ministerial or discretionary permit, will be reviewed for impacts to historic resources and will be required to incorporate feasible mitigation measures, such as Mitigation Measure HR-2, adopted in conjunction with the certification of the project-specific CEQA review when a historic resource is present. Compliance with the California Public Resources Code and State Health and Safety Code in the event that human remains are encountered during future development of the proposed FPA area, in addition to the above mitigation measure, would reduce cumulative impacts to human remains to a level less than significant.

In addition, although no archaeological resources were found within the proposed FPA area, there is a potential for encountering archaeological resources during future construction development as a result of implementation of the proposed FPA. However, with the implementation of the Mitigation Framework as detailed in Mitigation Measure HR-2, as described in Section 5.8.4.3, cumulative impacts to archaeological resources would be reduced to a level less than significant.

8.3.6 Visual Effects/Neighborhood Character

Generally, the cumulative study area associated with aesthetic impacts is the geographic area from which a project is likely to be seen, based on topography and land use patterns. The cumulative study area included in the General Plan PEIR was the entire San Diego region. This area consists of a varying degree of significant landscape features and landforms. The General Plan PEIR concluded that the gradual development of this region would result in cumulatively significant aesthetic impacts. The General Plan PEIR includes the adoption of mitigation measures that provide strategies for future individual development projects to apply in an attempt to reduce significant visual impacts from future projects.

As discussed in Section 5.10 of this PEIR, *Visual Effects/Neighborhood Character*, implementation of the proposed FPA would result in less than significant impacts related to visual effects and neighborhood character. As future development activities proceed within the proposed FPA area, each individual development proposal shall be reviewed by the City to comply with the development standards of the City of San Diego Land Development Code and the adopted design guidelines of the City of San Diego

General Plan – Urban Design Element, Navajo Community Plan, and San Diego River Park Master Plan. Therefore, cumulative impacts to visual effects and neighborhood character would be less than significant.

8.3.7 Geologic Conditions

As discussed in Section 5.11 of this PEIR, *Geologic Conditions*, the major geologic hazards associated with the proposed FPA area include strong seismic shaking, landslides, liquefaction, and seismically induced settlement. The General Plan PEIR identified a cumulatively significant impact related to such hazards. However, as discussed in Section 5.11 of this PEIR, with implementation of Mitigation Measure GC-1, the proposed FPA would result in less than significant impacts associated with the above geologic conditions and hazards. Impacts associated with geologic hazards would be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts would also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code. As such, cumulative geologic conditions impacts would be less than significant.

8.3.8 Paleontological Resources

The General Plan PEIR concluded that impacts to paleontological resources, similar to cultural resources, would be cumulatively significant. For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), the General Plan PEIR identified site-specific measures listed within the Mitigation Framework which would reduce significant project-level incremental paleontological resources impacts to a less than significant level.

As discussed in Section 5.12 of this PEIR, *Paleontological Resources*, the proposed FPA area is underlain by geologic formations characterized as highly sensitive in regards to the potential presence of paleontological resources. Any future development projects under the proposed FPA which propose grading of 1,000 cubic yards or more and would extend to a depth of 10 feet or greater within areas of high paleontological sensitivity have the potential to result in significant impacts to paleontological resources. However, mitigation measures consistent with those identified in the General Plan PEIR have been provided in Section 5.12 of this PEIR to reduce potential impacts to below a level of significance. As such, implementation of the Mitigation Framework as detailed in Mitigation Measure PR-1 would reduce potential cumulative impacts to paleontological resources to a level less than significant.

8.3.9 Health and Safety

The General Plan PEIR concluded that the population growth occurring during implementation of the General Plan may result in an incremental increase in the number of people exposed to hazards (e.g., wildland fires, aircraft operations accidents, and flooding). Adoption of mitigation measures was included that provides strategies for future individual development projects to apply in an attempt to reduce significant impacts to human health and safety from future projects. However, 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 the program level, the General Plan PEIR concluded that there was a cumulatively significant impact to human health and safety.

As discussed in Section 5.13 of this PEIR, ***Health and Safety***, the proposed FPA would not impair implementation of, or physically interfere with an adopted emergency response or evacuation plan. The proposed FPA would have the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires, but this impact would be reduced to a level less than significant with the implementation of the Mitigation Framework as detailed in Mitigation Measure HS-1. Overall, implementation of the proposed FPA is not anticipated to result in increased generation of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or wastes. However, soil and/or groundwater that have been impacted by releases of hazardous materials or petroleum products from surficial spills, subsurface releases from USTs, or other sources, may be disturbed during future project construction activities, which would be considered a potentially significant cumulative health and safety impact. Accordingly, implementation of the Mitigation Framework as detailed in Mitigation Measures HS-2 through HS-12, described in Section 5.13, would reduce cumulative health and safety impacts associated with hazardous materials/waste to a less than significant level.

8.3.10 Public Services and Facilities

As discussed in Section 5.14 of this PEIR, ***Public Services and Facilities***, the increase in population that would result with implementation of the proposed FPA would likely increase the need for public services and facilities, potentially to the extent that would require the construction of new or altered government facilities. The General Plan PEIR identified that a cumulatively significant impact exists relative to public services and facilities. However, the proposed FPA includes an update to the Navajo PFFP, which provides a plan for financing public facilities through developer impact fees and other mechanisms. In addition, the proposed FPA includes a CPIOZ Type A designation, which would promote TOD within the Navajo Community Plan area which has been demonstrated to reduce vehicle miles travelled (VMTs), and thus would reduce impacts to roadways that may require maintenance. Furthermore, any cumulative impacts related to fire/life protection, libraries, schools, park and recreational facilities, and roadways would be partially mitigated by state mandated developer fees and fair share contributions. The construction of any new public facilities that may be required would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Therefore, cumulative impacts to public services and facilities would be less than significant with the implementation of the proposed FPA.

8.3.11 Public Utilities

The General Plan PEIR concluded that a cumulatively significant impact to public utilities exists, particularly to public utilities infrastructure and excessive energy consumption. Although the City's existing built areas are currently served by water, solid waste, storm water infrastructure, and public utilities infrastructure, some of the City's existing built areas currently have existing infrastructure deficiencies. Due to the existing infrastructure deficiencies in some of the built areas of the City and the potential for excessive energy consumption, new or improved public utilities infrastructure would be required to meet the increased needs of the City's future growth occurring through infill and redevelopment.

The General Plan PEIR concluded that there is no cumulatively significant impact to the water supply. The Water Supply Assessment (WSA) prepared for the proposed FPA determined that there is sufficient water

planned to supply the proposed FPA's estimated annual average usage. The projected water demands of the Project are 1,881,591 gallons per day (gpd) or 2,107 acre feet per year (AFY). In the City's 2010 UWMP, the planned water demands of this project site are 1,968,612 gpd or 2,205 AFY. The WSA concluded that there is sufficient water supply planned to serve the proposed FPA's future water demands within the Department service area in normal, single-dry year, and multiple-dry water year forecasts.

When added to other past, existing, and future planned development, implementation of the proposed FPA would contribute incrementally to the demand for public utility services. However, as discussed in Section 5.15 of this PEIR, ***Public Utilities***, the proposed FPA would not result in any significant impacts to public utilities, including water supply, wastewater, storm drainage, solid waste, electricity and natural gas, and landscaping elements. The proposed FPA would not result in the need for new systems or require substantial alterations to existing utilities or infrastructure. Any future developments in the proposed FPA area would be required to comply with all applicable state, regional and local regulations and policies. Therefore, the cumulative impact to public utilities from the implementation of the proposed FPA is less than significant.

9.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines §15128 requires that an 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 FPA are Agricultural Resources and Mineral Resources.

9.1 Agricultural Resources

9.1.1 Farmland Mapping and Monitoring Program

Based on the farmland maps prepared by the *California Department of Conservation* (2006), the proposed FPA area is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The proposed FPA area is located within an urbanized area and there are no existing agricultural lands or agricultural uses in the proposed FPA area. Therefore, there would be no impact to prime farmland, unique farmland of statewide importance.

Furthermore, based on the Soil Survey for the San Diego Area, several different soil series have been mapped in the proposed FPA area. These soil types and their characteristics are summarized in Table 5.11-1 in Section 5.11, Geologic Conditions. The potential for loss of agricultural soils due to further development of the proposed FPA area is considered negligible since the majority of the proposed FPA area has been extensively developed and is no longer in its natural state. The potential for loss of agricultural soils due to development is a concern in undeveloped areas (Ninyo and Moore, 2013).

9.1.2 Agricultural Zoning/Williamson Act

The proposed FPA area is not zoned for agriculture and is not under a Williamson Act contract. Therefore, no impact is identified for this issue area.

9.1.3 Forest, Timberland, Timberland Production Zone

The proposed FPA area is located within an urbanized area. There are no existing forestlands, timberlands, or timberland zoned Timberland Production either within the proposed FPA area or in the immediate vicinity that would conflict with existing zoning or the proposed rezoning (ESRI, 2008). Therefore, no impact is identified for this issue area.

9.1.4 Loss of Forest Land

The proposed FPA area is located within an urbanized area. There are no existing forestlands either within the proposed FPA area or in the immediate vicinity (ESRI, 2008). The proposed FPA area 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.

9.1.5 Natural Conversion of Farmland or Forest

The proposed FPA area is located within an urbanized area; there are no existing agricultural and forestland or uses either on-site or in the immediate vicinity (ESRI, 2008). The proposed FPA area 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.

9.2 Mineral Resources

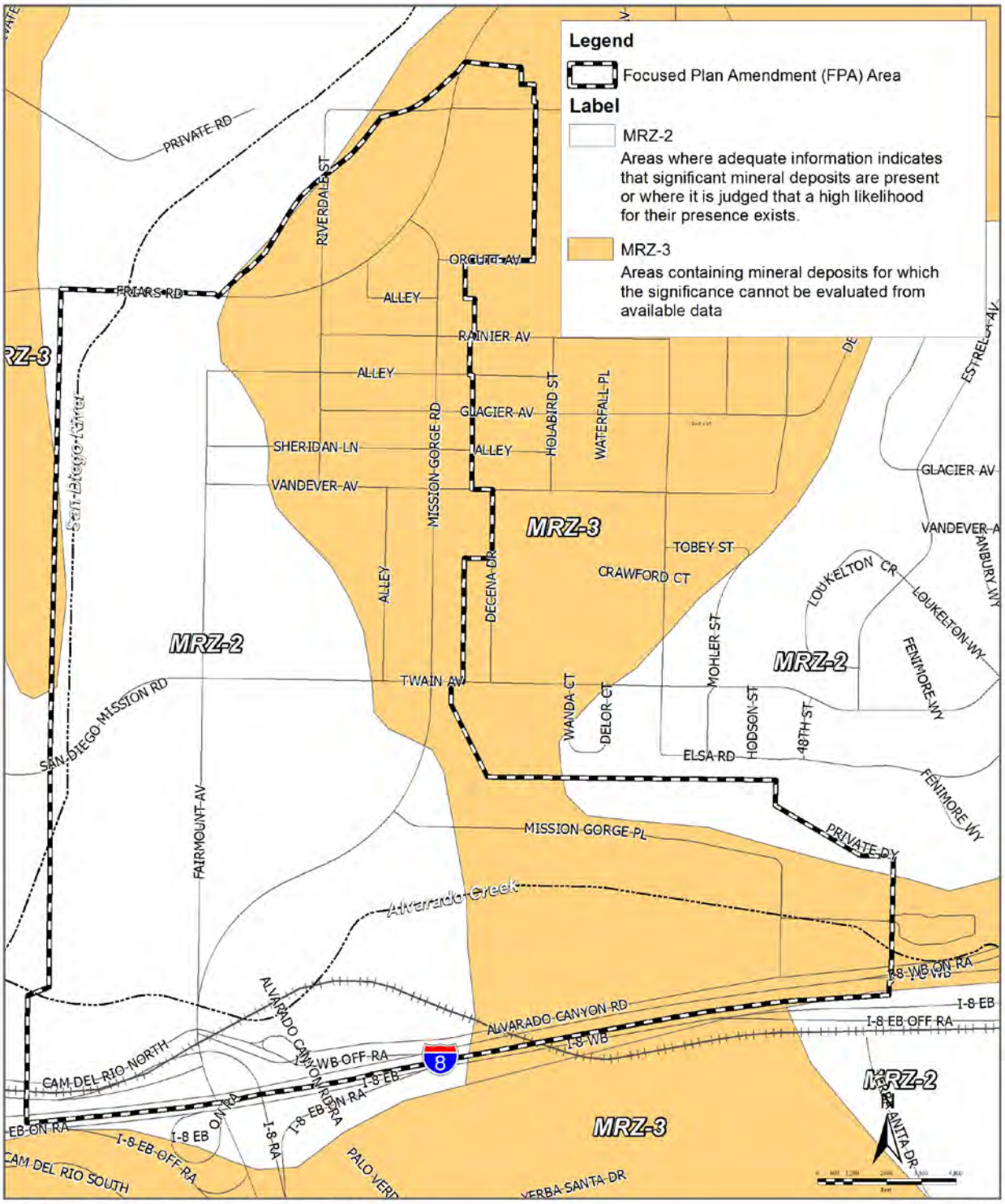
According to the California Department of Conservation (CDC), Division of Mines and Geology, the proposed FPA area is designated with two Mineral Land Classifications:

MRZ-2: Areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists; and

MRZ-3: 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. As shown on Figure 10-1, the southwestern portion of the proposed FPA area adjacent to the San Diego River is located in MRZ-2, while the northeastern portion is located in MRZ-3. Based on a review of referenced data, the proposed FPA area is in an urban area where the potential for loss of mineral deposits due to further development is considered low (Ninyo and Moore, 2013).

In addition, the proposed FPA area is located entirely within a developed urban area and does not require the acquisition of additional land. Furthermore, the proposed FPA will 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 this proposed FPA. Therefore, no impact is identified for this issue area.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

CITY OF SAN DIEGO
PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Mineral Resource Zones

FIGURE
9-1

10.0 ALTERNATIVES

In considering the appropriateness of a project, CEQA mandates that alternatives to its implementation be discussed. State CEQA Guidelines Section 15126.6(a) requires the discussion of "a range of reasonable alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." State CEQA Guidelines Section 15126.6(f) further states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Thus, the following discussion focuses on those alternatives that are capable of reducing or eliminating significant environmental impacts, even if they would impede the attainment of some project objectives, or would be more costly. In accordance with State CEQA Guidelines Section 15126.6(f)(1), among the factors that may be taken into account when addressing the feasibility of alternatives are (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site. Table 10-1 provides a comparison of the following alternatives addressed in this chapter:

- No Project Alternative (Current Adopted Community Plan)
- Reduced Density Alternative (<43 dwelling units [du]/acre)
- Reduced Density Alternative (<73 du/acre)
- Alternative Site Location Alternative

10.1 Goals/Objectives

In developing the alternatives to be addressed in this chapter, consideration was given to meeting the basic objectives of the project and eliminating or substantially reducing significant environmental impacts. The following goals presented in Chapter 3.0 have been identified for the proposed FPA and include:

- Promote planning, redesign, and development of areas that are underutilized;
- Promote Transit Oriented Development within walking distance to the Grantville Trolley Station, with a mix of residential, commercial, and industrial uses that would be designed for the pedestrians without excluding automobiles;
- Provide more market-rate and affordable housing opportunities consistent with a land use pattern that promotes infill development and socioeconomic equity;
- Promote a Multi-Modal Transportation Strategy including walkable and bicycle-friendly streets, accessible and enhanced transit options, and comprehensive parking strategies throughout the community;
- Provide an incentive for development within the Grantville Community Plan Implementation Overlay Zone (CPIOZ) by streamlining the permit processing requirements in order to ensure a less costly and time-intensive process;

- Allow for the ability to reduce vehicle miles traveled and reduce associated air pollution and GHG emissions;
- Conserve resource lands and open space; and,
- Facilitate implementation of the San Diego River Park Master Plan.

10.2 Rationale for Alternative Selection

The CEQA Guidelines §15126.6(f)(1) provides several factors that may be considered with regard to the feasibility of an alternative: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated). As discussed in Chapter 5.0, implementation of the proposed FPA would result in significant and unavoidable impacts to the following: land use (related to noise), transportation/circulation, air quality, noise (operational), and historical resources (built environment). In addition, the proposed FPA would result in potentially significant but mitigable impacts to the following: noise (construction), biological resources, hydrology, historical resources (archaeological), ~~paleontological resources,~~ and health and safety. The alternatives identified in this section are intended to reduce or avoid one or more significant environmental effects of the proposed FPA. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis.

In developing the alternatives to be addressed in this chapter, consideration was given to each alternative's ability to meet the basic objectives of the proposed FPA and to eliminate or reduce potentially significant environmental impacts. The alternatives evaluated include the following: No Project Alternative (Adopted Community Plan), Reduced Density (<43 du/acre) Alternative, and Reduced Density (<73 du/acre) Alternative. An Alternative Site Location was also ~~evaluated~~, considered and rejected but was determined to be in feasible. These alternatives allow informed decision making and public participation because there is enough variation among the alternatives to provide a reasonable range.

Table 10-1
Comparison of the Proposed FPA and Project Alternatives

Environmental Issue Area	Focused Plan Amendment (FPA)	No Project Alternative	Reduced Density (<43 du/acre) Alternative	Reduced Density (<73 du/acre) Alternative
Land Use	SU (Noise)	Greater than proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Transportation/Circulation	SU (Intersections and roadways)	Less than proposed FPA	Less than proposed FPA but still SU	Less than proposed FPA but still SU
Air Quality and Odor	SU (Long-term operational)	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Greenhouse Gases	LS	Greater than proposed FPA	Less than proposed FPA	Less than proposed FPA
Noise	SU (Operational)	Similar to proposed FPA	Less than proposed FPA but still SU	Less than proposed FPA but still SU
Biological Resources	SM	Less than proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Hydrology	SM	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Water Quality	SM	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Historical Resources	SM	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Visual Effects and Neighborhood Character	LS	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Geologic Conditions	SM	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
~~Paleontological Resources~~	~~SM~~	~~Similar to proposed FPA~~	~~Similar to proposed FPA~~	~~Similar to proposed FPA~~
Health and Safety	SM	Similar to proposed FPA	Similar to proposed FPA	Similar to proposed FPA
Public Services and Facilities	LS	Less than proposed FPA	Less than proposed FPA	Less than proposed FPA
Public Utilities	LS	Greater than proposed FPA	Less than proposed FPA	Less than proposed FPA

LS = less than significant; **SM** = significant and mitigated; **SU** = significant and unavoidable

Note: For the proposed FPA, Agricultural Resources, Paleontological Resources, and Mineral Resources were determined not to be significant (see Chapter 9.0) and were therefore excluded from this matrix.

10.3 No Project Alternative (Adopted Community Plan)

The following discussion of the No Project Alternative (Adopted Community Plan) is based on the CEQA Guidelines Section 15126.6 (e) (3) (A), which states:

> When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operations into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.

Further, according to Section 15126.6(e)(3)(C):

> After defining the no project alternative . . . the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The No Project Alternative (Adopted Community Plan) would allow development to proceed in accordance with the existing adopted Navajo Community Plan (City of San Diego,1982). The adopted plan has eleven elements that establish specific land use, transportation, and environmental quality policies and proposals, together with an evaluation of the social and economic impacts resulting from those proposals. Recommendations are included in each element to provide the framework for development.

The specific elements of the adopted Navajo Community Plan are:

1. Residential
2. Commercial
3. Industrial
4. Mixed-use
5. San Diego River Park Subdistrict
6. Open Space Retention and Utilization
7. Parks and Recreation
8. Public Schools
9. Other Community Facilities
10. Circulation
11. Community Environment

10.3.1 Land Use

The No Project Alternative (Adopted Community Plan) would retain the 1982 Navajo Community Plan that currently exists. The Navajo Community Plan was originally established as a "program for providing health, safety, and welfare to the existing and future residents and maintain the area as a desirable neighborhood to live in" (City of San Diego, 1982).

The No Project Alternative (Adopted Community Plan) would not implement the City of Villages concept of the General Plan and Strategic Framework Element to the same extent as the proposed FPA. Specifically, the No Project Alternative would not include a rezone and CPIOZ in Grantville to provide design standards

to ensure high-quality development which supports walkability, strengthens connectivity and enhances community identity. Thus, because the No Project Alternative (Adopted Community Plan) would conflict with adopted land use plans, policies, or ordinances, it would not provide the same level of land use benefits as the proposed FPA. In addition, under this alternative, incompatible land uses would continue to be allowed under current zoning, and new incompatibilities would be more likely to result over time. In addition, under this alternative, the additional potential 109 dwelling units per acre would not be permitted and consequently it would result in less intensity of uses. As such, land use impacts under the No Project Alternative (Adopted Community Plan) would be greater than the proposed FPA.

10.3.2 Transportation/Circulation

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

10.3.3 Air Quality and Odor

The existing Community Plan includes objectives to promote higher densities and improve local air quality. The existing plan contains the General Plan policy framework to address this issue. Air quality effects for the entire City of San Diego were addressed in the General Plan Update, which acknowledged SANDAG's Regional Transportation Plan and the Regional Comprehensive Plan. The existing plan would result in limited Air Quality reductions based on the current less intensive zoning, but these reductions are minimal. Therefore, Air Quality impacts would be similar under the No Project Alternative (Adopted Community Plan) compared to the proposed FPA.

10.3.4 Greenhouse Gases

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

vehicles and energy resulting in a reduction in community-wide GHG emissions relative to BAU. Therefore, GHG impacts would be greater under the No Project Alternative (Adopted Community Plan) compared to the proposed FPA.

10.3.5 Noise

Under this alternative, noise sources, such as transportation and construction noise, would continue to exist. Similar to the proposed FPA, future construction activities related to the existing plan would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. Compliance with the City's standards and codes, along with other federal, state, and local regulations, is required of all projects. The Noise Element of the proposed FPA provides goals and policies to ensure location of compatible land uses and includes noise abatement measures for existing and new uses to protect people living and working in the project area from an excessive noise environment. Since the existing land use plan and zoning do not provide measures to the extent that would be provided by the proposed FPA and may not provide the same level of benefit to the community, future projects subject to discretionary review would need to demonstrate conformance with existing noise regulations, plans, and policies. Therefore, noise impacts under the No Project Alternative (Adopted Community Plan) would be similar the proposed FPA.

10.3.6 Biological Resources

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

10.3.7 Hydrology

Future development projects associated with the implementation of the proposed FPA area would result in a beneficial impact to hydrology and no significant adverse impacts have been identified. The total site discharge would be reduced by decreasing the amount of impervious surfaces from that of the existing condition. Additionally, existing and proposed flows would be routed to on-site detention basins or bioretention facilities, which increase the time of concentration providing smaller intensities of flow. Adverse impacts to hydrology and water quality under the No Project Alternative (Adopted Community Plan) would be more significant than those from the proposed FPA. Current drainage patterns in the project area would remain with the No Project (Adopted Community Plan) and future development under the No Project Alternative (Adopted Community Plan) would occur in areas that are fully developed and largely impervious due to existing structures, paving, and other improvements; therefore, the volume or rate of runoff would remain as existing.

Consistent with the existing topography, the existing storm water conveyance system discharges into the ocean. All future projects would be subject to discretionary review on a project-by-project basis, and all

development proposals in the City are subject to SDMC drainage regulations. Treatment and capacity requirements to address larger storm events that exceed current capacity would be addressed at the time projects are proposed. Improvements, which could include upgrades to the existing conveyance system, would be identified to address deficiencies if needed. Implementation of storm water control measures would provide incremental benefits by filtering and reducing runoff volume from new development compared to the existing condition.

Continued development consistent with the No Project Alternative (Adopted Community Plan) would not be expected to significantly increase the volume of direct runoff to drainage basins, municipal storm water systems, or ultimately to receiving surface and ground water bodies, or change the existing hydrology within the proposed FPA area. As with the proposed FPA, new development proposed as part of the No Project Alternative (Adopted Community Plan) would be required to implement LID BMPs as discussed in the City's Storm Water Standards Manual. Implementation of storm water BMPs would reduce the amount of pollutants transported from the project area to receiving waters during smaller storm events. Therefore, hydrology impacts of the No Project Alternative (Adopted Community Plan) would be similar to the proposed FPA.

10.3.8 Water Quality

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

10.3.9 Historical Resources

The existing Community Plan contains policies directed to protecting and conserving historical resources. While both the No Project Alternative (Adopted Community Plan) and the proposed FPA do not specifically propose demolition or substantial alteration of a resource or ground disturbing activities such as grading or excavation, it can be assumed that future development has the potential to result in significant direct and/or indirect impacts to cultural or historical resources. As the project area would be the same for both the proposed FPA and the No Project Alternative, impacts to historical resources would be similar for the proposed FPA and the No Project Alternative.

10.3.10 Visual Effects and Neighborhood Character

The Navajo Community Plan contains a framework to retain the character of Grantville. However, the existing plan does not contain specific polices to address visual quality or neighborhood character. The Navajo Community Plan directly addresses these issues in accordance with the framework established in the Urban Design Element of the General Plan. Implementation of the proposed land use amendments would pose less than significant impacts upon visual resources and neighborhood character. As redevelopment activities proceed within the FPA area, each individual development proposal shall be reviewed by the City to comply with the development standards of the City of San Diego Land

Development Code and the adopted design guidelines of the City of San Diego General Plan – Urban Design Element, Navajo Community Plan, and San Diego River Park Master Plan. Therefore, similar to the proposed FPA, the No Project Alternative (Adopted Community Plan) would not result in visual effect and neighborhood character impact.

10.3.11 Geologic Conditions

The project area contains geologic conditions, as described in Section 5.11, which could pose significant risks if the future development in the project area is not properly designed and constructed. However, potential impacts related to geology and soils would be avoided or reduced to less than significant through adherence to standard building code measures, including compliance with applicable building codes (e.g., Title 24 of the California Code of Regulations), the CBC, and the SDMC (effective August 30, 2012). Additionally, if required, a comprehensive, site-specific soil and geologic evaluation would be required for future projects to determine potential site specific hazards and site conditions. Erosion impacts associated with future development would be similar for the No Project Alternative (Adopted Community Plan) and the proposed FPA. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Adherence to the requirements of the City's Stormwater Standards Manual during construction would also be expected to improve post-construction conditions related to erosion, as new development would be required to adhere to a higher standard of BMPs compared to existing design standards.

Furthermore, General Plan Polices PF-Q.1 and PF-Q.2 promote the implementation of seismically safe development requirements for fault zones, the design of publicly accessible open space in areas of active faults where development cannot take place, and interagency coordination for tsunami events. Development under this alternative would be subject to the policies of the General Plan. Therefore, impacts under the No Project Alternative (Adopted Community Plan) would be similar to the proposed FPA.

10.3.12 Paleontological Resources

~~The proposed FPA and the adopted community plan both forecast development over the same area, and implementation of each has the potential to result in significant impacts to paleontological resources (see Section 5.12). The project area is underlain by geologic formations characterized as highly sensitive with regard to the potential presence of paleontological resources. Any future development projects allowed under the Proposed FPA which propose grading of 1,000 cubic yards or more and would extend to a depth of 10 feet or greater within areas of high paleontological sensitivity have the potential to result in significant impacts to paleontological resources. Because the No Project Alternative [Adopted Community Plan]) does not change the criteria for discretionary projects, additional CEQA review would continue to be required as specific projects are proposed.~~

~~Therefore, at the time individual development projects are proposed, potential impacts to paleontological resources would be reduced below a level of significance through project specific mitigation or standard measures to be implemented during construction to ensure the recovery of any resources.~~ The proposed FPA does include any high sensitivity geological formations per the City's Paleontological Guidelines and

no paleontological resources are anticipated. Impacts under the No Project Alternative (Adopted Community Plan) and the proposed FPA would be similar.

10.3.13 Health and Safety

Future development consistent with the No Project Alternative (Adopted Community Plan), as with the proposed FPA, may result in significant impacts if such development allows greater contact between humans and hazards or retains industrial/heavy commercial uses adjacent to more sensitive uses. In either case, potential significant impacts would occur with construction where soil and/or groundwater have been impacted by releases of hazardous materials or petroleum products from surficial spills, subsurface releases from USTs, or other sources. As such, significant hazardous materials impacts would be similarly mitigated for new development through compliance with all applicable federal, state, and local laws and regulations regarding hazardous materials siting, assessment, and remediation. In addition, a risk assessment would be required at all sites within the project area where contamination has been identified or is discovered during future construction activities, and a hazardous building materials survey would be conducted at all buildings in the project area prior to demolition or renovation activities.

10.3.14 Public Services and Facilities

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

10.3.15 Public Utilities

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

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

10.3.16 Summary of No Project Alternative (Adopted Community Plan)

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

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

This alternative does not meet the following project objectives:

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

10.4 Alternative 1 - Reduced Density (<43 du/acre) Alternative

Alternative 1 – Reduced Density (<43 du/acre) Alternative would reduce the density and intensity of development compared to the proposed FPA by more than 60 percent. The distribution of land use would otherwise be consistent with the proposed FPA. This alternative would reduce project impacts associated with the intensity of use, and any corresponding significant impacts that would result.

10.4.1 Land Use

Similar to the proposed FPA, Alternative 1 would include an amendment to the Navajo Community Plan. Therefore, Alternative 1 would amend the zoning types, in accordance with the proposed FPA, but would call for a maximum of 43 du/acre. Implementation of this alternative would provide 5,237 units, reducing the total number of proposed residential units in the FPA by approximately 37 percent (3,038 units). Fewer residential units would also reduce the number and size of new dwelling units available in the community. The following table describes acreages per zone proposed for Alternative 1. The zoning of Alternative 1 would be similar to the zoning described in the proposed FPA; however, the community commercial zoning would be reduced to just CC-2-5 and CC-3-6, eliminating the CC-3-8, CC-3-9 that would be allowed by the proposed FPA. Figures 10-1 and 10-2 depict the proposed zoning and land use, respectively, for Alternative 1. Table 10-2 lists the acreage of the zoning for Alternative 1.

Table 10-2
Acreage of Existing and Proposed Alternative 1 – Reduced Density Alternative Zones (<43 du/acre)

Category	Zone	Acres (Existing)	Acres (Proposed with Reduced Density Alt 1)
Agricultural-Residential	AR-1-1	3.82	0
Community Commercial	CC-1-3	5.59	0
	CC-2-5	0	36.63
	CC-3-6	0	145.90
	CC-3-8	0	0
	CC-4-2	10.85	0
Commercial-Visitor	CV-1-1	3.13	0
Industrial-Light	IL-2-1	10.59	0
	IL-3-1	184.36	0
Open Space-Floodplain	OF-1-1	7.27	9.82
Residential-Multiple Unit	RM-3-7	0	34.26
TOTAL		**226.61**	**226.61**

Source: City of San Diego, 2014; BRG Consulting, 2014.

Although Alternative 1 would result in less density compared to the proposed FPA, impacts to Land Use under this alternative would be similar to the proposed FPA, as the location of land uses would be largely similar.

10.4.2 Transportation/Circulation

Similar to the FPA, the goals and recommendations of the Mobility Element would be applied to Alternative 1 in order to reduce impacts. With a reduction in residential units, under current zoning, trip generation (Average Daily Trips [ADT] volume) would be reduced by approximately 60.8 percent compared to the proposed FPA, and parking demand would be reduced slightly. However, it is anticipated that traffic conditions would remain significant and unavoidable with the implementation of Alternative. Impacts to road segments and intersections would be incrementally reduced compared to the proposed FPA since fewer residents and service vehicles would be traveling on local and regional roadways in the area. With

implementation of some or all of the roadway and freeway improvements discussed in Section 5.2 of this PEIR, impacts could be reduced, but not to a level of less than significant.

It can be assumed that the same or similar targeted street improvements, traffic signals, restriping, transportation systems management techniques, and traffic calming measures would be implemented to increase street capacity, reduce congestion, reduce speeding, and improve neighborhood livability. Additionally, continued adherence to the General Plan and the SANDAG Regional Transportation Plan would be required under this alternative. Implementation of the mixed use and transit-oriented development principles provided in the proposed land use plan and CPIOZ would be anticipated to reduce the number of vehicle trips and vehicle miles travelled within the project area. As such, traffic/circulation impacts under Alternative 1 would be slightly decreased when compared to those anticipated under the proposed FPA; however, it is anticipated that the impacts would remain significant and unavoidable.

10.4.3 Air Quality and Odor

Alternative 1 would be consistent with the growth assumptions used in development of the local air quality plans and the General Plan and, therefore, would see a reduction of air quality impacts over the existing plan. Due to the reduction in density for this alternative compared to the proposed FPA, air quality impacts would be slightly reduced; however, it is unlikely that the air quality impacts would be reduced to a level less than significant. Therefore, similar to the proposed FPA, a significant and unavoidable air quality impact is identified for this alternative.

10.4.4 Greenhouse Gases

GHG impacts would be slightly reduced under Alternative 1 compared to those of the proposed FPA due to the reduction in residential units. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. As such, it can be assumed that vehicle emissions would decrease correspondingly. As with the proposed FPA, additional vehicle emissions reductions for this alternative would also be expected over time due to regulations on automobile and fuel manufacturers that would reduce vehicle emissions by 2020.

In addition, this alternative would be required to comply with the Title 24 California Building Code that contains increased energy and water efficiency requirements that would reduce GHG emissions from those sources. Implementation of this alternative would also benefit from the additional GHG-reducing features identified for the proposed FPA. Other policies from the proposed FPA that encourage highly efficient energy and water conservation design; increase walkability and bicycle and transit accessibility; increase urban forestry practices and community gardens; decrease urban heat islands; and increase climate sensitive community design would still apply. These policies would serve to reduce consumption of fossil fueled vehicles and energy resulting in a reduction in communitywide GHG emissions relative to the existing conditions. The implementation of Alternative 1 would result in slightly reduced GHG impacts compared to the proposed FPA.



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

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Proposed Rezoning - Alternative 1

FIGURE
10-1



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014

November 2014

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PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Proposed Land Use - Alternative 1

FIGURE
10-2

10.4.5 Noise

Noise impacts under Alternative 1 would be incrementally reduced compared to the proposed FPA due to construction of fewer residential units and commercial uses, with an associated reduction in traffic. Under this alternative, noise impacts would continue to exist. Similar to the proposed FPA, future construction activities related to the existing plan would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. Compliance with the City's standards and codes, along with other federal, state, and local regulations, is required of all projects.

Alternative 1 would also implement the goals and policies from the Navajo Community Plan to ensure noise abatement measures for existing and new uses to protect people living and working in the project area from an excessive noise environment. Therefore, due to the decreased intensity in land uses, noise impacts under the Alternative 1 would be slightly decreased when compared to the proposed FPA. However, similar to the proposed FPA a significant and unavoidable operational noise impact associated with increased traffic would result with the implementation of this Alternative.

10.4.6 Biological Resources

Alternative 1 would impact the same area as the proposed FPA, which could potentially lead to impacts to biological resources. The proposed rezone would primarily occur in areas of the Grantville community that are currently developed and lack biological resources. As with implementation of the proposed FPA, Alternative 1 would be required to comply with the MSCP, which provides comprehensive long-term habitat conservation to address the needs of multiple species and the preservation of natural vegetation communities for lands within the City and sphere of influence boundaries. All future projects developed under the proposed FPA as well as Alternative 1 and other alternatives would be required to adhere to regulations imposed by state and federal resource agencies which provide additional assurances that impacts to biological resources would not be significant. Impacts related to biological resources under Alternative 1 would be similar to those identified for the proposed FPA.

10.4.7 Hydrology

Current drainage patterns on the project site would be improved with Alternative 1. As with the proposed FPA, future development under Alternative 1 would occur in areas that are fully developed and largely impervious due to existing structures, paving, and other improvements; therefore, due to the increase in pervious surfaces, the volume or rate of runoff to drainage basins, municipal storm water systems, or ultimately to receiving waters would be an improvement. Additionally, all development in the City is subject to drainage regulations through the City Municipal Code. As with the proposed FPA, new development proposed as part of Alternative 1 would be required to implement LID BMPs as discussed in the City's Storm Water Standards Manual. As new projects are brought forward, mandatory storm water regulations would be required to control or reduce the rate and volume of runoff from redeveloped sites, thereby resulting in an incremental reduction in runoff and drainage impacts for smaller storm events over time as compared to the existing condition. Runoff for larger storms (25-, 50-, 100-, and 500-year storms) would be similar to the existing conditions. Regardless, implementation would not result in significant changes to the existing hydrology or drainage compared to the existing conditions. As such, impacts related to hydrology under Alternative 1 would be similar to those identified for the proposed FPA.

10.4.8 Water Quality

Similar to the proposed FPA, the implementation of Alternative 1 is not expected to have a significant impact on water quality. The existing project area is highly urbanized, and future development that maintains or incrementally reduces the intensity of land use on existing disturbed or developed parcels would not be expected to significantly degrade water quality of receiving surface and ground water bodies. Furthermore, regardless of the alternative selected, new development projects would be required to comply with existing water quality regulations and design requirements, resulting in an incremental improvement to water quality over time. Future development projects within the proposed FPA area would be required to adhere to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; implementation of construction and post-construction BMPs; and, compliance with California BMP Handbook. Therefore, similar to the proposed FPA, implementation of Alternative 1 would result in less than significant water quality impacts.

10.4.9 Historical Resources

As with the proposed FPA, implementation of this alternative would be required to adhere to all applicable City, federal, state, and local regulations regarding the protection of historical resources, as described in Section 5.9. Where preservation of the historically significant components related to historic buildings and structures can be maintained through compliance with regulations and/or mitigation, impacts would be reduced to below a level of significance. As the project area would be the same for both the proposed FPA and Alternative 1, both would have similar potential to impact historical resources.

10.4.10 Visual Effects and Neighborhood Character

The goals and recommendations included in the proposed FPA, which specifies design recommendations and guidelines intended to retain Grantville's community character would also be applied to Alternative 1. The implementation of the proposed rezone of Alternative 1 would not have a negative impact on visual quality and neighborhood character and therefore, impacts under Alternative 1 would be similar to the proposed FPA.

10.4.11 Geologic Conditions

Impacts under Alternative 1 would be similar to those of the proposed FPA. Implementation of Alternative 1 has the potential to result in significant impacts related to geology and soils. The project area contains geologic conditions, which could pose significant risks if the future project area is not properly designed and constructed (see Section 5.11). However, potential impacts related to geology and soils would be avoided or reduced to less than significant through adherence to standard building code measures, including compliance with applicable building codes (e.g., Title 24 and the UBC) and the SDMC. Additionally, a comprehensive, site specific soil and geologic evaluation could be required for all future projects to determine potential hazards and site conditions. Site-specific measures would be incorporated as recommended by the project engineer at the time specific plans are proposed. Therefore, similar to the proposed FPA, no impacts associated with geological hazards would occur with the implementation of Alternative 1.

In addition, any future development projects would be required to comply with the SDMC, NPDES General Construction Storm Water Permit and the MS4 Stormwater Permit, and would be required to prepare and implement a SWPPP and BMPs.

10.4.12 Paleontological Resources

~~As with the proposed FPA, significant impacts to sensitive paleontological resources with the implementation of Alternative 1 would be reduced to less than significant. The proposed FPA and Alternative 1 both forecast development over the same area, and implementation of each has the potential to result in significant impacts to paleontological resources (see Section 5.12). Because of the project area's high sensitivity for paleontological resources, grading into this formation could potentially destroy fossil remains. Consequently, the implementation of Mitigation Measure PR-1 as identified in Section 5.12 of this PEIR would reduce impacts to paleontological resources to a level less than significant.~~ The proposed FPA does include any high sensitivity geological formations per the City's Paleontological Guidelines and no paleontological resources are anticipated. Impacts under the No Project Alternative (Adopted Community Plan) and the proposed FPA would be similar.

10.4.13 Health and Safety

Health and safety impacts under Alternative 1 would be similar to the proposed FPA, as both would be developed within the same area. The project area contains properties of environmental concern; however, future development proposals for these areas would be screened and applicants would be required to obtain a clearance from the County's DEH as discussed in PEIR Section 5.13. Similar to the proposed FPA, these compliance measures would reduce the potential for hazardous materials to affect the public or environment with the implementation of Alternative 1.

10.4.14 Public Services and Facilities

Fewer residential units proposed under Alternative 1 would reduce the total needs for parks, libraries, schools, and fire/police protection as compared to the proposed FPA. However, the decrease in demand under this alternative, as compared to the proposed FPA, would be negligible because the need for these services would be similar. Impacts to public services would be reduced but be similar under the Alternative 1 compared to the proposed FPA.

10.4.15 Public Utilities

Reductions in the overall number of residential units, as a result of the implementation of Alternative 1, could reduce the capacity requirements for some existing public utilities in the area compared to the proposed FPA thereby requiring fewer or smaller-scale improvements. As with the proposed FPA, the goals and recommendations of the Public Facilities, Services and Safety Element and General Plan would be applied to Alternative 1 in order to reduce impacts resulting from the need to construct additional public facilities.

The updated PFFP addresses water, wastewater, energy, and storm water, and includes specific recommendations that discuss solid waste and energy. The General Plan Conservation Element discusses water resources management and the Public Facilities and Service Element evaluates growth and its affects upon infrastructure. Utility upgrades may be required as growth occurs and similar to the proposed

FPA, Alternative 1 would adopt the updated PFFP to address the current and future needs of the community.

Therefore the need for additional sewer, water, energy and solid waste systems under Alternative 1 would slightly decrease due to reduced density, compared to the proposed FPA.

10.4.16 Summary of Alternative 1 – Reduced Density (<43 du/acre) Alternative

As discussed above, Alternative 1 would not result in additional significant impacts beyond those previously disclosed for the proposed FPA. Impacts associated with land use (noise), transportation/circulation, air quality, and noise (operational), would be incrementally less with the reduction in overall density of development, but would not be reduced to below a level of significance and impacts would remain significant and unavoidable. Impacts for all other issue areas would be similar compared to the proposed FPA. However, Alternative 1 would not meet all of the proposed FPA's objectives. Furthermore fewer residential units would also reduce the number of new dwelling units available in the community. The City of San Diego's Regional Housing Needs Allocation calls for the City to develop 88,096 housing units by the year 2020. Alternative 1 would reduce potential housing development in the proposed FPA area by 37%, forcing the city to find other areas to accommodate more housing.

10.5 Alternative 2 - Reduced Density (<73 du/acre) Alternative

The Alternative 2 – Reduced Density (<73 du/acre) Alternative would reduce the density and intensity of development compared to the proposed FPA by more than 30 percent. The distribution of land uses would otherwise be consistent with the proposed FPA. This alternative would slightly reduce project impacts associated with the intensity of uses, and any corresponding significant impacts that would result.

10.5.1 Land Use

Similar to the proposed FPA, Alternative 2 would include the amendment to the Navajo Community Plan. Therefore, Alternative 2 would amend the zoning types, in accordance with the proposed FPA, but would call for a maximum of 73 du/acre and would otherwise, be consistent with the existing Navajo Community Plan. This scale of reduction would likely result in fewer multi-family residential units, as well as less intense commercial and industrial development. Impacts to land use under this alternative would not be consistent with the increased density goals proposed in the FPA and the land use impacts to development goals would be greater than the proposed Navajo Community Plan. Implementation of this alternative would provide 7,356 units, reducing the total number of proposed residential units by approximately 919 units, or approximately 11 percent fewer units. The following table describes the acreages per zone for Alternative 2. The zoning of Alternative 2 would be similar to the zoning described in the proposed FPA; however, more types of community commercial zoning (CC-2-5, CC-3-6, CC-3-8, CC-3-9) would be implemented with the proposed FPA, while only CC-2-5, CC-3-6, and CC-3-8 would be implemented with Alternative 2. Figures 10-3 and 10-4 depict the proposed zoning and land use, respectively, for Alternative 2. Table 10-3 lists the acreage for Alternative 2.



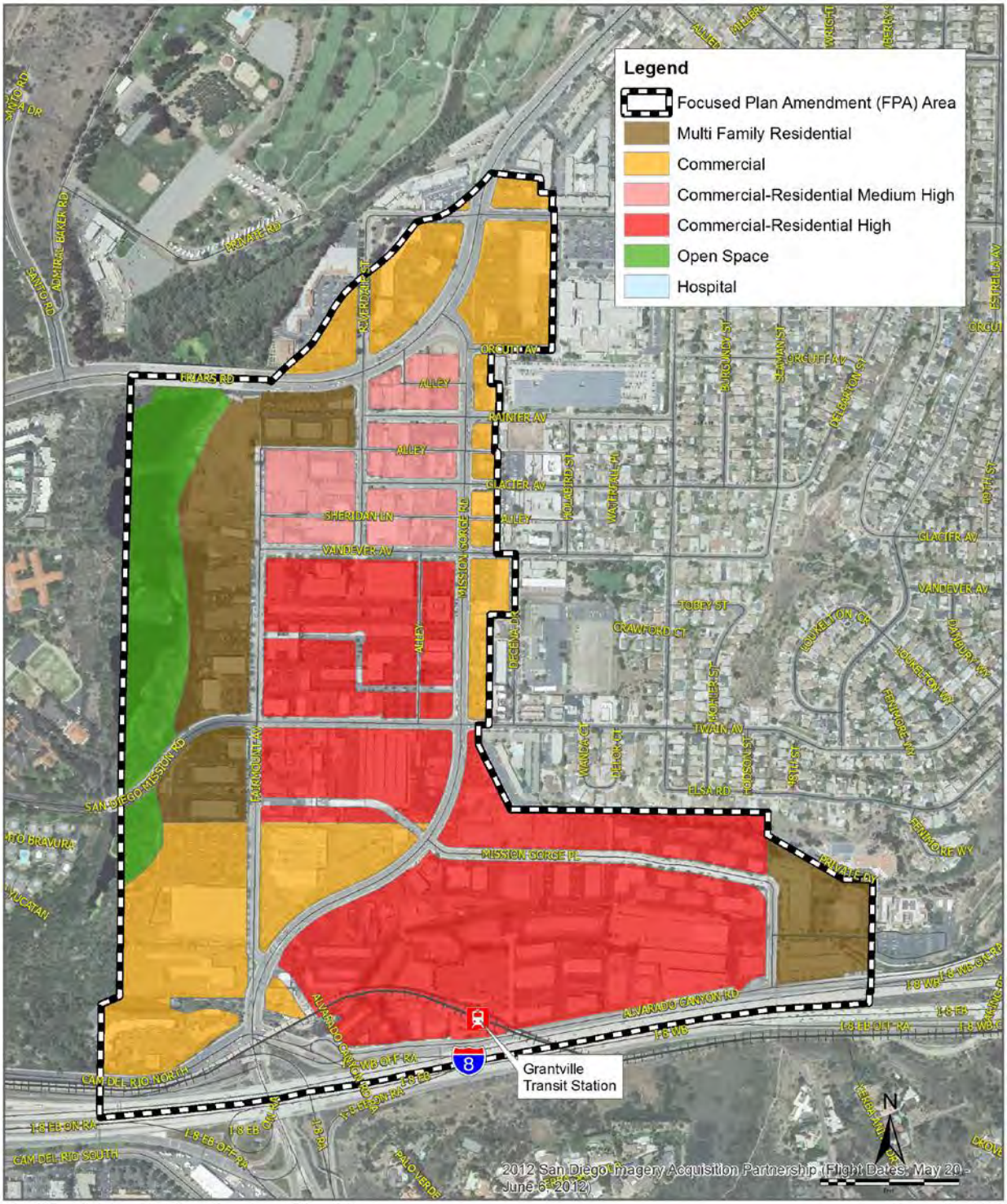
SOURCE: 2014, SanGIS, 2014; City of San Diego, 2014 November 2014

CITY OF SAN DIEGO PLANNING DEPARTMENT

Grantville Focused Planned Amendment

Proposed Rezoning - Alternative 2

FIGURE 10-3



SOURCE: 2014, SanGIS, 2014; City of San Diego,2014 November 2014

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Proposed Land Use - Alternative 2

FIGURE
10-4

Table 10-3
Acreage of Existing and Proposed Alternative 2 – Reduced Density Alternative Zones (<73 du/acre)

Category	Zone	Acres (Existing)	Acres (Proposed with Reduced Density Alt 2)
Agricultural-Residential	AR-1-1	3.82	0
Community Commercial	CC-1-3	5.59	0
	CC-2-5	0	36.63
	CC-3-6	0	28.77
	CC-3-8	0	117.13
	CC-4-2	10.85	0
Commercial-Visitor	CV-1-1	3.13	0
Industrial-Light	IL-2-1	10.59	0
	IL-3-1	184.36	0
Open Space-Floodplain	OF-1-1	7.27	9.82
Residential-Multiple Unit	RM-3-7	0	34.26
TOTAL		**216.50**	**238.27**

Source: City of San Diego, 2014; BRG Consulting, 2014.

Although Alternative 2 would result in less density compared to the proposed FPA, impacts to Land Use under this alternative would be similar to the proposed FPA.

10.5.2 Transportation/Circulation

Similar to the proposed FPA, the goals and recommendations of the Mobility Element would be applied to Alternative 2 in order to reduce impacts. As alternative 2 proposes residential units, trip generation (ADT volume) would be reduced 19.7 percent compared to the proposed FPA, and parking demand would be reduced slightly. However, it is anticipated that traffic conditions would remain significant and unavoidable. Impacts to road segments and intersections would be incrementally reduced compared to the proposed FPA since fewer residents and service vehicles would be traveling local and regional roadways in the area. With implementation of some or all of the roadway and freeway improvements discussed in Section 5.2 of this PEIR impacts could be reduced, but not to a level of less than significant.

It can be assumed that the same or similar targeted street improvements, traffic signals, restriping, transportation systems management techniques, and traffic calming measures would be implemented to increase street capacity, reduce congestion, reduce speeding, and improve neighborhood livability. Additionally, continued adherence to the General Plan and the SANDAG Regional Transportation Plan would be required under this alternative. As such, traffic/circulation and parking impacts under Alternative 2 would be slightly decreased when compared to those anticipated under the proposed FPA.

10.5.3 Air Quality and Odor

Alternative 2 would be consistent with the growth assumptions used in development of the local air quality plans and the General Plan and would represent a reduction of air quality impacts over the existing plan. Due to the reduction in density for this alternative, air quality impacts would be slightly reduced compared to the proposed FPA; however, it is unlikely that the air quality impacts would be reduced to a level less

than significant. Therefore, similar to the proposed FPA, a significant and unavoidable air quality impact is identified for this alternative.

10.5.4 Greenhouse Gases

GHG impacts would be slightly reduced under Alternative 2 compared to those of the proposed FPA due to the reduction in residential units. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. As such, it can be assumed that vehicle emissions would decrease correspondingly. As with the proposed FPA, additional vehicle emissions reductions for this alternative would also be expected over time due to regulations on auto and fuel manufacturers that would reduce vehicle emissions by 2020.

In addition, this alternative would be required to comply with the Title 24 California Building Code that contains increased energy and water efficiency requirements that would reduce GHG emissions from those sources. Implementation of Alternative 2 would also benefit from the additional GHG-reducing features identified for the proposed FPA. Other policies within the elements that encourage highly efficient energy and water conservation design; increase walkability and bicycle and transit accessibility; increase urban forestry practices and community gardens; decrease urban heat islands; and increase climate sensitive community design would still apply. These policies would serve to reduce consumption of fossil fuels and energy resulting in a reduction in communitywide GHG emissions relative the existing conditions. Implementation of Alternative 2 would result in slightly reduced GHG impacts compared to the proposed FPA.

10.5.5 Noise

Noise impacts under Alternative 2 would be incrementally reduced compared to the proposed FPA due to construction of fewer residential units and commercial uses, and the associated reduction in residential traffic. Under this alternative, noise impacts would continue to exist. Similar to the proposed FPA, future construction activities related to the existing plan would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. Compliance with the City's standards and codes, along with other federal, state, and local regulations, is required of all projects.

The Navajo Community Plan provides goals and policies to ensure noise abatement measures for existing and new uses to protect people living and working in the project area from an excessive noise environment that Alternative 2 would also implement. Noise impacts under the Alternative 2 would be slightly decreased when compared to the proposed FPA as Alternative 2 would develop fewer residences; however, similar to the proposed FPA a significant and unavoidable operational noise impact would result with the implementation of this alternative.

10.5.6 Biological Resources

Alternative 2 would impact the same area as the proposed FPA, which could potentially lead to impacts to biological resources. The proposed FPA would primarily occur in areas of Grantville that are currently developed and lack biological resources. As with implementation of the proposed FPA, Alternative 2 would be required to comply with the MSCP, which provides comprehensive long-term habitat conservation to

address the needs of multiple species and the preservation of natural vegetation communities for lands within the City and sphere of influence boundaries. All future projects developed under the proposed FPA as well as Alternative 1 and other alternatives would be required to adhere to regulations imposed by state and federal resource agencies which provide additional assurances that impacts to biological resources would not be significant. Impacts related to biological resources under Alternative 2 would be similar to those identified for the proposed FPA.

10.5.7 Hydrology

Current drainage patterns on the project site would be improved with Alternative 2. As with the proposed FPA, future development under Alternative 2 would occur in areas that are fully developed and largely impervious due to existing structures, paving, and other improvements; therefore, due to the increase in pervious surfaces, the volume or rate of runoff to drainage basins, municipal storm water systems, or ultimately to receiving waters would be an improvement. Additionally, all development in the City is subject to drainage regulations through the City Municipal Code. As with the proposed FPA, new development proposed as part of Alternative 2 would be required to implement LID BMPs as discussed in the City's Storm Water Standards Manual. As new projects are brought forward, mandatory storm water regulations would be required to control or reduce the rate and volume of runoff from redeveloped sites, thereby resulting in an incremental reduction in runoff and drainage impacts for smaller storm events over time compared to the existing condition. Runoff for larger storms (25-, 50-, 100-, and 500-year storms) would be similar to the existing conditions. Regardless, implementation would not result in significant changes to the existing hydrology or drainage compared to the existing conditions. As such, impacts related to hydrology under Alternative 2 would be similar to those identified for the proposed FPA.

10.5.8 Water Quality

Similar to the proposed FPA, the implementation of Alternative 2 is not expected to have a significant impact on water quality. The existing project area is highly urbanized, and future development that maintains or incrementally reduces the intensity of land use on existing disturbed or developed parcels would not be expected to significantly degrade water quality of receiving surface and ground water bodies. Furthermore, regardless of the alternative selected, new development projects would be required to comply with existing water quality regulations and design requirements, resulting in an incremental improvement to water quality over time. Future development projects within the proposed FPA area would be required to adhere to the requirements of the RWQCB and SDMC, including the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; implementation of construction and post-construction BMPs; and, compliance with California BMP Handbook. Therefore, similar to the proposed FPA, implementation of Alternative 2 would result in less than significant water quality impacts.

10.5.9 Historical Resources

As with the proposed FPA, implementation of this alternative would be required to adhere to all applicable City, federal, state, and local regulations regarding the protection of historical resources, as described in Section 5.9. Where preservation of the historically significant components related to historic buildings and structures can be maintained through compliance with regulations and/or mitigation as discussed in

Section 5.9 of this PEIR, impacts would be reduced to below a level of significance. As the project area is the same for both the proposed FPA and Alternative 2, both would have similar potential to impact historical resources.

10.5.10 Visual Effects and Neighborhood Character

The goals and recommendations included in the proposed FPA, which specify design recommendations and guidelines intended to retain Grantville's community character would also be applied to Alternative 2. The implementation of the proposed rezone of Alternative 2 would not have a negative impact on visual effects and neighborhood character and therefore, impacts under Alternative 2 would be similar to the proposed FPA.

10.5.11 Geologic Conditions

Impacts under Alternative 2 would be similar to those of the proposed FPA. Implementation of Alternative 2 has the potential to result in significant impacts related to geology and soils. The project area contains geologic conditions, which could pose significant risks if the future project area is not properly designed and constructed (see Section 5.11). However, potential impacts related to geology and soils would be avoided or reduced to less than significant through adherence to standard building code measures, including compliance with applicable building codes (e.g., Title 24 and the UBC) and SDMC. Additionally, a comprehensive, site specific soil and geologic evaluation could be required for all future projects to determine potential hazards and site conditions. Site-specific measures would be incorporated as recommended by the project engineer at the time specific plans are proposed.

In addition, any future development projects would be subject to comply with the SDMC, NPDES General Construction Storm Water Permit, and MS4 Stormwater Permit, and would be required to prepare and implement a SWPPP and BMPs. Therefore, similar to the proposed FPA no impacts associated with the erosion of soils would occur with the implementation of Alternative 2.

10.5.12 Paleontological Resources

~~As for the proposed FPA, significant impacts to sensitive paleontological resources with the implementation of Alternative 2 would be reduced to less than significant. The proposed FPA and Alternative 2 both forecast development over the same area, and implementation of each has the potential to result in significant impacts to paleontological resources (see Section 5.12). Because of the project area's high sensitivity for paleontological resources, grading into this formation could potentially destroy fossil remains. Consequently, the implementation of Mitigation Measure PR-1 as identified in Section 5.12 of this PEIR would reduce impacts to paleontological resources to a level less than significant.~~ The proposed FPA does include any high sensitivity geological formations per the City's Paleontological Guidelines and no paleontological resources are anticipated. Impacts under the No Project Alternative (Adopted Community Plan) and the proposed FPA would be similar.

10.5.13 Health and Safety

Health and safety impacts under Alternative 2 would be similar to the proposed FPA, as both wouild be developed within the same area. The project area contains properties of environmental concern; however, future development proposals would be screened and applicants would be required to obtain a clearance from the County's DEH as discussed in PEIR Section 5.13. Similar to the proposed FPA, these compliance measures would reduce the potential for hazardous materials to affect the public or environment with the implementation of Alternative 2.

10.5.14 Public Services and Facilities

Fewer residential units proposed under Alternative 2 would reduce the total needs for parks, libraries, schools, and fire/police protection. However, the decreased demand under this alternative, as compared to the proposed FPA, would be negligible because the need for these services would be similar. Impacts to public services would be reduced but similar under the Alternative 2 compared to the proposed FPA.

10.5.15 Public Utilities

Reductions in the overall number of residential units, as a result of the implementation of Alternative 2, could reduce the capacity requirements for some existing public utilities in the area compared to the proposed FPA thereby requiring fewer or smaller-scale improvements. As with the proposed FPA the goals and recommendations of the Public Facilities, Services and Safety Element from the FPA and General Plan would be applied to Alternative 2 in order to reduce impacts resulting from the need to construct additional facilities.

The updated PFFP addresses water, wastewater, energy, storm water, and specific recommendations that discuss solid waste. The General Plan Conservation Element discusses water resources management and the Public Facilities and Service Element evaluates growth and its affects upon infrastructure. Utility upgrades may be required as growth occurs and similar to the proposed FPA, Alternative 2 would adopt the updated PFFP to address the current and future needs of the community.

Therefore, the need for additional sewer, water, energy and solid waste systems under Alternative 2 would slightly decrease due to reduced density, as compared to the proposed FPA.

10.5.16 Summary of Alternative 2 – Reduced Density (<73 du/acre) Alternative

As discussed above, Alternative 2 would not result in additional significant impacts beyond those previously disclosed for the proposed FPA. Impacts associated with land use (noise), transportation/circulation, air quality, and noise (operational), would be incrementally less with the reduction in overall density of development, but would not be reduced to below a level of significance and impacts would remain significant and unavoidable. Impacts for all other issue areas would be similar compared to the proposed FPA. However, Alternative 2 would not meet all of the proposed FPA's objectives. Incrementally fewer residential units would reduce the number of new dwelling units available in the community. The City of San Diego's Regional Housing Needs Allocation calls for the City to develop 88,096 housing units by the year

2020. Alternative 2 would reduce potential housing development in the proposed FPA area by 11%, forcing the city to find other areas to accommodate more housing.

10.6 Alternatives Considered but Rejected

Additional alternatives to the proposed FPA were considered throughout the plan update process. The following alternative was considered but rejected because it did not meet the objectives of the project as explained for each scenario considered.

10.6.1 Alternative Site Location

The proposed FPA was developed through a series of design charrettes and several years of monthly stakeholder meetings in the Navajo community. Initially, the Grantville area, referred to as Subarea A, was one of several subareas within the Navajo community considered for a land use plan amendment. Subarea A is located surrounding the existing transit center, while the other subareas are located elsewhere within the Grantville Community and are farther away from the transit center. Therefore, Subarea A was identified as the appropriate location for the proposed FPA. This Alternative Site Location scenario refers to preparing an FPA on one of the other Grantville subareas. This alternative is infeasible because it is not consistent with the following project objectives:

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

10.7 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify the "environmentally superior" alternative based on the evaluation of the Plan and its alternatives. However, pursuant to the CEQA Guidelines Section 15126.6 (e)(2), 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.

Alternative 1 - Reduced Density (<43 du/acre) Alternative is identified as the Environmentally Superior Alternative, as it would reduce the proposed FPA's density and intensity by more than 60 percent. Alternative 1 would reduce the number of residential units by 3,038 units, and the amount of commercial

use would be reduced by an estimated 41.01acres, compared to the proposed FPA. This reduction could result in smaller-scale, residential and commercial projects with less density. The reduced intensity under this alternative would also be expected to result in proportionate reductions in traffic and construction activity within the community by approximately 60.8 percent compared to the proposed FPA, thereby resulting in a reduction in impacts to community intersections, road segments, and parking supply. However, similar to the proposed FPA, transportation/circulation impacts under the Alternative 1 would still be significant and unavoidable. Compared to Alternative 2, Alternative 1 will result in a greater decrease in density and therefore a greater decrease in traffic generation within the Grantville community.

In addition, impacts associated with land use (noise), transportation/circulation, air quality, and noise (operational) would be incrementally less with the reduction in overall density of development but would not be reduced to below a level of significance and impacts would remain significant and unavoidable. Impacts for all other issue areas would be similar to the proposed FPA. While Alternative 1 would be the Environmentally Superior Alternative, Alternative 1 would not meet all of the proposed FPA's objectives, nor would it meet the goals of the City of San Diego General Plan.

The City of San Diego 2008 General Plan set goals for developing compact, mixed-use, walkable communities. The City is also attempting to meet its Regional Housing Needs Allocation, which calls for the city to construct a significant number of housing units by 2020. Grantville's location provides an opportunity to develop a high quality community that can meet those goals. While Alternative 1 may be environmentally superior, its reduction in overall density does not allow the City to maximize the potential development for the site. Only the proposed FPA would meet the City's General Plan goals and create a walkable community with access to the San Diego River, the Grantville Trolley Station, and other amenities in the area.

11.0 Mitigation Monitoring and Reporting Program

Grantville Focused Plan Amendment
PTS No. 346289

This Mitigation Monitoring and Reporting Program is designed to ensure compliance with Public Resources Code Section 21081.6 during implementation of mitigation measures. This program identifies at a minimum: the department responsible for the monitoring, what is to be monitored, how the monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements. A record of the Mitigation Monitoring and Reporting Program will be maintained at the offices of the Entitlement Division, 1222 First Avenue, Fifth Floor, San Diego, CA, 92101. All mitigation measures contained in the Environmental Impact Report (PTS No. 346289) shall be made conditions of the project as may be further described below.

The proposed FPA is described in this PEIR. The PEIR focused on issues determined to be potentially significant by the City. The issues addressed in the PEIR include land use, transportation/circulation, air quality and odor, greenhouse gas emissions, noise, biological resources, hydrology, water quality, historical resources, visual effects/neighborhood character, geologic conditions, paleontological resources, health and safety, public services and facilities, and public utilities.

Public Resources Code Section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for land use, transportation/circulation, air quality, noise, biological resources, hydrology, historical resources, paleontological resources, and health and safety.

The environmental analysis identified mitigation measures determined to be feasible and would reduce some or all of the potentially significant impacts to a less than significant level for the following issues: land use, transportation/circulation, noise (construction), biological resources, hydrology, historical resources (archaeological), geologic conditions, paleontological resources, and health and safety; however, impacts would not be fully reduced for some of these issue areas. Mitigation was determined infeasible for the following issue areas: land use (related to noise), transportation/circulation, air quality, and noise (operational). No feasible mitigation is available at the community plan level to reduce impacts resulting from implementation, although implementation of the proposed FPA is intended to reduce the use of fossil-fueled vehicles and consumption of energy through incorporation of transit-oriented development into the proposed FPA area.

11.1 Land Use

Environmental Plan Consistency

Impact

Future development projects associated with implementation of the proposed FPA have the potential to result in significant direct and indirect impacts to City MHPA lands.

Mitigation Framework

Future development project types that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulation for CPIOZ Type A and can demonstrate that there are no biological resources present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework LU-1 ~~through LU-3~~.

~~**Mitigation Measure LU-1:**~~

~~Future development project policies shall include a requirement to make use of project designs, engineering, and construction practices that avoid and minimize impacts to sensitive habitats and wildlife corridor/MHPA preserve areas.~~

~~**Mitigation Measure LU-2:**~~

~~Further environmental review shall be conducted in compliance with the most recent versions of all applicable local, state, and federal regulations where specific actions would result in impacts to sensitive habitats and/or wildlife corridor/MHPA preserve areas. These reviews shall be conducted at the earliest possible period of tiered project review to ensure the most flexibility in planning and project design, and resolve conflicts with significant biological resources.~~

Mitigation Measure LU-~~3~~1:

All future specific actions undertaken at or near the San Diego River or adjacent to the MHPA shall be reviewed for consistency with the MSCP preserve and development requirements, as well as the MHPA Land Use Adjacency Guidelines.

11.2 Transportation/Circulation

Intersections

Impact

Implementation of the proposed FPA has the potential to result in significant cumulative impacts to intersection operations at the following intersections:

- Friars Road/Riverdale Street (LOS F during the AM and PM peak hours);
- Mission Gorge Road/Zion Avenue (LOS F during the AM and PM peak hours);
- Mission Gorge Road/Princess View Drive (LOS F during the AM peak hour);
- Waring Road/Princess View Drive (LOS F during the AM peak hour);
- Waring Road/Zion Avenue (LOS F during the AM peak hour or LOS E during the PM peak hour);
- Fairmount Avenue/Mission Gorge Road (LOS F during the AM and PM peak hours);
- Fairmount Avenue/Alvarado Road/Camino Del Rio N. (LOS F during the AM and PM peak hours); and,
- Alvarado Canyon Road/Mission Gorge Place (LOS F during the AM and PM peak hours).

Mitigation Framework

Mitigation Measure T-1: Friars Road / Riverdale Street

Restripe northbound and southbound approaches to provide one left-turn lane, one through lane, and one right-turn lane. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T22).

Mitigation Measure T-2: Mission Gorge Road / Zion Avenue

Restripe westbound approach to provide dual left-turn lanes and a through/right-turn lane. Restripe eastbound approach to provide a dedicated right-turn lane. Also, remove the east-west split phase to provide protected left-turn phases. Even with the mitigation measures identified above, the FPA significant traffic impact to this intersection would be significant and unavoidable. ~~The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures.~~ This proposed intersection improvement project is identified in the Navajo PFFP (#T23).

Mitigation Measure T-3: Mission Gorge Road / Princess View Drive

Restripe southbound approach to provide a dedicated left-turn lane and a shared right-turn/through lane. Also, remove the split phase and provided protected left-turn phases. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T24).

Mitigation Measure T-4: Waring Road / Princess View Drive

Restripe westbound approach to provide a dedicated right-turn lane. Prohibit street parking along the westbound approach. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T25).

Mitigation Measure T-5: Waring Road / Zion Avenue

Restripe southbound approach to provide a dedicated right-turn lane. Prohibit street parking along the southbound approach. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of this mitigation measure. This proposed intersection improvement project is identified in the Navajo PFFP (#T26).

Mitigation Measure T-6: Fairmount Avenue / Mission Gorge Road

Widen the northbound approach to provide an additional (third) through lane. Provide a northbound right-turn overlap phase. Widen the southbound approach to provide three through lanes and a dedicated right-turn lane. Widen the eastbound approach to provide one left-turn lane, one through lane, and two right-turn lanes with overlap phasing. Also, remove the east-west split phase to provide protected left-turn phases. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. The Alvarado Canyon Road Realignment Project proposed at this location is identified in the Navajo PFFP (#T12).

Mitigation Measure T-7: Alvarado Canyon Road / Mission Gorge Place

Install a traffic signal at this intersection once warrants analysis is complete~~it is warranted~~. Widen the westbound approach to provide an exclusive right-turn lane. Widen the eastbound approach to provide a dedicated left-turn lane. The FPA significant traffic impact to this intersection would be fully mitigated with the implementation of these mitigation measures. This proposed intersection improvement project is identified in the Navajo PFFP (#T27).

Roadway Segments

Impact

Implementation of the proposed FPA has the potential to result in significant cumulative impacts to street segment operations at the following segments:

- Friars Road: I-15 NB Ramps to Rancho Mission Road (LOS F);
- Friars Road: Rancho Mission Road to Santo Road (LOS F);
- Friars Road: Santo Road to Riverdale Street (LOS F);
- Mission Gorge Road: Mission Gorge Place to Fairmount Avenue (LOS E);
- Mission Gorge Road: Rainier Avenue to Vandever Avenue (LOS E);
- Mission Gorge Road: Vandever Avenue to Twain Avenue (LOS F);

- Mission Gorge Road: Twain Avenue to Mission Gorge Place (LOS E);
- Fairmount Avenue: Vandever Avenue to Twain Avenue (LOS F):
- Fairmount Avenue: Mission Gorge Road to Alvarado Canyon Road (LOS F);
- Fairmount Avenue: Alvarado Canyon Road to I-8 WB Ramps (LOS F);
- Fairmount Avenue: I-8 WB Ramps to I-8 EB Ramps;
- Vandever Avenue: Riverdale Street to Mission Gorge Road (LOS E);
- Twain Avenue: Fairmount Avenue to Mission Gorge Road (LOS F);
- San Diego Mission Road: Rancho Mission Road to Fairmount Avenue (LOS F); and,
- Zion Avenue: Mission Gorge Road to Waring Road (LOS F).

Mitigation Framework

Mitigation Measure T-8: Friars Road from I-15 NB Ramps to Rancho Mission Road

Widen the roadway to 8-Lane Prime Arterial Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. ~~. The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure.~~ This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Even if the Mission Valley PFFP were amended and the Mission Valley Community Plan were updated, until the Mission Valley PFFP is fully funded, the traffic impact to this roadway segment would be significant and unmitigated.~~Therefore, the FPA significant traffic impact to this roadway segment would remain significant unmitigated~~.

Mitigation Measure T-9: Friars Road from Rancho Mission Road to Santo Road

Widen the roadway to 8-Lane Prime Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable. This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Even if the Mission Valley PFFP were amended and the Mission Valley Community Plan were updated, until the Mission Valley PFFP is fully funded, the traffic impact to this roadway segment would be significant and unmitigated. ~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure. This roadway segment is within the Mission Valley Community Planning Area, and this improvement project is not currently included in the Mission Valley PFFP. Therefore, the FPA significant traffic impact to this roadway segment would remain significant unmitigated.~~

Mitigation Measure T-10: Friars Road: Santo Road to Riverdale Street

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

Mitigation Measure T-11: Mission Gorge Road from Rainier Avenue to Vandever Avenue

Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvement Project is identified in the Navajo PFFP (#T19).

Mitigation Measure T-12: Mission Gorge Road from Vandever Avenue to Twain Avenue

Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).

Mitigation Measure T-13: Mission Gorge Road from Twain Avenue to Mission Gorge Place

Widen the roadway to 4-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T19).

Mitigation Measure T-14: Mission Gorge Road from Mission Gorge Place to Fairmount Avenue

Widen the roadway to 6-Lane Major Arterial. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. The Mission Gorge Road Improvements Project is identified in the Navajo PFFP (#T16).

Mitigation Measure T-15: Fairmount Avenue from Vandever Avenue to Twain Avenue

Provide a continuous two-way left-turn lane. Retain the street parking along both sides of the roadway. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T20).

Mitigation Measure T-16: Fairmount Avenue from Mission Gorge Road to Alvarado Canyon Road

Widen the roadway to a 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable ~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure.~~ The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).

Mitigation Measure T-17: Fairmount Avenue from Alvarado Canyon Road to I-8 WB Ramps

Widen the roadway to 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable ~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure.~~ The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).

Mitigation Measure T-18: Fairmount Avenue from I-8 WB Ramps to I-8 EB Ramps

Widen the roadway to 6-Lane Major Arterial. Even with the mitigation measure identified above, the FPA significant traffic impact to this roadway segment would be significant and unavoidable~~The FPA significant traffic impact to this roadway segment would be partially mitigated with the implementation of this mitigation measure.~~ The Fairmount Avenue Widening Project is identified in the Navajo PFFP (#T12).

Mitigation Measure T-19: Vandever Avenue from Riverdale Street to Mission Gorge Road
Restripe to provide a continuous two-way left-turn lane. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T28).

Mitigation Measure T-20: Twain Avenue from Fairmount Avenue to Mission Gorge Road
Restripe to provide a continuous two-way left-turn lane. The FPA significant traffic impact to this roadway segment would be fully mitigated with the implementation of this mitigation measure. This roadway improvement project is identified in the Navajo PFFP (#T29).

Mitigation Measure T-21: San Diego Mission Road from Rancho Mission Road to Fairmount Avenue
Widen the roadway to 4-Lane Collector Street would mitigate the FPA significant impact to San Diego Mission Road. However, widening of this roadway to 4-Lane Collector would require bridge widening over the San Diego River. The widening of this roadway would impact the San Diego River, wetlands, biological resources, and may conflict with the San Diego River Park Master Plan. Therefore, widening of the San Diego Mission Road and bridge widening are not recommended. ~~which is not included in any Public Facilities Financing Plan or funded Capital Improvement Program. Development project review would address significance of impacts on a project level basis.~~ Therefore, the FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

Mitigation Measure T-22: Zion Avenue from Mission Gorge Road to Waring Road
Widen the roadway to 4-Lane Major Street would mitigate The FPA significant impact to Zion Avenue. Widening of this roadway would impact surrounding residential properties, community character and on-street parking that is heavily utilized in this area. Therefore widening of this roadway segment is not recommended and the FPA significant traffic impact to this roadway segment would remain significant and unmitigated.

Traffic Generation

Impact

Implementation of the proposed FPA would increase density and ultimately result in a significant increase in traffic within the proposed FPA area.

Mitigation Framework

Development projects that comply with the supplemental regulations for CPIOZ-Type A and the regulations of the underlying zone, and can provide documentation from a California Registered Traffic Engineer stating that the proposed project's traffic volumes are based on the City's trip generation rates and are less than the thresholds established in the City of San Diego's Traffic Impact Study Manual can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations and generate traffic

volumes greater than the City's thresholds shall be subject to discretionary review in accordance with CPIOZ-Type B and the Mitigation Framework as detailed in Mitigation Measure T-23 through T-26, below.

Mitigation Measure T-23: Pedestrian Circulation Improvements

- Provide minimum 5 foot non-contiguous sidewalks on both sides of any vehicular access way (including private drives that a project creates on its property). Vehicular access ways shall connect to existing alleys, streets and adjacent development. (SDR 17)

- Provide a minimum 5 foot planting zone and minimum 10 foot sidewalk. The planting zone shall be adjacent to the curb and the sidewalk shall be between the planting zone and the building. (SDR 18)

- All crosswalks shall meet City standard for high visibility (Continential) crosswalks (See Standard Drawing SDM-116). All transverse type crosswalks within the public right-of-way shall be upgraded to new City standard crosswalks per City Adoption of High Visilbity Crosswalks. Additionally, the Navajo Community Plan Grantville - CPIOZ Section includes an SDR for use of enhanced pavement pattern. Median refuge, curb extensions, countdown signals etc. shall be included per City standards and Street Design Manual.

- Development shall provide a minimum of one pedestrian (and bicycle) connection to each adjacent property. These pedestrian (and bicycle) connections shall be coordinated and connected. Fencing or walls that limit access are prohibited. (SDR 21)

- Pedestrian connectivity to the San Diego River, the surrounding parks and transit shall be provided per the San Diego River Park Master Plan.

- ~~Provide sidewalks, landscaping and pedestrian-supportive lighting on all new and major streets.~~

- ~~All major crosswalks should be marked and enhanced crosswalk improvements such as pavement pattern, median refuge, curb extensions, countdown signals etc. should be considered.~~

- ~~Adequate pedestrian connectivity/access between various land uses should be provided. Provide pedestrian crossing on Friars Road at the Mission Gorge Road intersection.~~

- Provide direct access to Alvarado Creek from common areas and ground floor units. (SDR 38) and development along Alvarado Creek shall provide a 10 foot wide pedestrian and bicycle trail adjacent to the Alvarado Creek. (SDR 29)

- Provide a bridge at Mission Gorge/Fairmount Ave for the Alvarado Creek to connect to the San Diego River. Provide a pedestrian connection with the bridge for access to the River and Creek (San Diego River Park Master Plan).

- Primary access for each ground-floor commercial, office, retail, and residential unit/space shall be provided directly from the public right-of-way, public street, and/or internal street (SDR 6). All sidewalks, crosswalks and access to the entrances shall be ADA compliant. A straight, accessible path of travel shall be maintained clear without any obstructions (SDR 19).

~~• Pedestrian connectivity to the San Diego River, the surrounding parks and the transit should be emphasized.~~

~~• All sidewalks, crosswalks and access to the entrances should be ADA compliant.~~

~~• The pedestrian improvements within the study area should be consistent with the goals included in the City of San Diego Pedestrian Master Plan.~~

Mitigation Measure T-24: Bicycle Circulation Improvements

- Per the City of San Diego River Park Master Plan, provide the following:
  - Provide for a San Diego River Pathway connection to San Diego Mission Road from the north side of the river at Rancho Mission Road.
  - Provide a bridge at Mission Gorge/Fairmount Ave for the Alvarado Creek to connect to the San Diego River. Provide a bicycle connection with the bridge for access to the River and Creek (San Diego River Park Master Plan). Enhanced bike lanes and crossings shall be provided between the proposed San Diego River bike path and the existing Fairmount Avenue bike path.
  - Identify land for bicycle (and pedestrian) trail through land acquisition or open space easements and identify an alignment for the San Diego River Pathway as Grantville redevelops.
  - Development shall provide a minimum of one bicycle connection (and pedestrian) to each adjacent property. These bicycle connections shall be coordinated and connected. Fencing or walls that limit access are prohibited. (SDR 21)
  - Project shall be provided per City standard. Bike racks must be provided along the project's street frontage. (SDR 22)

~~Enhanced bike lanes and crossings should be provided between the proposed San Diego River bike path and the existing Fairmount Avenue bike path.~~

~~• Improve the bike trail crosswalk at the Mission Gorge Road/Camino del Rio North intersection.~~

~~• Bicycle connectivity to the San Diego River, the surrounding parks and transit should be emphasized.~~

~~• Provide sufficient bicycle parking (lockers and U-loops).~~

~~• Per the NFFP, complete the Mission Trails Bike Path Study (#T13)~~

~~• Per the NFFP, construct bicycle routes throughout the community (#T14)~~

- Per SANDAG's San Diego Regional Bicycle Plan, provide a Class I Bike Path along the San Diego River Bikeway Corridor.
- Per the City of San Diego Bicycle Master Plan, provide the following:
  - A Class II Bike Lane along Friars Road from I-15 SB Ramps to Mission Gorge Road
  - A Class II Bike Lane along Mission Gorge Road from Jackson Drive to Friars Road

- o A Class II Bike Lane along Mission Gorge Road from Friars Road to I-8/Fairmount Avenue interchange
- o A Class III Bike Route along Zion Avenue from Mission Gorge Road to Waring Avenue
- o A Class II Bike Lane along San Diego Mission Road from Rancho Mission Road to Twain Avenue
- o A Class II Bike Lane along Camino Del Rio North from east of Ward Street to Fairmount Avenue
- o A Class II Bike Lane along Mission Gorge Place from Alvarado Canyon Road to Fairmount Avenue.

Furthermore, the bicycle network improvements within the study area identified in the City of San Diego Bicycle Master Plan, SANDAG's San Diego Regional Bicycle Plan, and the Navajo Facilities Financing Plan should be implemented.

Mitigation Measure T-25: Transit Improvements

- Per the Navajo Community Plan Amendment, provide the following:
  - o All New projects shall provide wayfinding signage that identifies pedestrian and bicycle routes to and from the Grantville Trolley Station. (SDR 15)

~~All streets, which are directly served by transit should be designed or retrofitted to serve pedestrians since there must be adequate facilities to access transit. Provide sufficient ADA compliant pedestrian access to all mass transit facilities.~~

- ~~Bus Shelters should be provided at all bus stop locations in the FPA area.~~
- ~~Transit Priority Signals should be installed on all Mission Gorge Road Signals (from Friars Road to Camino del Rio North).~~
- ~~Based on the future ridership, increasing the bus frequency during peak periods should be considered. Bus stops should be considered within ¼ mile radius for every land use in the FPA area and bus routes should be reevaluated based on the proposed land uses.~~

Mitigation Measure T-26: **Transportation Demand Management (TDM) Improvements**

- Per Chapter 14 Article 2 Division 5 §142.0540 (c), provide the following:
  - o The TDM Plan shall be designed to reduce peak period automobile use with such techniques as carpooling, vanpooling, transit, bicycling, walking, telecommuting, compressed work weeks, or flextime.
  - o Transit pass or transit discounts shall be incorporated into TDM Plans and Programs.
  - o Intelligent Transportation System components shall be incorporated when possible with SANDAG ITS Program.
  - o Transit Service time (Priority signalizing) and transit only lanes shall be incorporated as part of traffic improvements.

~~TDM principals such as peak hour trip reduction, staggered work hours, ride sharing, telecommunication and promoting the usage of transit should be considered and promoted.~~

- ~~Intelligent Transportation System components should be utilized as appropriate.~~

~~Transit for individual projects should be considered. Transit service time (priority signalizing) and transit only lanes should be considered. Transit pass or transit discounts should be considered.~~

Freeway Segments/Ramps

Impact

Implementation of the proposed FPA has the potential to result in significant cumulative impacts to freeway ramp meter operations at the Friars Road to Northbound I-15 freeway ramp. In addition, implementation of the proposed FPA has the potential to result in significant cumulative impacts to freeway segment operations at the following freeway segments:

- I-15 NB: Aero Drive to Friars Road
- I-15 SB: Aero Drive to Friars Road
- I-15NB: Friars Road to I-8
- I-15 SB: Friars Road to I-8
- I-8 EB: I-15 to Fairmount Avenue
- I-8 WB: I-15 to Fairmount Avenue
- I-8 EB: Fairmount Avenue to Waring Road
- I-8 WB: Fairmount Avenue to Waring Road

Mitigation Framework

Mitigation Measures T-27 thru T-30: I-15 NB & SB: Aero Drive to I-8

San Diego Association of Governments (SANDAG) 2040 Revenue Constrained Regional Transportation Plan (RTP) proposes the construction of 2 managed lanes along I-15 between I-8 and SR-163. Project is expected to be built by Year 2020. This measure provides partial mitigation since it reduces the traffic demand on the freeway general purpose lane; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.

Mitigation Measures T-31 thru T-34: I-8 EB & WB: I-15 to Waring Road

SANDAG 2020 Revenue Constraint RTP includes operational improvements along I-8 between I-15 and SR-125. Project is expected to be built by Year 2040. This measure provides partial mitigation since it improves freeway operation in the vicinity of the project; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.

Mitigation Measure T-35: Friars Road to Northbound I-15 Ramp

No mitigation measures have been identified for this location. Mitigation measures that would potentially reduce vehicular queuing and freeway ramp metering impacts at this location consists of adding freeway lanes, auxiliary lanes, adding a lane to the freeway on-ramp, implementation of TDM measures that encourage carpooling and other alternate means of transportation or a combination of these measures. Additional roadway improvements would also be necessary along Friars Road; however, this interchange is located within the Mission Valley Community Plan, and will be evaluated in more detail in the upcoming Mission Valley Community Plan Update. As a result, the FPA significant traffic impact to this intersection would remain significant and unmitigated.

Mitigation Measure T-36: Friars Road / I-15 SB Off-Ramps Intersection

Caltrans is in the process of developing preliminary improvement plans for this location which will be shared with City staff once available. ~~No mitigation measures have been identified for this location. Additional through lanes along Friars Road would be needed to improve the traffic operations at this intersection to pre-project conditions or better which would require bridge widening. The existing bridge at this interchange is currently built to its ultimate classification per Mission Valley Community Plan.~~ It should be noted that this location is located within the Mission Valley Community Planning area where it will be evaluated in more detail in the upcoming Mission Valley Community Plan update. As a result, the FPA significant traffic impact to this intersection would remain significant and unmitigated.

Mitigation Measure T-37: **Fairmount Avenue / Alvarado Canyon Road / I-8 WB Off-Ramp / Camino Del Rio N. Intersection**

I-8/Fairmount Avenue interchange improvement project is included in the Navajo PFFP (# T12). This measure provides partial mitigation since it improves freeway and local roadway operation in the vicinity of the project; however, even with this improvement, the FPA traffic impact to this roadway segment is significant.

11.3 Air Quality and Odor

Cumulative Air Pollutant Emissions

Impact

The increase in future long-term operational emissions of particulates and ozone precursors associated with the proposed FPA would result in a significant air quality impact.

Mitigation Framework

The goals, policies, and recommendations of the City combined with the federal, state, and local regulations provide a framework for developing project-level air quality protection measures for future 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 and Community Plan, as amended by the

FPA. In general, implementation of the policies in the Community Plan, as amended by the FPA, and General Plan would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations would not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

Mitigation Measures AQ-1 and AQ-2 shall be implemented to reduce project-level impacts. Where mitigation is determined to be necessary and feasible, these measures shall be included in a Mitigation Monitoring and Reporting Program for the project.

Mitigation Measure AQ-1

For projects that would exceed daily construction emissions thresholds established by the City of San Diego, best available control measures/technology shall be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Best available control measures/technology shall include:

- Minimizing simultaneous operation of multiple pieces of construction equipment;
- Use of more efficient or low pollutant emitting, equipment, e.g. Tier III or IV rated
- equipment;
- Use of alternative fueled construction equipment;
- Dust control measures for construction sites to minimize fugitive dust, e.g. watering,
- soil stabilizers, and speed limits; and
- Minimizing idling time by construction vehicles.

Mitigation Measure AQ-2:

Development that would significantly impact air quality, either individually or cumulatively, shall receive entitlement only if it is conditioned with ~~all reasonable~~feasible mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects shall be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

11.4 Noise

Operational Noise

Impact

Future development activities associated with implementation of the proposed FPA have the potential to result in significant long-term operational noise impacts associated with traffic generated by the increased density of use in the FPA area.

Mitigation Framework

Future development project types that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulation for CPIOZ Type A and can demonstrate that there are no sensitive noise receptors present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework as detailed in Mitigation Measure N-1 and N-6, below.

Construction Noise

Impact

Future development activities associated with implementation of the proposed FPA have the potential to result in significant temporary noise impacts associated with demolition and construction of individual projects.

Mitigation Framework

Future development project types that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulation for CPIOZ Type A and can demonstrate that there are no sensitive noise receptors present on the project site can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework as detailed in Mitigation Measure N-1 through N-5.

Mitigation Measure N-1: Project Specific Noise Study

A noise survey shall be conducted to determine construction and operation impacts and identify methods that can be implemented to meet applicable noise standards. The noise survey shall be sufficient to indicate existing and projected noise levels to determine the amount of attenuation needed to reduce potential noise impacts to meet interior noise standards. See the Grantville CPIOZ section – Navajo Community Plan for supplemental design regulations.

Mitigation Measure N-2: Construction Equipment

Electrical power shall be used to run air compressors and similar power tools. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded with temporary noise barriers, such as barriers that meet a sound transmission class (STC) rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

Mitigation Measure N-3: Limit Operations Adjacent to Receivers

Limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to receivers to one at any given time.

Mitigation Measure N-4: Neighbor Notification

As part of applying for construction noise permits, p~~P~~rovide notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include a telephone number for local residents to call to submit complaints associated with construction noise. (SDMC Section 59.5.0404)

Mitigation Measure N-5: Noise Control Plan

Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements:

- Contractor shall turn off idling equipment.
- Contractor shall perform noisier operation during the times least sensitive to receptors.
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities.

For all noise-generating construction activities, additional noise attenuation techniques shall be employed as necessary to reduce noise levels. Such techniques shall include, but are not limited to, the use of sound blankets, noise shrouds and temporary sound barriers between construction sites and nearby sensitive receptors as specified in the noise control plan.

Mitigation Measure N-6:

Where new projects would expose residences to noise exceeding normally acceptable levels, the City of San Diego shall require the ~~consideration~~ use of various sound attenuation techniques as ~~required by~~ prescribed in the California Energy Code Title 24 standards. These standards specify construction methods and materials that result in energy efficient structures and up to a 30 dBA reduction in interior noise levels (assuming that windows are closed).

Requirements may include the use of appropriate setbacks and sound attenuating building design, including retrofit of existing structures with sound attenuating building materials where feasible. Such measures may include, but are not limited to dual-paned windows, solid core exterior doors with perimeter weather stripping, air conditioning system so that windows and doors may remain closed and situating exterior doors away from roadways.

In instances where use of these techniques is not feasible, the use of sound barriers (earthen berms, sound walls, or some combination of the two) will be considered. Whenever possible, a combination of elements should be used, including solid fences, walls, and landscaped berms. Determination of appropriate noise attenuation measures will be based on a noise study ~~assessed on a case-by-case basis during a project's permitting and/or environmental review process~~ pursuant to City of San Diego regulations. This shall be accomplished during the permitting and/or environmental review process~~project's permitting and/or environmental review process~~.

11.5 Biological Resources

Jurisdictional Biological Resources

Impact

Future project-specific developments located adjacent to or within areas under the jurisdiction of federal, state, or local biological resources regulatory agencies have the potential to result in significant impacts to jurisdictional biological resources.

Mitigation Framework

Mitigation is required for impacts that are considered significant under the City of San Diego's Biology Guidelines (2012) and the City of San Diego's CEQA Significance Determination Thresholds (2011). All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. For future projects that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulations for CPIOZ-Type A, and can demonstrate that no biological resources are present, the project can be processed ministerially and would not be subject to further environmental review under CEQA. Future development that does not comply with CPIOZ-Type A shall be subject to review in accordance with CPIOZ-Type B, and shall implement the Mitigation Framework detailed in Mitigation Measures BR-1 through BR-5~~6~~, below. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance.

Mitigation Measure BR-1:

To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the FPA area, all subsequent projects within CPIOZ Type B areas shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within the FPA area, focused presence/absence surveys shall be conducted in accordance with the biology guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on

project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the FESA, MBTA, Bald and Golden Eagle Protection Act, California Endangered Species Act (CESA), MSCP Subarea Plan, and ESL Regulations.~~Prior to any project impacts occurring within areas under the jurisdiction of federal, state, or local biological resource regulatory agencies, the project applicant for the specific work shall obtain any and all applicable resource agency permits which may include, but are not limited to, Clean Water Act 404 and 401 permits and California Department of Fish and Wildlife Streambed Alteration Agreements.~~

Sensitive Habitat

Impact

Future project-specific developments within the proposed FPA area have the potential to result in significant impacts to adjacent Tier I-III habitats.

Mitigation Framework

Mitigation Measure BR-2:

Mitigation for Impacts to Sensitive Upland Habitats. Future projects implemented in accordance with the FPA resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines (see Table 11.5-1) MSCP Subarea Plan. Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities including but not limited to riparian habitats, wetlands, oak woodlands, and coastal sage scrub consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City Biology Guidelines.

Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines. These mitigation ratios are based on Tier level of the vegetation community, the location of the impact and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

TABLE 11.5-1
MITIGATION RATIOS FOR IMPACTS TO UPLAND VEGETATION COMMUNITIES AND LAND COVER TYPES

Tier	Habitat Type	Mitigation Ratios
TIER 1 (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Location of Preservation Location of Impact: Inside* — Inside 2:1, Outside 3:1; Outside — Inside 1:1, Outside 2:1
TIER II (uncommon uplands)	Coastal Sage Scrub Coastal Sage Scrub/ Chaparral	Location of Preservation Location of Impact: Inside* — Inside 1:1, Outside 2:1; Outside — Inside 1:1, Outside 1.5:1
TIER III A (common uplands)	Mixed Chaparral Chamise Chaparral	Location of Preservation Location of Impact: Inside* — Inside 2:1, Outside 3:1; Outside — Inside 1:1, Outside 2:1
TIER III B (common uplands)	Non-Native Grasslands	Location of Preservation Location of Impact: Inside* — Inside 1:1, Outside 1.5:1; Outside — Inside 0.5:1, Outside 1:1

Notes:
For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind).
For impacts on Tier II, IIIA, and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Project-specific mitigation will be subject to applicable mitigation ratios at the time of project submittal.

~~Significant impacts to City Tier I-III habitats shall be mitigated as shown in Table 5.1-6 of Section 5.1, Land Use of this PEIR.~~

~~TABLE 5.1-6~~

~~City of San Diego Mitigation Requirements~~

~~for Habitat Impacts Outside and Inside of the MHPA~~

~~TIER~~	~~HABITAT TYPE~~	~~REQUIRED MITIGATION RATIOS~~
~~TIER 1:~~ ~~(rare uplands)~~	~~Southern Foredunes~~ ~~Torrey Pines Forest~~ ~~Coastal Bluff Scrub~~ ~~Maritime Succulent Scrub~~ ~~Maritime Chaparral~~ ~~Scrub Oak Chaparral~~ ~~Native Grassland~~ ~~Oak Woodlands~~	~~**Impact Outside of MHPA**~~ ~~Preservation Inside MHPA: 1:1~~ ~~Preservation Outside MHPA: 2:1~~ ~~**Impact Inside of MHPA**~~ ~~Preservation Inside MHPA: 2:1~~ ~~Preservation Outside MHPA: 3:1~~

~~TIER II:~~ ~~(uncommon uplands)~~	~~Coastal Sage Scrub (CSS)~~ ~~CSS/Chaparral~~	~~**Impact Outside of MHPA**~~ ~~Preservation Inside MHPA: 1:1~~ ~~Preservation Outside MHPA: 1.5:1~~ ~~**Impact Inside of MHPA**~~ ~~Preservation Inside MHPA: 1:1~~ ~~Preservation Outside MHPA: 2:1~~
~~TIER III A:~~ ~~(common uplands)~~	~~Mixed Chaparral~~ ~~Chamise Chaparral~~	~~**Impact Outside of MHPA**~~ ~~Preservation Inside MHPA: 0.5:1~~ ~~Preservation Outside MHPA: 1:1~~ ~~**Impact Inside of MHPA**~~ ~~Preservation Inside MHPA: 1:1~~ ~~Preservation Outside MHPA: 1.5:1~~
~~TIER III B:~~ ~~(common uplands)~~	~~Non-native Grasslands~~	~~**Impact Outside of MHPA**~~ ~~Preservation Inside MHPA: 0.5:1~~ ~~Preservation Outside MHPA: 1:1~~ ~~**Impact Inside of MHPA**~~ ~~Preservation Inside MHPA: 1:1~~ ~~Preservation Outside MHPA: 1.5:1~~
~~TIER IV:~~ ~~(other uplands)~~	~~Disturbed Land~~ ~~Agriculture~~ ~~Eucalyptus Woodland~~ ~~Ornamental Plantings~~	~~Impacts to these areas are less than significant; no mitigation required.~~

~~Source: Rocks Biological Consulting, 2014.~~

Wetlands

Impact

Future project-specific developments located adjacent to the San Diego River and Alvarado Creek have the potential to result in significant wetland resource impacts.

Mitigation Framework

Mitigation Measure BR-~~4~~3:

To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the FPA shall be required to comply with USACE Clean Water Act Section 404 requirements and special conditions, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net-loss of wetland habitats.

Prior to obtaining discretionary permits for future actions implemented in accordance with the PFA, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. Any required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the USACE's 1987 *Wetlands Delineation Manual* and the *Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region*. A determination of the presence/absence and boundaries of any WoUS and WoS shall also be completed following the appropriate USACE guidance documents for determining the OHWM boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of

CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by California Coastal Commission and the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.

Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options; Essential Public Projects, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts to wetland be avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.6-6a and b below. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland.

- For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved. The Biologically Superior Option mitigation shall include either (1) standard mitigation per Table 11.5-2a, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 11.5-2b is required.

TABLE 11.5-2a
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(With Biologically Superior Design)

Vegetation Community	Mitigation Ratio
Riparian	2:1 to 3:1
Vernal pool*	2:1 to 4:1
Basin with fairy shrimp*	2:1 to 4:1
Freshwater marsh	2:1

*The City currently does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

TABLE 11.5-2b
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS
(Without Biologically Superior Design)

Vegetation Community	Mitigation Ratio
Riparian	4:1 to 6:1
Vernal pool*	4:1 to 8:1
Basin with fairy shrimp*	4:1 to 8:1
Freshwater marsh	4:1

*The City currently does not have take authority for vernal pools. A draft vernal pool HCP is currently being prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:

- **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.

- **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.

- **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.

- **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur

within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.

Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Assistant Deputy Director (ADD)/Environmental Designee prior to any construction activity:

- Compliance with USACE Section 404 nationwide permit;
- Compliance with the RWQCB Section 401 Water Quality Certification; and
- Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.

~~Any significant wetland/waters of the U.S. resource impacts to the San Diego River or other such features located in the planning area identified during the site specific environmental review shall be mitigated within the immediate area of the impact action where feasible.~~

Sensitive Plants and Animals

Impact

Future project-specific developments within the proposed FPA area have the potential to result in significant impacts to federal and/or state listed sensitive species. Future project-specific developments have the potential to result in significant impacts to adjacent nesting bird habitats and nesting birds. BR-3~~4~~ and~~through~~ BR-5~~6~~

Mitigation Framework

Mitigation Measure BR-3~~4~~:

Mitigation for Short-term Impacts to Sensitive Species from Project Construction. Specific measures necessary for reducing potential construction-related noise impacts to the coastal California gnatcatcher, least Bell's vireo, and the cactus wren are further detailed in LU-3 and BR-4.

Mitigation for impacts to sensitive wildlife species (including temporary and permanent noise impacts) resulting from future projects implemented in accordance with the FPA are included in Sections 5.1.6 (Land

Use) and 5.6.3 (Biological Resources). Please refer to Mitigation Framework BR-1 through BR-5 and LU-3 (MHPA Land Use Adjacency Guidelines).

~~Where potential impacts to non-MSCP covered federal and/or state listed sensitive species and/or narrow endemic species may occur as a result of future development actions, coordination with responsible listing agencies (USFWS and/or CDFW) shall commence as early as practicable and in conjunction with, or prior to, the CEQA process for actions that may affect these species. Specific actions necessary to protect these sensitive species shall be determined on a case-by-case basis.~~

Mitigation Measure BR-5:

Mitigation for Migratory Wildlife. Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the FPA area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in BR-1 during the subsequent development review process. The Biology Report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities (e.g., non-native grassland to riparian or agricultural to developed land) to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting or foraging activities shall be addressed in the Biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species specific mitigation plans in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, State Fish and Game Code, and/or the ESL Regulations.

~~Project actions resulting in impacts to nesting migratory birds (as defined under the Migratory Bird Treaty Act [MBTA]) shall incorporate seasonal timing constraints for any wetland habitat clearing or shall require work corridor surveys for nesting birds. Where active nests are identified, these shall be avoided if practical, and if necessary, a MBTA Special Purpose Permit (50 CFR §21.27) shall be completed before removal of active nests of MBTA covered species.~~

~~**Mitigation Measure BR-6:**~~

~~Impacts on nesting birds shall be avoided in compliance with California Fish and Game Code (§3503) under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs.~~

11.6 Hydrology/Water Quality

Runoff/Water Quality

Impact

Implementation of the proposed FPA is expected to result in an increase in runoff volumes and peak flow rates for certain drainage basins which outlet into wetland vegetation communities located within the San Diego River and Alvarado Creek. Adherence to federal, state, and local regulations would serve to reduce significant impacts to a degree, but cannot guarantee that all future project-level impacts would be avoided or mitigated to below a level of significance. Therefore, impacts associated with hydrology and water quality would be significant at the program-level.

Mitigation Framework

Mitigation Measure HYD-1:

All future project-specific developments shall be reviewed by City staff for potential runoff volumes and peak flow rate impacts (see City of San Diego Water Management and Disclosure Ordinance). If City Staff determines that a future project specific development would potentially result in runoff impacts, the preparation of a project-specific Hydrology Study and Water Quality Technical Report will be required. The project-specific reports would identify specific mitigation measures such as on-site detention basins or bioretention facilities that would need to be implemented into the design and construction of the project.

Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing onsite filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss.

To accommodate vector control, any measure used to control runoff or protect water quality shall ensure that it does not result in 0.5-inch or more of standing water for more than 96 hours.

San Diego Regional Water Quality Control Board and Municipal Code Compliance

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.

- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Stormwater Regulations.
- In accordance with the City of San Diego Stormwater Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

11.7 Historical Resources

Prehistoric/Historic Resources

Impact

Implementation of the proposed FPA would facilitate future development that has the potential to significantly impact five parcels located within the proposed FPA area recommended for future evaluation as containing potentially eligible historic resources in the City Register or CRHR.

Mitigation Framework

Mitigation Measure HR-1:

Prior to issuance of any permit for a future development project ~~implemented in accordance with the FPA that would directly or indirectly affect a building/structure in excess of 45 years of age~~, the City shall determine whether any structure in excess of 45 years of age has potential historical significance~~the affected building/structure is historically significant~~. All buildings on a parcel shall be evaluated together. 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 Historic Resources 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:

a. Preparing a historic resource management plan;
b. Designing 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);
c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
d. 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;
e. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning; and
f. Removing industrial pollution at the source of production.

Specific types of historical resource reports, outlined in Section III of the HRG, 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. If required, mitigation programs can also be included in the report.

Religious/Sacred Uses and Human Remains

Impact

Impacts to known resources and those not yet found and formally recorded could occur anywhere within the FPA area. Potential impacts to historical resources associated with construction of projects implemented in accordance with the FPA would be considered significant.

Mitigation Framework

The Mitigation Framework for human remains would be the same as for archaeological resources. Refer to the Mitigation Framework as outlined in Mitigation Measure HR-2, below.

Archaeological Resources

Impact

Implementation of the proposed FPA has the potential to result in significant impacts to unknown archaeological resources located within the proposed FPA area during project-specific construction activities.

Mitigation Framework

Mitigation Measure HR-2:

Prior to issuance of any permit that could directly affect an archaeological resource or resources associated with prehistoric Native American activities, 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 that may be impacted by a development activity.

Initial Determination:

The environmental analyst shall 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 California Historical Resources Inventory System) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then an evaluation consistent with the City of San Diego's Historical Resources Guidelines shall be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains archaeological resources, preparation of an evaluation report is required. The evaluation report could generally include background research, a field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required that 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 Native American Heritage Commission (NAHC) must also be conducted at this time. Information about existing archaeological collections shall also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. 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 must be performed by a qualified archaeologist.

Step 2:

Once a resource has been identified, a significance determination must be made. It should be noted that tribal representatives and/or Native American monitors must be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representatives, 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). An archaeological testing program will be required, which includes 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 of San Diego's Historical Resources Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Historical Resources Guidelines and in accordance with the provisions outlined in Section 15064.5 of the State CEQA Guidelines. If significant historical resources are identified within the project's Area of Potential Effect (APE), the site may be eligible for local designation. At this time, 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 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 archaeological 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 (RDDRP) is required or is required to follow alternate treatment recommendations by the Most Likely Descendant (MLD), which includes a Collections Management Plan for review and approval. 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. If the archaeological site is an historical resource, then the limits on mitigation provided under CEQA Section 21083.2 shall not apply, and treatment in accordance with CEQA Guidelines Section 15162.4 and 21084.1 is required. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring shall 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 (TCP) or any archaeological site located on City property or within the APE 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 Public Resources Code Section 5097 must be followed. These provisions would be outlined in the MMRP included in the 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 in conformance with the California Office of Historic Preservation (OHP) "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental Analysis Section 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 TCPs 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 that 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 of San Diego. Appendix D (Historical Resources Report Form) shall be used when no archaeological resources were identified within the project boundaries.

Step 5:

For all 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. 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., AB 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) 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 must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must 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 Collections (dated May 7, 1993) and, if federal funding is involved, 36CFR79 of the Federal Register. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

11.8 Geologic Conditions

Geologic Hazards

Impact

The FPA area contains geologic conditions that would pose significant risks for future development if not properly addressed at the project-level. Unstable conditions relating to strong seismic shaking, landslides, shallow groundwater, liquefaction, and seismically induced settlement represent a potentially significant impact for future development.

Mitigation Framework

Mitigation Measure GC-1:

Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

~~11.9 Paleontological Resources~~

~~*Impact*~~

~~Implementation of the CPU has the potential to result in significant impacts to paleontological resources. Grading would exceed the depth and volume indicated in Table 5.12-1. As such, FPA implementation would result in grading that would impact fossil resources relevant to understanding earth's history, if the fossils are not recovered and salvaged. Specifically, future projects implemented in accordance with the FPA that would involve substantial grading within the Mission Valley Formation, Stadium Conglomerate, and/or Friars Formation would result in the loss of significant fossil remains. It should be noted however, that for future projects that are consistent with the CPU, base zone regulations and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present; the project can be processed ministerially and would not be subject to further environmental review under CEQA.~~

~~*Mitigation Framework*~~

~~For future development project types that are consistent with the Navajo Community Plan, as amended by this FPA, base zone regulations, and the supplemental regulations for CPIOZ Type A and can demonstrate that no paleontological fossil resources are present on the project site; the project can be processed ministerially and would not be subject to further environmental review under CEQA. Development proposals that do not comply with the CPIOZ Type A supplemental regulations shall be subject to discretionary review in accordance with CPIOZ Type B and the Mitigation Framework for Paleontological Resources further detailed below.~~

~~Mitigation Measure PR-1:~~

~~Prior to the approval of subsequent development projects implemented in accordance with the CPU, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted under CPIOZ Type B, 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~~

~~The environmental analyst shall complete a project level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS 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 resource potential geologic deposit/formation/rock unit.~~
~~Require over 2,000 cubic yards of excavation and/or a 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.~~

~~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 MMRP shall be implemented during construction grading activities.~~

~~11.10~~ 11.9 Health and Safety

Wildfire Hazards

Impact

Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires.

Mitigation Framework

Mitigation Measure HS-1:

Future projects ~~implemented in accordance with the CPU shall be~~are required to incorporate sustainable development and other measures ~~into site plans in accordance with the City's Brush Management Regulations, and~~in accordance with the Land Development Code - Landscape Standards ~~pursuant to General Plan and CPU policies~~which are intended to reduce the risk of wildfires. In addition, all future projects shall be reviewed for compliance with the 2010 California Fire Code, Section 145.0701 through 145.0711 of the LDC, and Chapter 7 of the California Building Code.

Impact

Future development activities within the proposed FPA area have the potential to be located on a site with potentially contaminated soil and/or groundwater that may have been impacted by releases of hazardous materials or petroleum products from surficial spills, subsurface releases from USTs, or other sources. Excavation of potentially contaminated soil may expose people to hazardous materials/waste and/or toxic substances.

Mitigation Framework

Mitigation Measure HS-2:

Property-specific due diligence processes shall be conducted by qualified environmental professionals, in accordance with applicable guidelines and regulations, on specific properties within the proposed FPA area prior to property transactions and/or future development. Phase I Environmental Site Assessments (ESAs) shall be conducted by qualified environmental professionals in accordance with the standard of care at that time (currently the American Society for Testing and Materials Standard Practice E1527-13) and applicable regulations (currently the EPA 40 Code of Federal Regulations §312 titled "Standards and Practices for All Appropriate Inquiries").

Mitigation Measure HS-3:

For properties within the proposed FPA area with suspected or documented soil and/or groundwater contamination or other potential environmental concerns, further evaluation, such as Phase II ESAs and/or remediation activities, shall be conducted prior to or during future development activities by appropriately certified and/or registered professionals in accordance with a work plan that is approved by the regulatory

agency having oversight of the activities. Results of previous assessment activities for a property (e.g., previous Phase II ESAs, UST removal sampling data), if any, shall be evaluated by certified and/or registered professionals prior to future development activities.

Mitigation Measure HS-4:

The "case closure" regulatory status shall be reevaluated prior to future development activities by a qualified environmental professional in conjunction with the regulatory agency having oversight of the activities for unauthorized release properties when a site use change is part of the planned future development (e.g., from industrial to residential use).

Mitigation Measure HS-5:

For properties with documented or suspected impacts to soil and/or groundwater, appropriate worker and community health and safety measures shall be implemented by the contractor, under the oversight of a qualified environmental professional, during soil/groundwater disturbance activities (e.g., dust control, air monitoring, stockpile management).

Mitigation Measure HS-6:

It is possible that contaminated soil and/or groundwater, not identified during the technical study, may be present within the proposed FPA area (e.g., lead in shallow soil, burn pits). For this reason, the following precautions shall be observed during excavation activities associated with the improvements conducted during future development:

- Pre-project activities (e.g., planning or early design) shall include site-specific environmental evaluation to address hazardous materials concerns related to worker and community health and safety, waste generation and disposal, and regulatory requirements.
- Caution shall be taken during excavation activities near the facilities associated with unauthorized releases, because of the potential for encountering documented and undocumented releases of contaminants and hazardous materials or wastes that may have occurred within or adjacent to these sites. Excavation and/or soil monitoring shall be conducted by professionals trained in the identification and management of hazardous materials or wastes, such as contaminated soil or groundwater.
- Appropriate references to the potential to encounter contaminated soil or groundwater shall be included in construction specifications.
- A Site Health and Safety Plan shall be prepared and implemented prior to initiation of construction activities within the boundaries of the proposed FPA area to reduce potential health and safety hazards to workers and the public.

Mitigation Measure HS-7:

Soil generated during construction activities for future development (e.g., subsurface excavation, grading) at contaminated properties may require chemical characterization (e.g., analytical testing) by a qualified environmental professional prior to reuse, export, or disposal.

Mitigation Measure HS-8:

Further assessment is recommended to be performed by a qualified environmental professional if discolored soil or other potential environmental issues are encountered in the proposed FPA area during construction/future development activities. If contamination is discovered, regulatory agencies may require additional environmental investigation and/or mitigation to be conducted by the property owner, particularly if there is the potential to affect public health, safety, and/or the environment.

Mitigation Measure HS-9:

Future development of impacted or potentially impacted properties involving soil excavation, grading, or other subsurface disturbance shall include implementation of a soil and groundwater management plan to address the possibility of encountering localized areas of potential environmental concern. The plan shall be prepared by a qualified environmental consultant and shall be implemented during soil/groundwater disturbance activities under the oversight of an environmental professional on behalf of the property owner/developer. The plan shall address monitoring of excavated soil, community and worker health and safety, and soil and groundwater handling, stockpiling, characterization, on-site reuse, export, and disposal protocols. Appropriate references to the potential to encounter contaminated soils and/or groundwater shall be included in construction specifications and bid documents so that the contractor can consider various factors (e.g., groundwater pumping rates, soil disposal) in their work.

Mitigation Measure HS-10:

Groundwater at certain locations within the proposed FPA area has been documented as being impacted. Based on evidence of shallow groundwater depths (i.e., as shallow as 9 feet below adjacent ground surface) at some locations, if dewatering activities are planned for construction or other proposed improvements, they may be subject to increased disposal costs or other environmental surcharges (e.g., permitting) as a result of the presence of contaminated groundwater. A discharge permit will likely be required for dewatering, and water may need to be characterized by a qualified environmental consultant and/or treated prior to discharge. The RWQCB and/or agency providing oversight of wastewater discharge shall be contacted by a qualified environmental consultant in conjunction with the contractor and/or property owner for guidance on the requirements for discharge of dewatering effluent, prior to initiation of construction activities. The groundwater management plan mentioned in the previous bullet shall be implemented by a contractor during construction activities if groundwater is expected to be encountered.

Mitigation Measure HS-11:

Prior to renovation or demolition of structures, surveys shall be conducted for the presence of hazardous building materials such as asbestos-containing materials, lead-containing surfaces, and other materials falling under UWR requirements. The surveys shall be conducted by California Department of Public Health Certified Lead Inspector/Assessors and California Division of Occupational Safety and Health Certified Asbestos Consultants in accordance with applicable local, state, and federal guidelines and regulations. Prior to renovation or demolition of buildings, appropriate abatement measures shall be implemented by a licensed abatement contractor using trained and certified workers and supervisors.

Mitigation Measure HS-12:

For sites where structures are to be demolished, especially structures built in the 1970s or earlier, analyze surface and shallow soils for lead and termiticides prior to demolition or soil disturbance (e.g., grading).

~~11.11~~ 11.10 Public Utilities

Solid Waste

Impact

The proposed FPA has the potential to have a cumulative impact on solid waste facilities.

Mitigation Framework

Mitigation Measure PU-1:

Pursuant to the City's Significance Determination Thresholds, future subsequent development projects (including construction, demolition, and /or renovation) that would generate 60 tons or more of solid waste shall be required to prepare a Waste Management Plan (WMP). The WMP shall be prepared by the applicant, conceptually approved by the Environmental Services Department and discussed in the environmental document. The WMP shall be implemented by the applicant and address the demolition, construction, and occupancy phases of the project as applicable to include the following:

a. A timeline for each of the three main phases of the project (demolition, construction, and occupancy).
b. Tons of waste anticipated to be generated (demolition, construction, and occupancy).
c. Type of waste to be generated (demolition, construction, and occupancy).
d. Describe how the project will reduce the generation of C&D debris.
e. Describe how the C&D materials will be reused on-site.
f. Include the name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on-site.
g. Describe how the C&D waste will be source separated if a mixed C&D facility is not used for recycling.
h. Describe how the waste reduction and recycling goals will be communicated to subcontractors.
i. Describe how a "buy recycled" program for green construction products, including mulch and compost, will be incorporated into the project.
j. Describe how the Refuse and Recyclable Materials Storage Regulations (LDC Chapter 14, Article 2 Division 8) will be incorporated into design of building's waste storage area.
k. Describe how compliance with the Recycling Ordinance (Municipal Code Chapter 6, Article 6, Division 7) will be incorporated in the operational phase.
l. Describe any International Standards of Operation 1, or other certification, if any.

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13.0 CERTIFICATION

This document has been completed by the City's Environmental and Resource Analysis Division under the direction of the Planning Department Director and is based on independent analysis and determinations made pursuant to the San Diego Municipal Code Section 128.0104. The following individuals contributed to the preparation of this report. Resumes of EIR preparers are on file and available for review at the City of San Diego, Planning Department, 1222 First Avenue, Fifth Floor, San Diego, CA 92101.

A list of contributing City and consultant staff members, their titles and affiliations, is provided below.

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The following persons and organizations were contacted in preparation of this Program Environmental Impact Report:

San Diego Unified School District

Sarah Hudson, Demographer

Grantville Focused Plan Amendment
Final Programmatic Environmental Impact Report

Appendix A

Notice of Preparation and Responses

May 2015

THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
Date of Notice: November 5, 2013
PUBLIC NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
AND
PUBLIC NOTICE OF AN ENVIRONMENTAL IMPACT REPORT SCOPING MEETING
IO: 21003209

Public Notice: The City of San Diego Entitlements Division as the Lead Agency has determined that the project described below will require the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a project EIR and Scoping Meeting was publicly noticed and distributed on November 5, 2013. This notice was published in the San Diego Daily Transcript and placed on the City of San Diego website at the following location on November 5, 2013: **http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html**. The City is inviting your comments regarding the scope and content of the document. **Your comments must be received within 30 days of receipt of this notice/date of the Public Notice above.** Please send your written comments to the following address: **Brian Schoenfisch, Senior Planner, City of San Diego, 1222 First Avenue, MS 413, San Diego, CA 92101 or e-mail your comments to BSchoenfisch@sandiego.gov with the Internal Order No. 21003209 in the subject line.** Responsible agencies are required to indicate their statutory responsibilities in connection with this project when responding. An EIR incorporating public input will then be prepared and distributed for public review and comment.

Scoping Meeting: A scoping meeting will be held by the City of San Diego Planning, Neighborhoods, and Economic Development Department on **Tuesday, November 19th, 2013 from 6:00 to 8:00 p.m. at Mission Trails Visitor Center, 1 Father Junipero Serra Trail San Diego, CA 92119, (619) 668-3275.** The meeting could end early depending on attendance. Verbal and written comments regarding the scope and alternatives of the proposed Environmental Impact Report (EIR) will be accepted at the meeting.

General Project Information:
- Project Name/No.: Grantville Focused Plan Amendment, SCH No. Pending
- Community Plan Area: Navajo Community Planning Area
- Council District: 7

Project Description: The project location, referred to as "Subarea A," is located within the former Grantville Redevelopment Project Area, within the eastern portion of the City of San Diego, in San Diego County. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles. Subarea A is a 379-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A was formerly addressed by the Program EIR for the Grantville Redevelopment Project (March 2005, SCH #2004071122) prepared for the City of San Diego Redevelopment Agency.

The Grantville Focused Plan Amendment consists of three components: (1) a focused amendment to the Navajo Community Plan, (2) the processing of rezones, and (3) an update to the Navajo Facilities Finance Plan. The Focused Plan Amendment and rezones would introduce residential and mixed-use development to the Grantville neighborhood, currently comprised of predominately industrial and commercial uses. The proposal was developed through a series of design charrettes and several years of monthly stakeholder meetings.

Through an extensive public meeting process the Grantville Stakeholders Committee has recommended Alternative D as the CEQA project to be analyzed in the Program level Environmental Impact Report. Alternative D would result in a net increase of approximately 8,275 residential dwelling units over what would be allowed by the existing community plan. The Grantville Focused Amendment to the Navajo Community Plan will set out the long-range vision and comprehensive policy framework for how Subarea A could develop over the next 20 to 30 years. The Amendment will provide policy direction for future development and has been guided by the City of Villages growth strategy and citywide policy direction contained within the City of San Diego's General Plan (2008).

The proposed project would rezone Subarea A from predominately single-use commercial and industrial zones to multiple-use zones which promote transit-oriented development. Alternative D would be implemented through the adoption of three new zones: 1). CC-3-6, a community commercial zone which will emphasize pedestrian orientation and allow up to 44 dwelling units per acre. 2). CC-3-8, a community commercial zone which will emphasize pedestrian orientation and allow up to 73 dwelling units per acre. 3). RM-3-7, a multiple dwelling unit residential zone which will allow for limited commercial uses and allow up to 44 dwelling units per acre. The application of these zones, together with the adoption of a new Community Plan Implementation Overlay Zone (CPIOZ), will serve as the implementation tools to achieve the proposed land use amendments associated with Alternative D. The proposed CPIOZ, referred to as the "Grantville TOD CPIOZ", will promote mixed-use, transit-oriented development with pedestrian and bicycle orientation, and allow for increased density in the area surrounding the Grantville Light Rail Trolley Station, up to 109 dwelling-units per acre, when certain criteria are met. The list of criteria will be included in the text of the Navajo Community Plan, as a focused amendment to the plan.

Applicant: The City of San Diego

Recommended Finding: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: **Land Use, Traffic/Circulation and Parking, Air Quality and Odor, Greenhouse Gas Emissions, Noise, Biological Resources, Hydrology and Water Quality, Historical Resources, Visual Effects/Neighborhood Character, Geologic Conditions, Paleontological Resources, Health and Safety, Public Services and Facilities, Public Utilities.**

Availability in Alternative Format: To request this Notice, the Scoping Letter, and/or supporting documents in alternative format, call the Development Services Department at (619) 446-5460 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Jeff Szymanski at (619) 446-5324. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact the Project Manager, Brian Schoenfisch at (619) 533-6457.

Cathy Winterrowd
City of San Diego
Interim Deputy Director
Development Services Department

Attachments:

Figure 1: Regional Vicinity Map
Figure 2: Existing Land Use
Figure 3: Navajo Community Plan Land Use
Figure 4: Proposed Land Use (Alternative D)

Distribution:

Federal Government:

Federal Aviation Administration (1)
US Department of Transportation (2)
US Department of Housing & Urban Development (7)
Environmental Planning Division Naval Facilities (12)
U.S. Army Corps of Engineers (16)
U.S. Environmental Protection Agency (19)
U.S. Fish & Wildlife Service (23)
U.S. Army Corps of Engineers (26)

State of California

California Department of Transportation Planning - CALTRANS (31)
California Department of Fish & Wildlife (32)
California Integrated Waste Management Board (35)
State Department of Health Services – Environmental Management (36)
State Department of Health Services – Noise Control (37)
California Environmental Protection Agency (37A)
Housing and Community Development Department (38)
Department of Toxic Substance Control (39)
California Department of Parks and Recreation (40)
Resources Agency (43)
Regional Water Quality Control Board: Region 9 (44)
Department of Water Resources (45)
State Clearinghouse (46)
Air Resources Board (49)
Office of Attorney General (50)
State Water Resources Control Board (55)
Native American Heritage Commission (56)
Office of Planning and Research (57)
California Energy Commission (59)
California Department of Conservation (61)
California State Lands Commission (62)

County of San Diego

Air Pollution Control District (65)
San Diego County Tax Assessor (67)
Department of Planning and Land Use (68)
Department of Park and Recreation (69)
Department of Public Works (70)
County Water Authority (73)
Department of Environmental Health Services (74)
Department of Environmental Health Services – Hazardous Material (75)
Department of Environmental Health – Land and Water Quality Division (76)

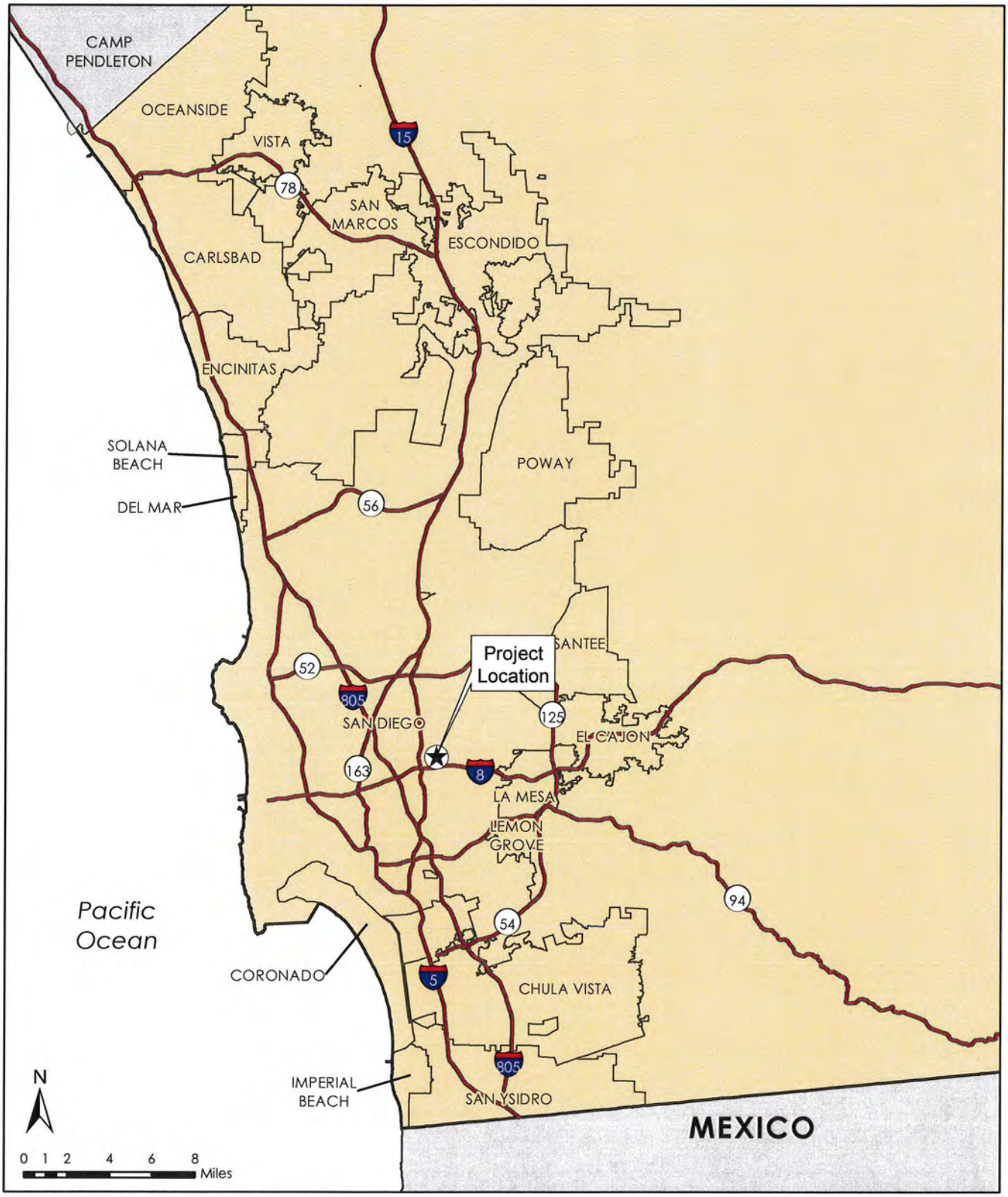
City of San Diego

Mayor's Office (91)
Council President Pro Tem Lightner, District 1
Councilmember Faulconer, District 2
Council President Gloria, District 3
Councilmember Cole, District 4
Councilmember Kersey, District 5
Councilmember Zapf, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Councilmember Emerald, District 9
City Attorney's Office (MS 59)
Park and Recreation Board (77)
Fire and Life Safety Services (79)
Library Department – Government Documents (81)
Park and Recreation Board (83)
Police Research & Analysis (84)
Real Estates Assets (85)
Engineering & Capital Projects (86)
Historic Resources Board (87)
Wetland Advisory Board (91A)
Park Development (93)
Lisa Wood, Environmental Services Department (93A)
Bill Fulton, Director (MS 501)
Tom Tomlinson (MS 501)
Cathy Winterrowd (MS 501)
Nancy Bragado, (MS 413)
Don Weston, Engineering (MS 501)
Gary Geiler, Planning (MS 501)
Ann Gosalves, Transportation Development (MS 501)
Mahomood Keshavarzi, Water Review (MS 401)
Jeanne Krosch, MSCP (MS 413)
Robin Shifflet, Planning (MS 413)
George Ghossain (MS 413)
Brian Schoenfisch (MS 413)

Other Organizations and Interested Individuals

San Diego Association of Governments (SANDAG) (108)
San Diego County Regional Airport Authority (110)
San Diego Transit Corporation (112)
San Diego Gas & Electric (114)
Metropolitan Transit Board (115)
San Diego Unified School District (125)
San Diego City Schools (132)
Environmental Health Coalition (169)
San Diego Chamber of Commerce (157)
Building Industry Federation (158)
Environmental Law Society (164)
Sierra Club (165)

San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
Stuart Hurlbert (172)
Center for Biological Diversity (176)
Endangered Habitats League (182A)
Community Planners Committee (194)
Town Council Presidents (197)
Community Planners Council (198)
Carmen Lucas (206)
San Diego State University, South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Louie Guassac (215A)
Clint Linton (215B)
Frank Brown (216)
San Diego County Archaeological Society (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation (225)
Native American Distribution (225A-S)
San Diego Natural History Museum (166)
Friends of Adobe Falls (335)
Navajo Community Planners, Inc. (336)
Navajo Community Service Center (337)
San Carlos Area Council (338)
San Diego River Conservancy (168)
San Diego River Foundation/Coalition (164)
Del Cerro Senior Social Club (339)
Mission Trails Regional Park (341)



SOURCE: SanGIS, 2013; BRG Consulting, Inc., 2013

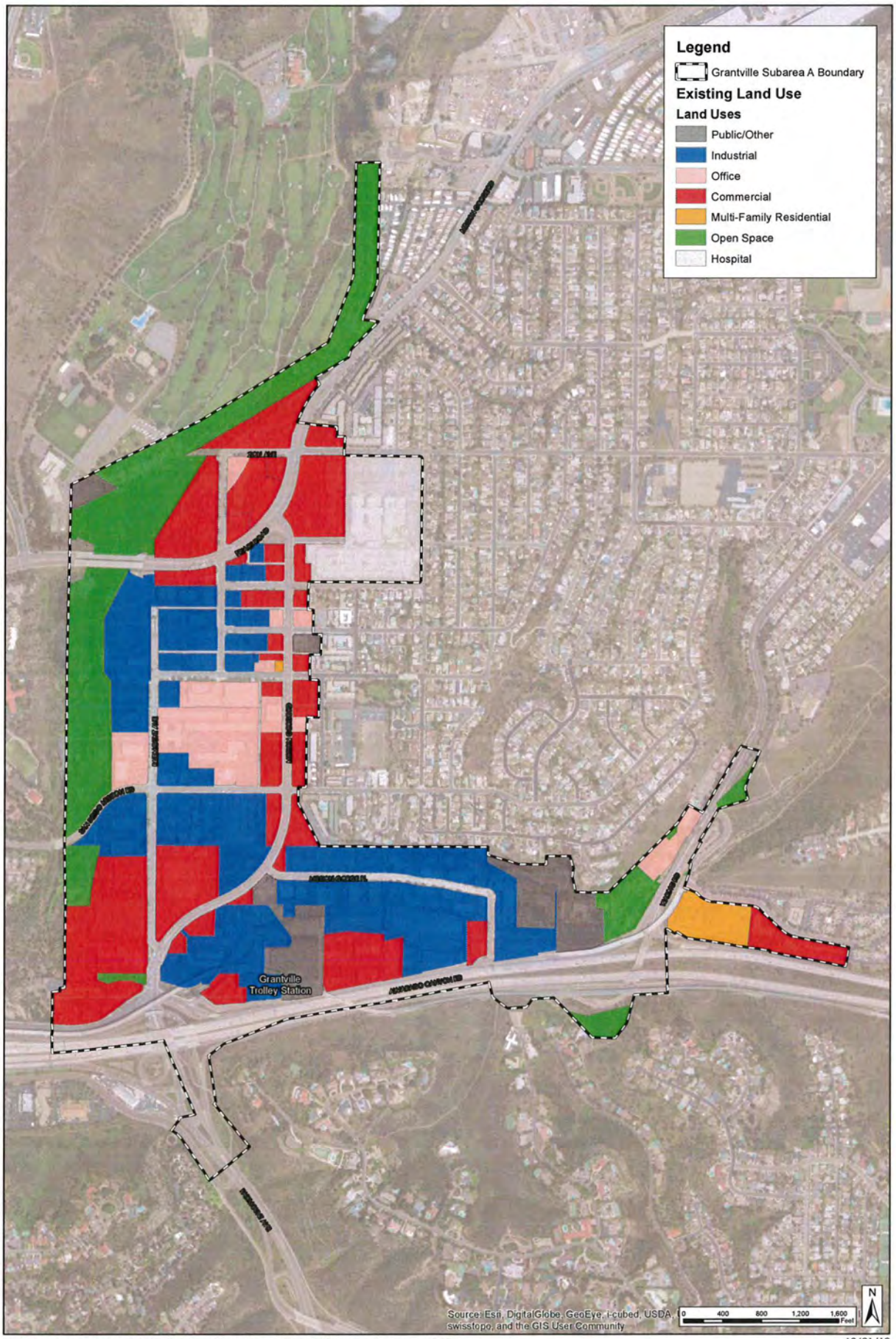
10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Regional Vicinity

FIGURE 1



SOURCE: Esri, 2013; SanGIS, 2013; City of San Diego, 2013; BRG Consulting, Inc., 2013

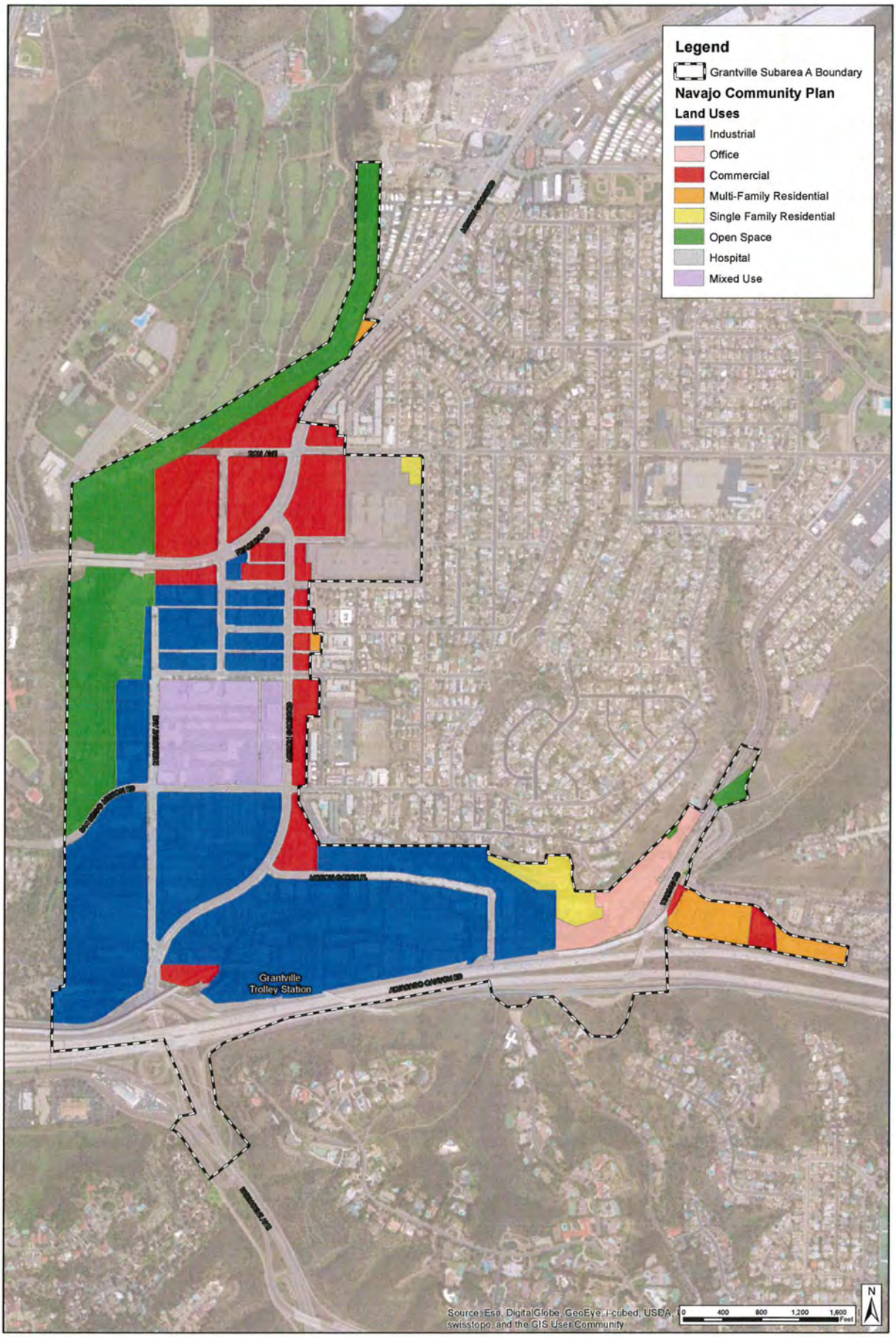
10/21/13

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Grantville Focused Plan Amendment EIR

Existing Land Use

FIGURE 2



SOURCE: Esri, 2013; City of San Diego Navajo Community Plan, 2008

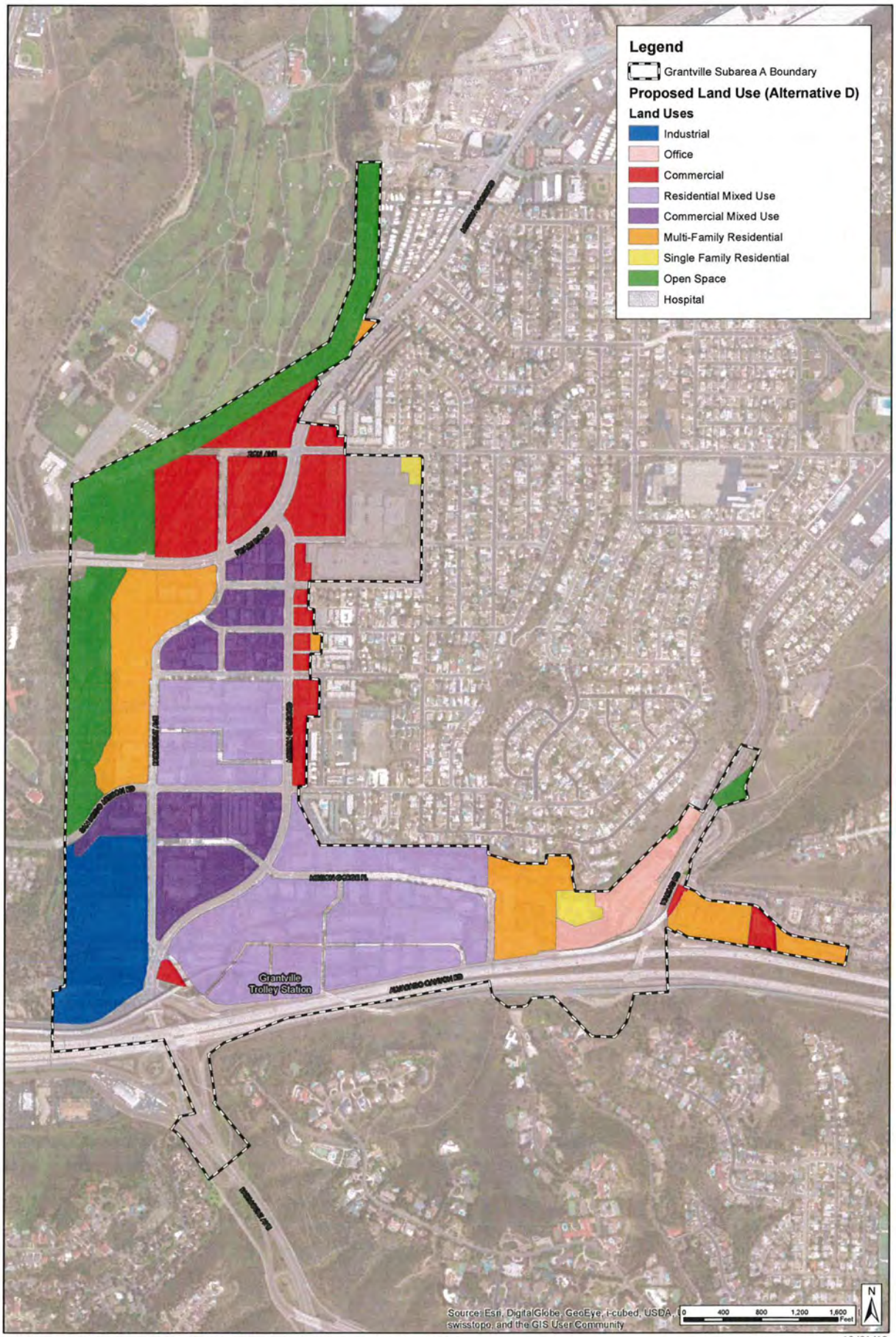
10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Planned Land Use (Navajo Community Plan)

FIGURE 3



SOURCE: Esri, 2013; SanGIS, 2013; City of San Diego, 2013; BRG Consulting, Inc., 2013

10/21/13

BRG CONSULTING, INC.

Grantville Focused Plan Amendment EIR

Proposed Land Use Plan

FIGURE 4

THE CITY OF SAN DIEGO

November 5, 2013

Brian Schoenfisch
City of San Diego
Senior Planner, Development Services Department
1222 First Avenue, MS 413
San Diego, CA 92101

SUBJECT: SCOPE OF WORK FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for the GRANTVILLE FOCUSED PLAN AMENDMENT, NAVAJO COMMUNITY PLAN (Internal Order No. 21003209) SCH No. Pending.

Dear Mr. Schoenfisch:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the Advanced Planning and Engineering Division has determined that the proposed Grantville Focused Plan Amendment may have significant effects on the environment, and preparation of an Environmental Impact Report (EIR) is required. Staff has determined that a project EIR is the appropriate document for the proposed project.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR shall be prepared in accordance with the City's "Technical Report and Environmental Impact Guidelines" dated September 2002 and updated December 2005. A copy of the current guidelines is attached. The project issues to be discussed in the EIR are outlined below. A Notice of Preparation (NOP) specific to the project is being distributed to Trustee and Responsible Agencies and others who may have an interest in the project.

Scoping meetings are required by CEQA section 21083.9 (a)(2) for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold. A scoping meeting has been scheduled for November 19, 2013. Consequently, changes or additions to this scope of work may be required as a result of input received in response to the Scoping Meeting and Notice of Preparation. Please note, further changes to the project, prior to release of the draft EIR, may affect the need to address the issues identified in this letter.

Project Description:

The Grantville Focused Plan Amendment consists of three components: (1) a focused amendment to the Navajo Community Plan, (2) the rezoning of specific parcels, and (3) an update to the Navajo Facilities Finance Plan. The Focused Plan Amendment and rezones would introduce residential and mixed-use development to the Grantville neighborhood, currently comprised of predominately industrial and commercial uses. The proposal was developed through a series of design charrettes and several years of monthly stakeholder meetings.

The project location, referred to as "Subarea A," is located within the former Grantville Redevelopment Project Area, within the eastern portion of the City of San Diego, in San Diego County. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles. Subarea A is a 379-acre area comprised of commercial, office, industrial, public facility, park and open space uses located immediately north of Interstate 8 along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A was formerly addressed by the Program EIR for the Grantville Redevelopment Project (March 2005, SCH #2004071122) prepared for the City of San Diego Redevelopment Agency.

Several project alternatives have been analyzed and through an extensive public meeting process the Grantville Stakeholders Committee has recommended the preferred alternative. The preferred alternative would result in a net increase of approximately 8,275 residential dwelling units when compared to the existing community plan. The Grantville Focused Amendment to the Navajo Community Plan will set out the long-range vision and comprehensive policy framework for how Subarea A could develop over the next 20 to 30 years. The Amendment will provide policy direction for future development and has been guided by the City of Villages growth strategy and citywide policy direction contained within the City of San Diego General Plan (2008).

The proposed project would rezone Subarea A from predominately single-use commercial and industrial zones to multiple-use zones which promote transit-oriented development. The preferred alternative would be implemented through the adoption of three new zones: 1) CC-3-6, a community commercial zone which will emphasize pedestrian orientation and allow up to 44 dwelling units per acre; 2) CC-3-8, a community commercial zone which will emphasize pedestrian orientation and allow up to 73 dwelling units per acre and 3) RM-3-7, a multiple dwelling unit residential zone which will allow for limited commercial uses and up to 44 dwelling units per acre. The application of these zones, together with the adoption of a new Community Plan Implementation Overlay Zone (CPIOZ) will serve as the implementation tools to achieve the proposed land use amendments associated with the preferred alternative. The proposed CPIOZ, referred to as the "Grantville TOD CPIOZ", will promote mixed-use, transit-oriented development with pedestrian and bicycle circulation, and allow for increased density in the area surrounding the Grantville Light Rail Trolley Station, up to 109 dwelling-units per acre, when certain criteria are met.

EIR Requirements:

The EIR serves to inform governmental agencies and the public of a project's environmental impacts. An EIR also proposes mitigation measures and alternatives that may reduce or avoid significant environmental impacts. The EIR must be written in an objective, clear and concise manner. Conclusions must be supported with qualitative information, to the extent practicable.

Each section and issue area of the EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation. The EIR should also include sufficient graphics and tables to provide a complete description of all major project features. Please refer to the "Environmental Impact Report Guidelines," updated December 2005, for additional details regarding the required information.

The EIR shall include a title page that includes the Project Tracking System (PTS) number and the date of publication. The EIR shall include a table of contents and an executive summary of all the following issue areas:

I. INTRODUCTION

The EIR shall introduce the project with a brief discussion on the intended use and purpose of the EIR. This discussion shall focus on the type of analysis that the EIR is providing and provide an explanation of why it is necessary to implement the proposed project. This section shall describe and/or incorporate by reference any previously certified environmental documents that cover the project site including any EIRs. This section shall briefly describe areas where the proposed project is in compliance or non-compliance with assumptions and mitigation contained in these previously certified documents. Additionally, this section will provide a brief description of any other local, state and federal agencies that may be involved in the project review and/or any grant approvals.

II. ENVIRONMENTAL SETTING

The EIR shall describe the precise location of the project and present it on a detailed topographic map and regional map. This section shall also include a map of the specific proposal and discuss the existing conditions on the site. In addition, this section shall provide a local and regional description of the environmental setting of the project, as well as the zoning and land use designations of the site and its contiguous properties, area topography, drainage characteristics, and vegetation. Include any applicable jurisdictional boundaries, land use plans and overlay zones that affect the project area, such as the City of San Diego General Plan. This section shall include a brief description of the location of the closest police and fire stations along with their response times.

III. PROJECT DESCRIPTION

The EIR shall include a detailed discussion of the goals and objectives of the proposed project and a description of the proposed project. As an amendment to the Navajo Community Plan, the project description should include proposed changes to the land use plan, including land uses types and intensity, and proposed rezones within the amendment area. The EIR will also address the Public Facilities Financing Plan to the degree that any impacts associated with plan are disclosed.

IV. HISTORY OF PROJECT CHANGES

This section of the EIR shall outline the chronicle history of the project and any physical changes that have been made to the project in response to environmental concerns raised during the City's review of the project.

V. ENVIRONMENTAL ISSUES

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any significant impacts. Since the City of San Diego is the Lead Agency for this project, the EIR must represent the independent analysis of the City. Therefore, all impact analysis must be based on the City's current "Guidelines for the Determination of Significance." Below are key environmental issue areas that have been identified for this project, within which the issue statements must be addressed individually. Discussion of each issue statement shall include an explanation of the existing project site conditions, impact analysis, significance determination, and appropriate

mitigation. The impact analysis shall address potential direct and indirect impacts that could be created through implementation of the proposed project.

It is important to note that because the proposed project is comprised of a land use plan and implementing regulations (zoning), the impact analysis is programmatic in nature and not project specific. No specific development or improvement is proposed as part of the proposed project.

LAND USE

Issue 1: Would the proposed project implement or result in a conflict with the goals, objectives, and recommendations of the City of San Diego General Plan, the Multiple Species Conservation Program, the San Diego River Park Master Plan, or the Navajo Community Plan or any other applicable land use plan?

Issue 2: Would the project result in the exposure of people to noise levels that exceed the City's noise ordiance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element or the Transportation Element of the General Plan.

Issue 3: Would the proposed project result in adverse edge effects to the MHPA?

Issue 4: Would the project conflict with any local policies or ordinances protecting biological resources?

The project is located within the Navajo Community Planning Area, and portions of the project along the San Diego River to the west are located within the Multi-Habitat Planning Area (MHPA) of the Multiple Species Conservation Program (MSCP), as well as the San Diego River Park Master Plan Area. The EIR will evaluate the project's relationship with the land use policies and guidelines relative to the City's General Plan (2008), the Navajo Community Plan, the MSCP, the San Diego River Park Master Plan, as well as other relevant planning documents and applicable zoning ordinances. FEMA Special Flood Hazard Areas, also addressed in the Hydrology discussion, will be addressed here as well. In addition, this section of the EIR will address community character and the land use compatibility issues associated with the proposed project.

TRAFFIC/CIRCULATION

Issue 1: Would the proposed project result in an increase in project traffic which is substantial in relation to the existing traffic load and capacity of the street system?

Issue 2: Would the proposed project result in traffic generation in excess of specific community plan allocations?

Issue 3: Would the proposed project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange or ramp?

Issue 4: Would the proposed project increase traffic hazards for motor

vehicles, bicyclists or pedestrians?

Issue 5: Does the proposed project conflict with adopted policies, plans or programs supporting alternative transportation models (e.g. bus turnouts, bicycle racks)?

The analysis in this section of the EIR will identify potential impacts to the traffic and circulation system. A traffic study, consistent with the City's Traffic Impact Study Manual and approved by City staff, will be prepared and included as an appendix to the EIR. A summary of the approved traffic study will be included in the body of the EIR. The summary will address the effect the proposed project would have on the existing and future surrounding circulation system. The analysis will focus on segment and intersection conditions for near term and future conditions, with or without the project. This section of the EIR shall also describe any required modifications and/or improvements to the existing circulation system, including City streets, intersections, freeways, and interchanges.

If the project would result in significant impacts to transportation circulation, the traffic study and EIR shall describe measures that would mitigate the impacts to the extent practicable. The section also shall address the walkability, pedestrian, and bicycle connectivity within the project area and how the proposed project will affect these opportunities in the Navajo Community Plan area.

AIR QUALITY AND ODOR

Issue 1: Would the proposed project result in a conflict with or obstruct implementation of the applicable air quality plan?

Issue 2: Would the proposed project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the proposed project result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors)?

Issue 4: Would the proposed project expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates?

Issue 5 Would the project exceed 100 pounds per day of Particulate Matter (PM)(dust)

Issue 6: Would the proposed project create objectionable odors affecting a substantial number of people?

The EIR shall describe the region's climate and the San Diego Air Basin's current attainment levels for state and federal ambient air quality standards. An air quality technical analysis shall discuss the proposed project's impact on the ability of the San Diego Air Basin to meet regional air quality strategies and the project's consistency

with the California Air Resources Board Air Quality and Land Use Handbook. The section and technical report shall discuss both the potential stationary and non-stationary (i.e. vehicular) air emission sources associated with construction and operation of the proposed project. The technical report and EIR section shall include estimates of total project-generated air pollutant emissions, discussion of potential dust generation during construction, evaluation of carbon monoxide hot spots, and any proposed emissions reduction design features or dust suppression measures that would avoid or lessen emissions or dust-related impacts to sensitive receptors within the area.

GREENHOUSE GAS EMISSIONS

Issue 1: Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?

Issue 2: Would the proposed project conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

This section shall present an overview of greenhouse gases (GHG) including the most recent information regarding the current understanding of the mechanisms behind current conditions and trends, and the broad environmental issues related to global climate change. A discussion of current international and domestic legislation, plans, policies, and programs pertinent to global climate change shall also be included. Per General Plan direction, the EIR shall provide details of the project's sustainable features such as pedestrian access and orientation, sustainable design and building features, and other that meet criteria outlined in the Conservation Element of the General Plan.

The EIR shall address the project's contribution to greenhouse gases. A quantitative analysis addressing the project-generated greenhouse gas emissions, as applicable, shall be provided in a GHG emission study summarized in the EIR.

Based on the scope of the project, GHG emissions resulting from both construction activities related to the project and on-going operation of the project must be analyzed. The analysis should include, but is not limited to, the five primary sources of GHG emissions: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation, and water usage. If the proposed project would result in greenhouse gas emissions, project features, designs and measures should be identified and incorporated into the project to reduce GHG emissions.

As part of the cumulative impact analysis, the EIR shall analyze the project's contribution to emissions of greenhouse gases associated with vehicle trips, typical energy and water use, and other factors associated with the proposed project. The City of San Diego currently does not yet have adopted greenhouse gases (GHG) Thresholds of Significance for CEQA. Therefore, the City of San Diego is utilizing the California Air Pollution Control Officers Association (CAPCOA) report "CEQA & Climate Change," dated January 2008, as an interim threshold to determine whether a GHG analysis would be required. The CAPCOA report references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigations.

Therefore, the proposed project will be analyzed to determine whether it exceeds the 900 metric ton screening threshold. Based on this screening threshold, the proposed project may be required to complete a GHG Emission analysis in order to determine what, if any cumulative impacts would result through project implementation. An analysis of existing versus proposed emissions shall be completed. A technical report shall be prepared and will be included as an appendix to the EIR. The EIR shall summarize the results of the report, including identification of the net GHG emissions identified. In addition, the project may also be required to implement project features or mitigation to reduce the emission by 28.3 percent (consistent with the 2020 "Business-as-Usual" model from the California Air Resources Board (CARB).

NOISE

Issue 1: Would the proposed project result in or create a significant increase in the existing ambient noise levels?

A noise impact study will be prepared to analyze ambient noise levels at various public locations throughout the project area in order to characterize and document existing noise conditions. The study will estimate temporary noise levels associated with project construction activity, and model existing and future traffic noise levels along key roadways based on information from the traffic study. Projected increases in noise resulting from increased traffic will be compared to applicable significance thresholds. Noise generated by on-site activities will be estimated based on measured noise on-site and at similar facilities, then compared to City of San Diego standards to determine whether existing or proposed sensitive uses would be exposed to noise exceeding acceptable standards. The project area features land uses that may be considered sensitive receptors (e.g. hospitals, residences, daycare facilities). Additionally, portions of the project area adjacent to the San Diego River feature sensitive habitat and project related noise may impact nesting bird species (e.g., least Bell's vireo), if present. Therefore, this section will overlap with the Biology section in terms of effects the project may have on nesting birds.

BIOLOGICAL RESOURCES

Issue 1: Would the proposed 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 Services (USFWS)?

Issue 2: Would the proposed project result in a substantial 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 Code or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

Issue 3: Would the proposed 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?

Issue 4: Would the proposed project substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

Issue 5: Would the proposed 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, either within the MSCP plan area or in the surrounding region?

Issue 6: Would the proposed project result in the introduction of invasive species of plants into a natural open space area?

Issue 7: Would the proposed project result in discharging into receiving waters with Environmentally Sensitive Lands or water bodies? The biological report and the environmental document should discuss the BMPs to be implemented in order to preclude impacts to biological resources.

Portions of the project area are located within the City of San Diego Multiple Species Conservation Program's (MSCP) Multi-Habitat Planning Area (MHPA), and within a designated Regional Wildlife Corridor (San Diego River) within the MHPA. This corridor supports sensitive biological resources. This section of the EIR will address the relationship between the project site and the Regional Wildlife Corridor in context with the San Diego River.

The same portions of the project area within the MHPA also support sensitive habitat. Vegetation and sensitive wildlife directly or indirectly affected by the proposed project shall be fully discussed in this section of the EIR. A Biological Technical Report will be prepared for the project in accordance with the City of San Diego's *Biological Guidelines* (April 2012) and will be included as appendix to the EIR. This report must identify any MSCP covered and narrow endemic flora and fauna that exist or have a potential to exist in the area of the project site, and any impacts to sensitive flora and fauna, as well as discuss proposed mitigation measures for any impacts.

HYDROLOGY

Issue 1: Would the proposed project result in a substantial increase in impervious surfaces and associated runoff?

Issue 2: Would the proposed project result in a substantial alteration to on-site and off-site drainage patterns due to changes in runoff flow rates or volumes?

Portions of the project area adjacent to the San Diego River have been identified as being within a Special Flood Hazard Area (SFHA) as identified by the Federal Emergency Management Agency (FEMA). The EIR will discuss whether project build-out would result in any increase to the base flood elevation; if so, compliance

with the Federal Insurance Administration's Technical Bulletin 3-93 will be required. The EIR will discuss and analyze the proposed project's impact on the floodway and the floodplain. If development could alter the floodway or floodplain boundaries of the Special Flood Hazard Area, future development would be required to obtain a Conditional Letter of Map Revision/Letter of Map Revision from FEMA.

The EIR shall address any potential changes in stormwater runoff (including both flowrate and volume) as a result of the proposed project. Increases in impervious surfaces could potentially result in significant erosion and subsequent sedimentation downstream. A hydrology/drainage study that is consistent with the City's Storm Water Standards will be prepared to address the proposed project's potential for impacting the hydrologic conditions within the project area and downstream, and recommend drainage design techniques to reduce runoff volumes and velocities if appropriate. Because of the programmatic nature of the project, the study will provide a preliminary analysis of the project's storm drain system(s), but will not serve as a final hydrology study to be used at final engineering and permitting.

This section will also include a brief discussion with respect to the subsurface water sources. The report will include examples of potential best management practices (BMPs) and outline programs that can be used during post-construction and discuss the project's compliance with the City's Storm Water Standards. The findings in the report and required mitigation measures shall be reflected within this section of the EIR and the report shall be included as an appendix to the EIR.

This section will overlap with the Biology section in terms of effects the project may have on wetlands. The Hydrology section will include changes in impervious surfaces and the resulting changes in drainage patterns and their effect on existing wetlands. A project would generally have a significant impact on biological resources if the project would result in degradation in the function and value of habitat or if the proposed project would alter the habitat type. The Hydrology section will not include biological mitigation measures, but will analyze the linkage between drainage patterns and existing wetlands.

WATER QUALITY

Issue 1: Would the proposed project result in an increase in pollutant discharge, including downstream sedimentation, to receiving waters during or following construction, including discharge to an already impaired water body?

A Water Quality Technical Report (WQTR) consistent with the City's Storm Water Standards shall be prepared and included as an appendix to the EIR. Increases in impervious surfaces could potentially result in significant erosion and subsequent sedimentation downstream. Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). The change in impervious surfaces between the current and proposed land use plan should be discussed. If there is a net increase in impervious surfaces anticipated, the impervious surfaces would send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds. Therefore, the EIR and the WQTR shall discuss how the proposed project could affect water quality within the project area and downstream. The EIR section will include the findings and conclusion of the report as well as examples of BMPs and outline programs that can

be used post-construction.

HISTORICAL RESOURCES

Issue 1: Would the proposed project 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 historic site?

Issue 2: Would the proposed project result in any impacts to existing religious or sacred uses or the disturbance of any human remains, including those interred outside of formal cemeteries within the potential impact area?

Issue 3: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The EIR shall discuss the project's potential for impacting historical resources. A historical resources study shall be prepared in order to identify any potential historical resources that may be located within the project area. The study will focus on the development of Grantville, including archival research, records searches, and a reconnaissance-level survey to reveal potentially historic properties and/or districts. The survey will list historic resources eligible or potentially eligible for listing in the California Register of Historical Resources, San Diego Historical Sites, and as a CEQA historic resource. Additionally, the study shall conduct an archaeological inventory of undeveloped portions of the project area, including an intensive field survey.

VISUAL EFFECTS/NEIGHBORHOOD CHARACTER

Issue 1: Would the proposed project create any substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Issue 2: Would the proposed project result in the creation of a negative aesthetic site or project?

Issue 3: Would the proposed project's bulk, scale, materials or style be incompatible with the surrounding development?

Issue 4: Would the proposed project cause a substantial alteration to the existing or planned character of the area?

Issue 5: Would the proposed project create a substantial amount of light or glare that would adversely affect daytime or nighttime views?

The EIR shall include an analysis of the extent to which the components of the proposed project represent a significant change in the nature of the Navajo Community visual setting and context. The visual quality discussion would be closely tied to, and would reference discussions found within the Land Use section of the EIR and would discuss project consistency with the overall goals of the Navajo

Community Plan and San Diego River Park Master Plan.

GEOLOGIC CONDITIONS

Issue 1: Would the proposed project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

Issue 2: Would the proposed project result in a substantial increase in wind or water erosion of soils, either on or off the site?

Issue 3: Would the proposed 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?

The project site is located in a seismically active region of California where the potential for geologic hazards such as earthquakes and ground failures exists. Therefore, a geologic technical report shall be prepared in order to assess any potential geotechnical constraints associated with the proposed project features. According to the City of San Diego Seismic Safety Study (2008 edition), the project site is located within Geologic Hazards Zones 23, 31, 32, 52, and 53. Zone 23 is characterized as a slide-prone formation with "neutral or favorable geologic structure." Zone 31 is characterized as "high potential" for liquefaction and consists of "shallow groundwater, major drainages, and hydrologic fills." Zone 32 is characterized as "low potential" for liquefaction and consists of "fluctuating groundwater with minor drainages." Zones 52 and 53 are level or sloping terrain areas with a low to moderate risk. The EIR shall be based on the geotechnical study and shall include a description of the geologic and subsurface conditions in the project area and the general setting in terms of existing topography, geology (surface and subsurface), tectonics, and soil types. The constraints discussion shall include issues such as the potential for liquefaction, slope instability, and landslides. The geologic investigation that is required for the proposed project and the EIR should include a discussion of the information, conclusions and any mitigation measures, if required.

PALEONTOLOGICAL RESOURCES

Issue 1: Would the proposed project require over 1,000 cubic yards of excavation in a high resource potential geologic formation or over 2,000 cubic yards of excavation in a moderate resource potential formation that would result in the loss of significant paleontological resources?

The geological formations underlying the project areas are considered to have a high or moderate sensitivity for paleontological resources. These formations may contain well-preserved, rare, and significant fossil materials that could provide important information about the evolutionary history of our area. There is a potential for future grading operations to impact previously undisturbed portions of these formations and impact unknown fossil deposits. The EIR shall discuss the project area's geologic composition as it relates to fossiliferous potential and include paleontological monitoring as a mitigation measure, if determined to be required.

HEALTH AND SAFETY

Issue 1: Would the proposed project expose people or structures to a significant risk of loss, injury, or death involving wildland fires?

Issue 2: Would the proposed 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?

Issue 3: Would the proposed project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Issue 4: Would the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, create a significant hazard to the public or environment?

Issue 5: Would the proposed project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

The EIR shall address the potential for hazardous materials to be present within the project area. The EIR shall also include a discussion of emergency evacuation and emergency vehicle access.

PUBLIC SERVICES AND FACILITIES

Issue 1: Would the proposed project have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, fire/life safety protection, libraries, parks or other recreational facilities or maintenance of public facilities including roads and schools?

The EIR will include discussions of potential impacts to City of San Diego public services and facilities as a result of implementation of the proposed project. The EIR will identify the number, location, and size of public facilities such as fire and police stations, public schools, libraries, parks, and other governmental services and facilities. The EIR also will discuss the need for adequate amounts of open space/parks, including a breakdown of the acreage and brief description of open space areas, trails, tot lots, ball courts, benches, picnic areas, etc.

PUBLIC UTILITIES

Issue 1: Would the proposed project result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts (e.g. natural gas, water, sewer, communication systems, solid waste disposal)?

Issue 2: Would the proposed project result in the use of excessive amounts of

fuel or energy (e.g. natural gas), power or water?

Issue 3: Would the proposed project utilize landscape elements which are predominantly non-drought resistant vegetation?

The EIR shall include discussions of potential impacts to City of San Diego public utilities as a result of implementation of the proposed project. This section will rely on a Sewer Study for the proposed project to discuss the project's effects on the City's ability to handle sewer capabilities. This section should also discuss the project's construction and operational effects on the City's ability to handle solid waste. This section should also discuss impacts to water supplies resulting from the increased water demands for the project. This section should reference a Water Supply Assessment (WSA) that will be prepared for the proposed project.

VI. SIGNIFICANT ENVIRONEMTNAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In conformance with CEQA Section 15126.2(b) this section shall describe the significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance.

VII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In conformance with CEQA Section 15126.2(c), the EIR shall discuss the significant irreversible environmental changes, which cannot be avoided if the proposed project is implemented; and the significant irreversible changes that would result from implementation of the proposed project. This section shall also address the use of nonrenewable resources during the construction and life of the project.

VIII. GROWTH INDUCEMENT

The EIR shall address the potential for growth inducement through implementation of the proposed project. The EIR shall discuss the ways in which the proposed project could foster economic or population growth either directly or indirectly. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

IX. CUMULATIVE IMPACTS

When the proposed project is considered with other past, present, and reasonably foreseeable projects in the project area, implementation could result in significant environmental changes, which are individually limited but cumulatively considerable (i.e., substantially contribute to global climate change due to emissions of greenhouse gases). Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts shall be discussed in a separate section of the EIR. The discussion will address the potential cumulative effects related to each environmental resources area that should be discussed in the EIR as outlined above.
The evaluation of cumulative impacts is required by State CEQA Guidelines Section 15130 to be based on either: "(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects

outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

IX. EFFECTS FOUND NOT TO BE SIGNIFICANT

The City of San Diego, as Lead Agency, has determined that the following issue areas are not potentially significant with the proposed project and do not require analysis in this EIR: Agricultural Resources and Mineral Resources. However, if these or other potentially significant issue areas arise during the detailed environmental investigation of the proposed project, consultation with EAS staff is required to determine if these or other issue areas need to be addressed within the EIR. Additionally, as supplementary information is submitted, the EIR may need to be expanded to additional areas.

X. ALTERNATIVES

The EIR should place major attention on reasonable alternatives which avoid or mitigate the proposed project's significant environmental impacts. The alternatives should meet the project objectives. Therefore, a discussion of the project's objectives should be included in this section. In addition to meeting the project's objectives, the alternatives should substantially lessen one or more significant environmental effects and should be feasible.

This section should provide a meaningful evaluation, analysis, and comparison of alternatives' impacts to those of the proposed project (matrix format recommended). These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted with sufficient graphics, narrative and detail to clearly assess the relative level of impacts and feasibility. Issues to consider when assessing "feasibility" are site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations and jurisdictional boundaries.

Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered by the Grantville Stakeholders Committee, but not analyzed in detail. The reason for rejection should be explained.

At a minimum, the following alternatives should be considered:

No Project (No Development) Alternative: The No Project Alternative shall discuss the existing conditions of the site at the time the Notice of Preparation is published. Therefore, this alternative shall consist of the maintenance of the project area in its current condition and would be equivalent to the existing setting.

Reduced Project Alternative: This alternative shall analyze a project that has a reduction in the intensity of development that would potentially reduce or avoid any traffic impacts identified for the proposed project.

If, through the environmental analysis, other alternatives become apparent which would mitigate potential impacts, these options should be discussed with EAS staff prior to including them in the EIR. It is important to emphasize that the alternatives section of the EIR should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternative analysis.

XI. MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP)

For each of the issue areas discussed above, mitigation measures should be clearly identified, discussed, and their effectiveness assessed in each issue section of the EIR. A Mitigation, Monitoring, and Reporting Program (MMRP) for each mitigation measure must be identified. At a minimum, the program should identify: 1) the City department or other entity responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. The separate MMRP should also be contained (verbatim) as a separate chapter within the EIR. When appropriate, EAS staff will provide the applicant with specific Mitigation Monitoring and Reporting Programs to be incorporated into the EIR.

XII. OTHER

The EIR shall include the references, individuals and agencies consulted, and certification page.

Conclusion:

If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with this division is required to determine if these other areas need to be addressed in the EIR, or if the EIR may need to be expanded to include additional issue areas.

Prior to starting work on the EIR, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work. If a screencheck draft EIR is not submitted to EAS for review within 30 days of the date of this letter, the application processing timeline will be held in abeyance until the report has been provided.

Actual cost of Staff work on the EIR will be accounted for against your deposit. Should you have any questions, please contact the Senior Planner, Jeff Szymanski at 619-446-5324.

Sincerely,

Cathy Winterrowd
Interim Deputy Director
Development Services Department

cc: Brian Schoenfisch
EAS File

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

Notice of Preparation

November 6, 2013

To: Reviewing Agencies

Re: Grantville Focused Plan Amendment
SCH# 2013111017

Attached for your review and comment is the Notice of Preparation (NOP) for the Grantville Focused Plan Amendment draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jeffrey Szymanski
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2013111017
Project Title Grantville Focused Plan Amendment
Lead Agency San Diego, City of

Type NOP Notice of Preparation

Description The proposed project would rezone Subarea A from predominately single use commercial and industrial zones to multiple use zones which promote transit-oriented development. Alternative D would be implemented through the adoption of three new zones: 1) CC-3-6, a community commercial zone which will emphasize pedestrian orientation and allow up to 44 dwelling units per acre. 2) CC-3-8, a community commercial zone which will emphasize pedestrian orientation and allow up to 73 dwelling units per acre. 3) RM-3-7, a multiple dwelling unit residential zone which will allow for limited commercial uses and allow up to 44 dwelling units per acre. The application of these zones, together with the adoption of a new Community Plan Implementation Overlay Zone (CPIOZ), will serve as the implementation tools to achieve the proposed land use amendments associated with Alternative D.

Lead Agency Contact

Name Jeffrey Szymanski
Agency City of San Diego
Phone (619) 446-5324 **Fax**
email
Address 1222 First Avenue, MS-501
City San Diego **State** CA **Zip** 92101

Project Location

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

Proximity to:

Highways Interstate Hwy 8/15
Airports No
Railways No
Waterways San Diego River
Schools Multiple
Land Use Residential and Commercial Uses

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Noise; Public Services; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects; Other Issues

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

Date Received 11/06/2013 **Start of Review** 11/06/2013 **End of Review** 12/05/2013

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

NOP Distribution List

County: San Diego SCH# 2013111017

Resources Agency

- [x] **Resources Agency**
  Nadell Gayou
- [ ] **Dept. of Boating & Waterways**
  Nicole Wong
- [ ] **California Coastal Commission**
  Elizabeth A. Fuchs
- [ ] **Colorado River Board**
  Tamya Trujillo
- [ ] **Dept. of Conservation**
  Elizabeth Carpenter
- [ ] **California Energy Commission**
  Eric Knight
- [ ] **Cal Fire**
  Dan Foster
- [ ] **Central Valley Flood Protection Board**
  James Herota
- [ ] **Office of Historic Preservation**
  Ron Parsons
- [x] **Dept of Parks & Recreation**
  Environmental Stewardship Section
- [ ] **California Department of Resources, Recycling & Recovery**
  Sue O'Leary
- [ ] **S.F. Bay Conservation & Dev't. Comm.**
  Steve McAdam
- [ ] **Dept. of Water Resources** Resources Agency
  Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Wildlife Region 1**
  Donald Koch
- [ ] **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2**
  Jeff Drongesen
- [ ] **Fish & Wildlife Region 3**
  Charles Armor
- [ ] **Fish & Wildlife Region 4**
  Julie Vance
- [x] **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6**
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M**
  Heidi Sickler
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M**
  George Isaac
  Marine Region

Other Departments

- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Depart. of General Services**
  Public School Construction
- [ ] **Dept. of General Services**
  Anna Garbeff
  Environmental Services Section
- [ ] **Dept. of Public Health**
  Jeffery Worth
  Dept. of Health/Drinking Water
- [ ] **Delta Stewardship Council**
  Kevan Samsam

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Michael Machado
- [ ] **Cal EMA (Emergency Management Agency)**
  Dennis Castrillo
- [x] **Native American Heritage Comm.**
  Debbie Treadway
- [ ] **Public Utilities Commission**
  Leo Wong
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Business, Trans & Housing

- [ ] **Caltrans - Division of Aeronautics**
  Philip Crimmins
- [ ] **Caltrans - Planning**
  Terri Pencovic
- [ ] **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects
- [ ] **Housing & Community Development**
  CEQA Coordinator
  Housing Policy Division

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Gary Arnold
- [ ] **Caltrans, District 4**
  Erik Alm
- [ ] **Caltrans, District 5**
  David Murray
- [ ] **Caltrans, District 6**
  Michael Navarro
- [ ] **Caltrans, District 7**
  Dianna Watson
- [ ] **Caltrans, District 8**
  Dan Kopulsky
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [x] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Maureen El Harake

Cal EPA

Air Resources Board

- [x] All Projects
  CEQA Coordinator
- [ ] Transportation Projects
  Jon Taylor
- [ ] Industrial Projects
  Mike Tollstrup
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- [ ] **Dept. of Toxic Substances Control**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [ ] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
- [ ] **RWQCB 5F**
  Central Valley Region (5)
  Fresno Branch Office
- [ ] **RWQCB 5R**
  Central Valley Region (5)
  Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
- [ ] **RWQCB 6V**
  Lahontan Region (6)
  Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [x] **RWQCB 9**
  San Diego Region (9)

- [ ] **Other** _____
- [ ] _____
  Conservancy

Last Updated 9 /24/2013

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
PLANNING DIVISION
4050 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711

Flex your power!
Be energy efficient!

December 5, 2013

11-SD-8
PM 6.34
Draft PEIR NOP
Grantville Master Plan, Subarea A
SCH #2013111017

Mr. Brian Schoenfisch
City of San Diego
1222 First Avenue, MS-413
San Diego, CA 92101

Dear Mr. Schoenfisch:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Notice of Preparation (NOP) for a Draft Program Environmental Impact Report (PEIR) for the Grantville Focused Plan Amendment for Subarea A. The State Highways serving the area are Interstate 8 (I-8) at Mission Gorge Road-Fairmount Avenue, and Interstate 15 (I-15).

Caltrans would like to submit the following comments:

Please ensure that the traffic study to be prepared and included as an appendix to the Draft PEIR, as explained in page 5 of the NOP, addresses Traffic/Circulation Issue #3 (*Would the proposed project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?*) for the I-8/Mission Gorge Road-Fairmount Avenue interchange, including the cumulative effects of Grantville Subarea B. Where feasible, Caltrans endeavors that any direct and cumulative impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

Please note that Caltrans has previously commented on Grantville Subarea A, in letters dated March 11, 2009 for the Alvarado Road Realignment Study and July 23, 2009 for the Existing Traffic Analysis. At that time, Caltrans had reviewed a Conceptual Striping Plan for the I-8/Mission Gorge Road-Fairmount Avenue interchange, and commented in the March 11, 2009 letter that:

> The proposed changes to the lane configuration to add additional lanes by re-striping the roadway in both the [Eastbound] and [Westbound] directions of Fairmount Avenue within Caltrans right-of-way will require Mandatory Design Exceptions for reduced lane and shoulder widths.
>
> With regard to there-striping and design exceptions, please explain how the existing bike access will be maintained and/or bikes will be accommodated.

Caltrans has also produced conceptual designs for the I-8/Mission Gorge Road-Fairmount Avenue interchange accommodating a Commuter Bike Path, for both the Near Term and for 2030, that the City could consider as potential mitigation projects. The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, including identifying improvement projects in the appropriate community financing plan.

The San Diego Association of Governments (SANDAG), in coordination with Caltrans, is currently administering the I-8 Corridor Study, which will assess a set of identified operational improvements along I-8 between Ocean Beach to the west and College Avenue to the east including, but not limited to, interchange and ramp modifications. As part of this analysis, access alternatives to I-8 at Mission Gorge Road-Fairmount Avenue may be evaluated for potential improvements that will enhance overall travel efficiencies at that location.

Please note that SANDAG's adopted Regional Bicycle Plan proposes a Class I bicycle path along segments of Mission Gorge Road for the 17.3-mile San Diego River Bikeway.

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 per household. In order to create more efficient and livable communities, Caltrans encourages local agencies to work towards a safe, functional, interconnected, multi-modal system integrated with "smart growth" type land use planning.

Overall, Caltrans supports the concept of a local circulation system which is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. As a result, 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 which can improve mobility and alleviate traffic impacts to State facilities.

Caltrans appreciates the continued coordination with City staff on this plan, including in the aforementioned I-8 Corridor Study. If you have any questions, please contact Connery Cepeda, of the Public Transportation/Grant Administration Branch, at (619) 688-6003 or connery_cepeda@dot.ca.gov.

Sincerely,

JACOB ARMSTRONG, Chief
Development Review Branch

c: State Clearinghouse

San Diego County Archaeological Society, Inc.

Environmental Review Committee

23 November 2013

To: Mr. Brian Schoenfisch
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report
Grantville Focused Plan Amendment

Dear Mr. Schoenfisch:

Thank you for the Notice of Preparation for the subject project, received by this Society earlier this month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

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

cc: SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net

November 19, 2013

Mr. Brian Schoenfisch, Senior Planner

City of San Diego Department of Development Services

1222 First Avenue, MS 413
San Diego, CA 92101

RE: SCH#2013111017 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **"Grantville Focused Plan Amendment, (City #21003209)(would influence residential & commercial development near the light rail line);"** located in the Navajo Community Plan Area; City of San Diego; San Diego County,, California

Dear Mr. Sxhoenfisch:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

Native American Contacts
San Diego County, California
November 19, 2013

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court — Diegueno/Kumeyaay
El Cajon , CA 91919
(619) 445-0238 - FAX
(619) 659-1008 - Office
kimbactad@gmail.com

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator; Viejas THPO
240 Brown Road — Diegueno/Kumeyaay
Alpine , CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
1095 Barona Road — Diegueno/Kumeyaay
Lakeside , CA 92040
(619) 478-2113
(KCRC is a Coalituon of 12
Kumeyaay Governments)
bp@lapostatribe.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013111017; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Granville Focused Plan Amendment; located in the Navajo Community Plan Area; San Diego County, California.

Native American Contacts
San Diego County, California
November 19, 2013

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul , CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 - Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 FAX

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O Box 270 Diegueno
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Viejas Band of Kumeyaay Indians
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This list is current only as of the date of this document.

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his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013111017; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Granville Focused Plan Amendment; located in the Navajo Community Plan Area; San Diego County, California.

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San Diego County, California
November 19, 2013

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Kumeyaay Cultural Historic Committee
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San Pasqual Band of Mission Indians
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Grantville Focused Plan Amendment
Public Scoping Meeting
Sign-In Sheet

Name	Address	Phone Number	Email Address	Contact?* (Y/N)
LYNN MURRAY	6549 CARTHAGE ST SD 92120	619 582-1024	lynnmurray@cox.net	Y
Elise Caster	4007 Mission Gorge Place	619 287-8873	elisec@casterarp.com	Y
Brittany Ruggels	PO BOX 882676	(619)204-9757	brittany@kherplanning.com	
Karen Ruggels (Fenton)	P.O. Box 882676	619 578 9505	karen@kherplanning.com	
Jay Wilson	5836 Arboles St 92120	619 405 0127	jwilson2@cox.net	
RICH THESING	10967 VALLECITOS LN 92124	(619) 761 4838	RTHESING@SAN.RR.COM	Y
Jim Peugh	2776 N. Soma St	619 224 4391	peugh@cox.net	Y
Daron Teemsma	4533 Mission Gorge Place	619-954-3993	daronte@gmail.com	Y

*Mark 'Y' if you'd like to receive a Notice of Availability for the Draft EIR.

Tuesday, November 19, 2013 6:00-8:00 pm